

Greater Norwich Local Plan

Hearing Statement

Matter 4 –Sustainable Communities and the Environment

Introduction

This Hearing Statement has been produced by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council as the Greater Norwich Development Partnership (GNDP).

The Document Library for the Greater Norwich Local Plan (GNLP) Examination and further information can be found on the GNLP Examination website:

www.gnlp.org.uk

The Councils have responded to each question directly in the body of the Hearing Statement.

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

Introduction to the Partnership's question responses

1. The following timeline and links provide context for the partnership's responses to the Inspectors' Matters, Issues and Questions below, referencing relevant announcements, examination correspondence and the publication of key documents:
 - I. **16th March 2022** - The Government released a Written Ministerial Statement ([WMS](#)) on Nutrient Levels in River Basin Catchments. It made it clear that housing and some other development in much of Greater Norwich and some other parts of Norfolk must mitigate nutrient pollution to allow development to take place. At the same time, the Chief Planner sent [a letter](#) to the affected local planning authorities (LPAs) on nutrient pollution issues, support and funding. Natural England (NE) also published [advice](#) and a methodology on evidencing nutrient neutrality mitigation.
 - II. **April 19th 2022** - The GNLP Inspectors wrote to the GNLP team manager ([D5.11](#)) requesting that the partnership and NE prepare a statement of common ground which sets out work which needs to be done and how the GNLP policies will ensure compliance with the WMS.
 - III. **3rd May 2022** - The partnership's response to the Inspectors' letter was placed on the GNLP website ([D5.12](#)). It broadly set out the approach to be taken to address nutrient neutrality, including working closely with NE and producing evidence on local mitigation solutions.
 - IV. **July 2022** A [written ministerial statement](#), a DEFRA issued [direction](#), and a Chief Planner's [letter](#) set an accelerated timescale for NE's mitigation schemes and stated that mitigation burdens from 2030 will be reduced as a result of legislation requiring waste water treatment works upgrades.
 - V. **8th February 2023** –
 - a. The Inspectors' Matters, Issues and Questions ([G1.1](#)) for the hearing session on nutrient neutrality on March 21st 2023 were placed on the GNLP website.
 - b. The partnership's Nutrient Neutrality Evidence Note ([G2.1](#)) was published. This includes a statement of common ground with NE which contains the proposed main modifications to policy 2 to address nutrient neutrality, along with updated viability evidence.
 - c. The draft Norfolk Nutrient Strategy Mitigation Solutions document ([G2.2](#)) was also published.
 - VI. **January to March 2023** – Cabinet reports have been considered by the Greater Norwich authorities on the establishment of a Joint Delivery Vehicle (JDV) to broker the delivery of mitigation options.
2. The current Habitats Regulation Assessment (HRA, July 2021 [A7](#)) and Sustainability Appraisal (SA January 2021, [A6.2](#)) of the GNLP will be updated to reflect the main modifications to the plan for consultation.

Question 16

Is the modification to Policy 2 suggested by the GNLP (in the Nutrient Neutrality Mitigation Statement of Common Ground with Natural England) justified, effective and consistent with national policy, the Written Ministerial Statement of 16 March 2022, and the evidence?

Response to question 16

Introduction

1. The Greater Norwich Partnership and Natural England (NE) have agreed through a statement of common ground (see GNLP Nutrient Neutrality evidence note [G2.1](#), in particular pages 8 and 9) that the following proposed main modification for inclusion in the Greater Norwich Local Plan (GNLP) is needed to address the nutrient neutrality requirements published in the Written Ministerial Statement ([WMS](#)) of 16th March 2022:

10. Within the catchments of the River Wensum Special Area of Conservation (SAC), The Broads SAC and the Broadland Ramsar:

- *Residential development that results in an increase in the number of overnight accommodation and*
- *Non-residential development that, by virtue of its scale or type may draw people from outside the catchments of the SACs and/or generate unusual quantities of surface water and/or (by virtue of the processes undertaken) contain unusual pollutants within surface water run-off*

must provide sufficient evidence to enable the Local Planning Authority to conclude through a Habitats Regulations Assessment that the proposal will not adversely affect the integrity of sites in an unfavourable condition.

Justification

2. Paragraph 35 of the National Planning Policy Framework ([NPPF](#)) defines a **justified** approach as “An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”.
3. The proposed policy is appropriate in that it is intended to and will ensure that relevant planning permissions will only be granted with necessary nutrient mitigation in place prior to occupation of a relevant development and in compliance with the Habitats Regulations.
4. The potential for reasonable alternative approaches is constrained in this case as the legislative framework in regulation 8 of the Conservation of Habitats and Species Regulations 2017 is prescriptive that local planning authorities (LPAs) can only approve a relevant project if they are certain it will have no negative

effect on protected habitat sites. The March 2022 Written Ministerial Statement ([WMS](#)) further emphasises that this is the case.

5. The protected habitats relevant to development in Greater Norwich are the River Wensum Special Area of Conservation (SAC), The Broads SAC and the Broadland Ramsar. These habitats are named in the proposed modifications to policy 2 which apply to relevant development in their river catchments that could add pollutants to the protected habitats. As it is essential that the policy ensures that relevant development does not adversely affect the integrity of sites in an unfavourable condition, no alternative approach is considered suitable.
6. The proposed policy is based on proportionate evidence in that it:
 - Follows the 16th March 2022 NE [advice](#) letter and more detailed evidence from NE on phosphorous pollution affecting the [River Wensum SAC](#) and phosphorus and nitrogen pollution affecting the [Broads SAC and the Broadland RAMSAR](#). The policy has been developed through co-operative working between NE and Greater Norwich partnership officers, with the available evidence and legal requirements guiding proposed policy content;
 - States that the nutrient neutrality requirement only applies whilst the protected habitat sites are in unfavourable condition, meaning that the policy would no longer be applied if up to date evidence shows that the habitats have been restored to a favourable condition;
 - Only applies to residential developments leading to an increase in overnight accommodation and non-residential development that may draw people from outside the catchments of the SACs and/or generate unusual quantities of surface water and/or contain unusual pollutants within surface water run-off;
 - Only applies to those parts of Greater Norwich affected by the WMS, as southern parts of South Norfolk and Broadland are not in the affected river catchments.
7. Most significantly, the proposed policy requires evidence to be submitted with planning applications to the local planning authority, as the competent authority, to undertake a Habitats Regulations Assessment and conclude that the proposal will not adversely affect the integrity of protected habitats. To achieve this, the evidence must show that mitigation has been secured and will be implemented for relevant developments prior to their occupation.

Effectiveness

8. Paragraph 35 of the [NPPF](#) defines an **effective** approach as *deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground*.
9. The Norfolk Strategic Planning Framework (2019 version [B2.2](#) and 2021 version [B2.3](#)) is the Statement of Common Ground which ensures there is effective joint

working on strategic matters across the county, including by guiding the content of local plans.

10. Agreement 21 of the NSPF commits the partners to working together through Water Resources East's strategies to protect water quality and Agreement 23 states that the LPAs will:
 - a. work with water companies on the delivery of development sites and proposed utility projects to ensure that development is aligned with wastewater infrastructure and
 - b. produce Habitat Regulation Assessments, as required, that will also consider the impact of development on sensitive sites.
11. Accordingly, the proposed modifications to policy 2 focus on HRA requirements to address nutrient neutrality and GNLP policy 4 covers cooperative working in relation to infrastructure delivery.
12. Due to the timing of the NE announcement on nutrient neutrality in March 2022 during the GNLP examination, the approach taken in Greater Norwich is likely to act as a model for other LPAs' local plans which will be impacted by nutrient neutrality. The draft policy has been shared with the partners.
13. Since the March 2022 announcement on nutrient neutrality, the Norfolk LPAs have closely cooperated on addressing this complex cross boundary issue. This includes commissioning the recently published joint evidence on local mitigation solutions (the draft Norfolk Nutrient Strategy Mitigation Solutions document [G2.2](#)) and the production of the [Norfolk Budget Calculator](#) which uses locally specific data to assess how much mitigation will be required to offset proposed schemes (see also the response to question 18). The proposed modifications to policy 2 require evidence on nutrient neutrality which the above work will contribute to.
14. The response to questions 17 and 18 below shows that the proposed approach will be **deliverable** over the plan period.

Consistency with national policy, the Written Ministerial Statement and evidence

15. Paragraph 179 of the [NPPF](#) states the plans should promote the conservation, restoration and enhancement of priority habitats. Its glossary defines such habitats as those covered under the Habitats Regulations, including SACs and Ramsars. Government guidance ([PPG Paragraph: 001 Reference ID: 65-001-20190722](#)) confirms that competent authorities, including LPAs "*may agree to the plan or project only after having ruled out adverse effects on the integrity of the habitats site.*"
16. The March 16th 2022 Written Ministerial Statement ([WMS](#)) on Nutrient Levels in River Basin Catchments clarified that LPAs affected by nutrient neutrality are "competent authorities" under the Habitats Regulations and stated that "*Local*"

Planning Authorities can only approve a project if they are certain it will have no negative effect on the protected site". The WMS also referenced the availability of a national nutrient calculator, announced funding to help LPAs to address the issue and flagged up work to be undertaken with water companies and on legislation.

17. The proposed GNLP policy amendments address the key NPPF requirement to conserve, restore and enhance protected habitats. The policy also meets the HRA requirement (as confirmed in the PPG, WMS and the Chief Planner's letters referenced in the introduction to this response for evidence) to provide certainty on the effects of development on protected habitats. Paragraph 7 above explains how the proposed policy modifications will do this.
18. The proposed policy is therefore consistent with the national policy, the WMS and advice from the Chief Planner.
19. Paragraphs 6 and 7 above set out aspects of how the policy is based on proportionate evidence. The GNLP Nutrient Neutrality evidence document [G2.1](#) covers:
 - a. The background to the nutrient neutrality issue in Greater Norwich, including completed work from consultants Royal Haskoning on a local nutrient calculator and ongoing work on producing a nutrient neutrality mitigation strategy.
 - b. Ongoing work with Anglian Water to establish a Joint Delivery Vehicle (JDV) to broker delivery of variety of mitigation options between providers such as landowners and developers.
 - c. A Statement of Common Ground (SoCG) between the Greater Norwich partnership and Natural England (NE) on addressing nutrient neutrality through the GNLP
 - d. An addendum to the submitted Viability Appraisal ([B26.3](#)) covering the costs of nutrient neutrality mitigation measures and their implications for the viability of housing development promoted through the GNLP.
20. Further information on the evidence base for the policy and its future implementation is provided in the responses to questions 17 and 18 below.

Question 17

Is the application of the Policy 2 as suggested to be modified in Q16 likely to affect the viability and deliverability of residential development in the plan area?

Response to question 17

Viability of residential development

- 1 Paragraph 9 of the partnership's nutrient neutrality evidence ([G2.1](#)) states that “A portfolio of mitigation opportunities will enable HRA requirements to be addressed at a reasonable cost, limiting the impact on the viability of development”.
- 2 Evidence on this is provided in the addendum to the submitted Viability Appraisal ([B26.3](#)) covering the costs of nutrient neutrality mitigation measures and their implications for the viability of housing development. The Viability Appraisal addendum is included as appendix 2 of the partnership's nutrient neutrality document [G2.1](#) (see page 14 onwards).
- 3 The addendum takes a precautionary approach using two scenarios for its modelling based on mitigation costing £5,000 or £7,000 per dwelling. This reflects both the experience of other LPAs which have been subject to nutrient neutrality issues for a longer period of time than Greater Norwich (see appendix A on page 28 of [G2.1](#)) and emerging evidence, including the work done locally by consultants Royal Haskoning (see paragraph 34 on page 25 of [G2.1](#)).
- 4 The modelling concludes that the plan will provide for viable housing development in all but one of the notional typologies provided that the schemes now showing a deficit are treated as being marginal and that the nutrient neutrality mitigation costs applied are a worst-case scenario.
- 5 It is also important to note that:
 - a. New dwellings on mainly brownfield sites in Norwich will benefit from mitigation from a programme of retrofitting water efficiency measures in council owned housing which will offset pollutants in wastewater from newbuild homes at an estimated cost of £4,350 per new dwelling. The December 2022 [report](#) to Norwich City Council's cabinet (referenced on page 13 of the partnership's nutrient neutrality evidence [G2.1](#)) estimated that 1,400 new homes could be offset through retrofitting. Ongoing work which focuses on the water savings resulting from retrofitting now suggests that headroom for more homes will be provided.
 - b. Many large-scale greenfield developments will be able to provide on-site mitigation measures which would reduce mitigation costs per dwelling.
 - c. Table 4.1 of the mitigation strategy ([G2.2](#)) provides both capital and operational costs for different types of mitigation, showing that the cost estimates used in the viability study are reasonable. These costs are most likely to apply to sites that are less able to provide on-site mitigation such as small to medium scale greenfield developments and brownfield sites in

- Norwich which come forward later in the plan period so will not benefit from the retrofitting scheme. However, point d) following shows that the costs are very likely to reduce post 2030 due to required improvements to strategic wastewater treatment plants.
- d. Emerging legislation in the Levelling Up and Regeneration Bill will require water companies to reduce nutrient pollution from wastewater treatment works in nutrient neutrality areas to the best to the best Technically Achievable Limit (TAL) by 2030. Paragraph 14 of the mitigation strategy [G2.2](#) states that phosphorus mitigation requirement will be reduced by 36% post 2030 and nitrogen mitigation by 65%. Consequently, it seems likely that the cost per dwelling of nutrient neutrality mitigation measures will be reduced post 2030 once improvements to strategic wastewater treatment plants have been made, thus reducing these costs for housing being delivered later in the plan period.
 - e. Potential main modifications to GNLP policy 5 which have already been discussed at examination hearings would allow for site specific viability issues to be submitted and considered with a planning application. This will enable viability issues on marginal typologies to be fully addressed.
- 6 Consequently, it is concluded that for the majority of different types of housing development, nutrient neutrality mitigation costs are not predicted to make sites unviable. For those housing developments which could evidence that they would face viability issues, site specific viability issues would be considered with a planning application. Therefore, thanks to proactive work to provide a portfolio of mitigation solutions, all types of housing promoted in the GNLP and included in its housing trajectory will have access to affordable nutrient neutrality mitigation.

Deliverability of residential development

- 7 The NPPF glossary states that “*To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years*”. It then provides further detail on how sites with full and outline planning permissions should be considered in terms of deliverability.
- 8 The Chief Planner’s [letter](#) of 21st July 2022 said that Government will make clear in planning guidance that judgements on deliverability of sites should take account of
- a. strategic mitigation schemes
 - b. the accelerated timescale for Natural England’s mitigation schemes and
 - c. immediate benefits on mitigation burdens once legislation requiring water treatment upgrades comes into force.
- 9 Further to this, the letter stated that
- d. DLUHC will revise planning guidance over the summer (of 2022) to reflect that sites affected by nutrient pollution forming part of housing land supply calculations are capable of being considered deliverable for the purposes

of housing land supply calculations, subject to relevant evidence to demonstrate deliverability.

- e. It will be for decision takers to make judgements about impacts on delivery timescales for individual schemes in line with the National Planning Policy Framework.

10 While detailed guidance has not yet been issued and NE mitigation schemes are still in development, the Government's position on the principle is clear that sites affected by nutrient pollution forming part of housing land supply calculations are capable of being considered deliverable.

11 The impacts on the GNLP's housing delivery trajectory resulting from the hiatus in granting permissions have been taken into account in the revised trajectory to be considered under Matter 15.

Question 18

Q18 Is the nutrient neutrality mitigation strategy likely to be successful in facilitating the delivery of the plan?

Response to question 18

1. The nutrient neutrality mitigation strategy ([G2.2](#)) will make a major contribution to the successful delivery of the plan. There is parallel and linked ongoing work on a Joint Delivery Vehicle (JDV), mitigation to be provided by Natural England, the likely development of private schemes, work to rapidly progress improvements to wastewater treatment works being led by Anglian Water and the potential for other off-site and on-site mitigation schemes in some locations. Taken together, this wide range of developing opportunities mean that the Norfolk catchment authorities are in the vanguard of providing mitigation for developers. This has been confirmed by the Planning Advisory Service (PAS) in their email in appendix A of this response.
2. In line with the Chief Planner's [letter](#) of 21st July, the remainder of this response provides information on strategic mitigation schemes being brokered by the Norfolk LPAs through the nutrient neutrality mitigation strategy, Natural England's work on mitigation schemes, work on wastewater treatment works and other initiatives to provide nutrient neutrality mitigation.

Strategic mitigation schemes

3. The Norfolk LPAs' cooperative work has already made progress on addressing nutrient neutrality mitigations requirements. Information on nutrient neutrality is already available through dedicated [website coverage](#). This includes the [Norfolk Budget Calculator](#) which uses locally specific data to assess how much mitigation will be required to offset proposed schemes on a site-by-site basis, either through off-site or on-site mitigation.
4. The mitigation strategy is being produced by consultants Royal Haskoning for the Norfolk LPAs impacted by nutrient neutrality in two stages:
 - a. The first stage has been produced and is document [G2.2](#) on the examination website. It provides analysis of a wide range of mitigation solutions. Short, medium and long-term classifications are used to provide an indication of the timescales for delivery of different forms of mitigation. For example, cover crops and retrofitting water saving measures will provide short-term mitigation measures which can readily be implemented for planning applications coming forward in the near future. The first report also covers the duration of operation of different solutions i.e. temporary (up to 5 years), impermanent (5 to 10 years) and permanent (retained in perpetuity).
 - b. The second report, to be completed in mid-March 2023, will contain additions including a detailed assessment of long-term nutrient mitigation solutions

along with further detail on the preferred solutions to be delivered and the likely costs, timescales and delivery mechanisms.

5. The mitigation strategy states that *“It is likely that a combination of measures will be most effective in nutrient offsetting. For example, incorporating SuDS into new developments, whilst constructing riparian buffer strips to lower the nutrient burden. A range of techniques can be used in the river catchments, and these are mainly aimed at slowing runoff and trapping sediment-bound pollutants”*.
6. Table 3.1 of the mitigation strategy ([G2.2](#)) summarises all types of mitigation suitable in Norfolk and table 4.1 covers short-term mitigation solutions. Table 3.1 classifies the solutions into types: nature-based; runoff management; wastewater management and demand management.
7. In summarising the short-listed short-term solutions and providing both capital and operational costs for different types of mitigation, section 4.1 of G2.2 emphasises the benefits of a portfolio of measures being available to developers and shows that the cost estimates used in the viability study are reasonable (see also the response to question 17 above).
8. The potential for retrofitting water efficiency measures into existing council owned homes in Norwich to provide headroom for new housing development in the city highlighted in paragraph 5a of the response to question 17 is already being progressed. Appendix A on page 33 of the December 2022 Norwich Cabinet [report](#) lists the developments which can benefit from the retrofitting, with sites in rows 1 to 10 prioritised. This includes all 1,100 homes applied for at Anglia Square, phase 1 of the Mile Cross Depot (76 homes) and Three Score Phase 4 (94 homes).
9. As well as development of the mitigation strategy, there is also significant ongoing work between Norfolk local councils and Anglian Water to establish a Joint Delivery Vehicle (JDV) to implement strategy delivery. The JDV will broker the delivery of variety of mitigation options between providers such as landowners and developers. Small and medium scale developments will particularly benefit from mitigation made available from April 2023, most likely at a cost of between £5,000 and £7,000 per dwelling. The joint venture company, named Norfolk Environmental Credits, is intended to secure mitigation and then issue certificates confirming the credits that had been purchased. Developers would then submit the certificates with their planning applications. Reports on the JDV are being considered by relevant Norfolk LPA cabinets between January and March 2023 (see the South Norfolk [cabinet report](#) as an example).
10. Anglian Water has confirmed that it is actively progressing work to confirm whether it will be part of the JDV in its email in appendix A of this response.
11. The following sets out timescales for progressing the Norfolk Environmental Credits Joint Venture

- a. 30th March 2022 - the Greater Norwich Growth Board (GNGB) will be asked to confirm their commitment to using their resources to address nutrient neutrality issues, including considering accelerating the development of their City Deal Borrowing cyclical loan fund, and exploring options for providing financial loan support to Norfolk Environmental Credits. If progressed, it is likely that the funding would be available from September 2023.
- b. April 2023 - Norfolk Environmental Credits will go 'live'. It is anticipated that a limited number of credits will be available to small-scale developers initially.
- c. April 2023 onwards - Ongoing negotiations will take place to secure the mitigation arising from other large-scale projects such as septic tank conversion, riparian buffers and Anglian Water improvements, including infrastructure and nature-based solutions. This will increase the number of credits available rapidly.

Natural England's Approach

12. NE has been involved in the development of the Norfolk mitigation strategy ([G2.2](#)) in line with Agreement 1 of the Statement of Common Ground (see page 9 of the partnership's nutrient neutrality evidence document [G2.1](#)) which commits the partnership and NE to working together to provide mitigation solutions.
13. In response to a requirement from government through a [written ministerial statement](#) published on 20th July 2022 and a DEFRA issued [direction](#) on 28th July 2022, NE is also working on a separate strategic mitigation scheme for Greater Norwich. Nutrient calculators based on a national approach for the [Wensum](#) and the [Broads SACs](#) have been provided by NE. It is understood that NE will provide schemes and nutrient neutrality credits on nature and land-based solutions such as wetlands and woodlands, but that these will not provide sufficient capacity to meet all the need in Greater Norwich. NE is undertaking a procurement exercise to look into the feasibility of a number of sites for nature-based mitigation. It is also understood that these will be medium to long term solutions.
14. The partnership is also preparing a draft Strategic HRA with NE for developments of 10 dwellings and fewer to be granted planning permission via a streamlined process on the basis that the mitigation that can be secured through Norfolk Environmental Credits. This is scheduled to be available from April 2023:

Water Treatment Works Upgrades

15. As stated in the response to question 17 above, the Levelling Up and Regeneration Bill will require Anglian Water to reduce nutrient pollution from larger wastewater treatment works to the highest achievable technological levels by 2030. Subject to parliamentary approval, Royal Assent for the bill is anticipated Spring 2023.
16. Anglian Water is also currently working with the Joint Venture to deliver nutrient mitigation via improvements to their own infrastructure ahead of the 2030 requirement, including enabling the provision of mitigation which can be sold to

developers in the form of nutrient credits. Anglian Water has confirmed this in its email in appendix A of this response.

Other initiatives

17. Other specific initiatives in line with the mitigation strategy currently being progressed are likely to beneficially impact on the mitigation solutions available over the next year:
- a. Paragraph 5b in the response to question 17 highlights that some large-scale greenfield developments can provide on-site mitigation. At present, strategic housing developments at Beeston Park, Long Stratton, Rackheath and Taverham are progressing on-site mitigation schemes. At Long Stratton, the developer has submitted a nutrient neutrality strategy that covers all 1,800 homes and is working with Natural England on what the long-term position and technical achievable limits are. Further detail on key strategic sites is in the response to matter 15.
 - b. Barratts David Wilson Homes are proactively seeking solutions to offset nutrient production resultant from their future developments. They are engaging with Norfolk Environmental Credits to explore the potential for sale of any resultant excess nutrient credits to other developers in the area. The Barratts/David Wilson Homes letter in appendix A of this response provides confirmation of this.
 - c. The Farming and Wildlife Advisory Group (FWAG) is preparing a formal proposal for nutrient neutrality mitigation which it intends to deliver in conjunction with Norfolk Environmental Credits. This has been confirmed by FWAG in their email in appendix A of this response.
 - d. The Nature Conservancy (TNC) has established the Norfolk Water Strategy Programme (NWSP) as a partnership with Water Resources East, Anglian Water and Norfolk County Council to develop the UK's first water fund to tackle water security issues and support freshwater conservation. TNC is working with the NWSP and landowners to prepare a proposal for nutrient neutrality mitigation for septic tank conversion to private package treatment plants or nature-based solutions to be delivered through Norfolk Environmental Credits.
 - e. As the situation with nutrient neutrality mitigation is fast-moving, further updates will be provided at the hearing session.

Conclusion

18. Overall, proactive work in Greater Norwich places the area in the forefront of delivering nutrient neutrality mitigation. Thus, from April 2023 the mitigation strategy including complementary and supporting measures such as the JDV and ongoing work from NE, will facilitate delivery of the plan in line with the requirements of the Habitats Regulations.

Appendix A - Correspondence from Nutrient Neutrality Mitigation Partners

Planning Advisory Service (PAS)

Dear Phil and Mike

I have been working to support the catchments subject to nutrient neutrality advice under a contract with the Department of Levelling Up Communities and Housing. I lead this work for England and have done so for 18 months.

We have put together a package of support and advice here, and we run a routine network meeting where we convene lead authorities from catchments to share emerging best practice and advice and meet with the national representatives from Natural England, Defra, Ofwat and others.

I am happy to confirm that the Norfolk catchment has been an effective and thoughtful contributor to the network, and others have remarked how quickly they have been able to move forward after the initial shock of the advice from Natural England.

Their programme of intervention in the catchment is the most ambitious I have seen, and I am impressed with the way it combines solutions in the short, medium and long term. They have definitely responded with strong leadership and a coordinated approach across stakeholders that is exemplary.

Regards
Richard

Richard Crawley

Programme Manager - Planning Advisory Service

Anglian Water

Dear Phil and Mike,

Further to our recent conversations, I can confirm that Anglian Water is fully aware of the challenges that Nutrient Neutrality has imposed upon the Greater Norwich area and its growth proposals as well as the wider catchment impact. As a result Anglian Water is highly supportive, and is strongly committed to working with others to provide and enable solutions which rapidly unlock housing development, and we are actively progressing internal approval processes which will lead to a final decision regarding whether Anglian Water is part of the Joint Venture Company, Norfolk Environmental Credits.

Anglian Water is also committed to working with the Joint Venture to deliver nutrient mitigation via improvements to our own infrastructure, including nature-based solutions, and enabling the provision of mitigation which can be sold to developers in the form of nutrient credits.

We look forward to working with you and other partners as we collaborate to enable sustainable development in the Greater Norwich area.

Very best regards,

Robin



Dr Robin Price CSci FIWater

Director of Quality and Environment

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon,
Cambridgeshire, PE29 6XU

Barratt David Wilson Homes



Phil Courtier & Mike Burrell
Broadland District Council and South Norfolk Council Thorpe
Lodge
1 Yarmouth Rd Norwich
NR7 0DU

28th February 2023

Dear Phil and Mike,

Barratt David Wilson Homes (BDW Anglia) are acutely aware of the constraints and challenges posed by Nutrient Neutrality to the Greater Norwich area and its growth proposals. BDW Anglia are proactively seeking solutions to offset nutrient production resultant from future developments and we are confident of securing such solutions in the short to medium term. Throughout the process we are happy to remain engaged with the Joint Venture Company, Norfolk Environmental Credits, to explore the potential for sale of any resultant excess nutrient credits to other developers in the area.

We will continue to communicate any progress made in this regard and are happy for you to contact should you require anything further in the meantime.

Yours sincerely,

Gareth Mears
Development Director
Barratt David Wilson Homes (Anglia)



Norfolk FWAG (Farm & Wildlife Advisory Group)

Townsend Room, MacGregor Building, Norfolk Showground,
Dereham Road, New Costessey, NR5 0TT.
E: advise@norfolkfwag.co.uk
P: 01603 817869

Mr Phil Coutier

Director of Place

Broadland land & South Norfolk District Councils.

Dear Phil

The Farming and Wildlife Advisory Group for Norfolk (NFWAG) has approximately 400 members who are farmers in the county. NFWAG is fully aware of the challenges that Nutrient Neutrality has imposed upon the Greater Norwich area and its growth proposals as well as the wider catchment impact. In response FWAG is preparing a formal proposal for Nutrient Neutrality mitigation which it would like to deliver in conjunction with the Joint Venture Company, Norfolk Environmental Credits.

FWAG already works very closely with Natural England, Forestry Commission, Woodland Trust, Broads Authority, Norfolk Rivers Trust, Norfolk Wildlife Trust and Water Resources East and many other local and national bodies in a collaborative way to deliver multiple environmental projects, including skylark mitigation and Countryside Stewardship/Higher Tier applications. We are also part of the FALMA network (moving to ETAFF next year) that Defra / Natural England uses to review and approve farmer options in Countryside Stewardship scheme with our Environmental Advisors having Technical Expertise Profiles (TEPs).

We are very confident that FWAG will be able to utilise its substantial membership and vast experience to help secure mitigation for nutrient neutrality in the next few months and deliver this mitigation in subsequent months and years. Throughout this time we will remain engaged with Norfolk Environmental Credits, to enable FWAG to trade the mitigation it secures in order that this can be sold to other developers in the form of nutrient credits.

Yours Sincerely

Clarke Willis. MBE. FRAGS.

Executive Director & Company Secretary