Greater Norwich Local Plan (GNLP) Policy 2: Sustainable Communities Supplementary Planning Document (SPD)







Draft for Consultation, November 2025

1. Introduction

- 1.1 This Supplementary Planning Document (SPD) supports the interpretation and effective implementation of Greater Norwich Local Plan (GNLP) Policy 2: Sustainable Communities. The Sustainable Communities policy is wide ranging. It covers ten key social, economic, and environmental issues which all developments must address through their design. It aims to ensure that the design of development is high quality, contributes to the establishment and maintenance of resilient and inclusive communities, promotes low carbon development and helps to address climate change. The SPD will be a material consideration when the councils make decisions on major planning applications.
- 1.2 Policy 2 requires supporting statements in relation to four topics: sustainability; master-planning; the timescales for delivering development, and health impact assessment. All major and more complex schemes will need to provide a Sustainability Statement with the thresholds for other supporting statements set out in table 1. Though they are subject to the policy's requirements, smaller development proposals do not need to provide supporting statements.
- 1.3 This SPD refers applicants to useful information sources including existing design toolkits and guidance that will help developers to design and evidence how their schemes comply with GNLP Policy 2. These information sources cover all ten aspects of the policy, which are:
 - access to services and facilities,
 - new technologies,
 - green infrastructure,
 - densities.
 - design,
 - inclusive and safe communities,
 - environmental protection,
 - flood risk.
 - water efficiency, and
 - water quality and energy consumption.
- 1.4 The information contained in this SPD is intended to be a helpful resource to developers in writing a sustainability statement to accompany their planning application. In addition, appendix 1 provides information about the requirement for water efficiency measures in new developments.

2. Purpose of the SPD

2.1 This SPD is intended to assist developers in preparing high-quality planning applications. The supporting statements required by GNLP Policy 2 are integral to

that process. Developers are recommended to follow the validation checklist that each of the Greater Norwich Councils publishes. Failing to provide the necessary documentation will delay or invalidate applications.

2.2 Taking the time to prepare the required supporting statements is an opportunity for a developer to showcase how their planning application is well-conceived and complies with GNLP Policy 2. Well written supporting statements may also assist in achieving a timely planning decision.

3. Statements Required to Support Planning Applications

3.1 Table 1 guides developers in understanding which, if any, of the supporting statements required by GNLP Policy 2 should be submitted as part of the documentation for their planning application.

Table 1: Scales of Development Requiring Supporting Statements

Sustainability Statement

- ✓ Residential developments of 10 or more dwellings
- ✓ Residential development on a site area of 0.5 ha or more and the number of dwellings is unknown
- ✓ Non-Residential Development of floorspace of 1,000 sqm or more
- ✓ Non-Residential Development on sites over 1 ha or more

Statement of Community Involvement covering Master-planning

- ✓ All major development requires a Statement of Community Involvement on consultation
- ✓ Housing development of 200 dwellings or more is encouraged to have participative community master-planning
- ✓ Non-residential development of 20,000 sqm or more is encouraged to have participative community master-planning

Delivery Statement

✓ Housing developments of 100 dwellings or more

Health Impact Assessment

- ✓ Allocated sites of 500 dwellings or more
- ✓ Non-allocated housing sites of 100 dwellings or more
- ✓ Housing proposals with a significant amount of housing for the elderly.

Sustainability Statements

3.2 The purpose of a Sustainability Statement is to evidence and explain, on a site-bysite basis, how the varied aspects of policy 2 are addressed. Writing a Sustainability Statement therefore provides the opportunity to show how a planning application is compliant with policy 2. The Sustainability Statement should be structured around the ten key social, economic and environmental issues listed in policy 2 as this will assist in the timely determination of planning applications.

- 3.3 Section 4 of this SPD and table 2 provide useful information sources that will inform developers about their scheme's design and help evidence how their scheme follows best practice. A Sustainability Statement must set out how all aspects of policy 2 will be addressed in a development, however there is no set length or prescriptive content.
- 3.4 A Sustainability Statement will vary in length depending on the complexity of the proposed scheme. A recommended approach is to avoid lengthy quotes and summaries from guidance documents. Those writing a Sustainability Statement should concentrate on explaining design concepts and technical details, including how risks are mitigated and opportunities for positive outcomes promoted, as this will best assist the planning application process.

Statement of Community Involvement

- 3.5 GNLP Policy 2 encourages developers on larger developments to undertake participative community engagement that involves methods such as public meetings, exhibitions, leaflets, and social media. The Statement of Community Involvement required by the validation checklists for each local authority for all major planning applications should report on what engagement has taken place, what was said and how the comments received shaped the resulting planning application.
- 3.6 The statement does not need to be a lengthy document, but it should assist in the planning application process by highlighting controversial matters raised by the community and other affected stakeholders. Those writing a statement are advised to document how the proposed scheme evolved following consultation, as well as being frank about those concerns from the community they feel unable to resolve.

Health Impact Assessments

3.7 These assessments will demonstrate how the health care needs of specific types and scales of new development will be provided for. They must include an assessment of the current health care provision in the area and identify how the additional health care needs created by the development will be met. This must take account of the likely demographic characteristics of the future residents of the development.

Delivery Statements

- 3.8 Large scale housing applications must be accompanied by a Delivery Statement that explains when and by whom that scheme will be built. These statements are aimed at supporting timely delivery of development, a priority for the GNLP. They will also guide ongoing contact between the planning authorities and developers.
- 3.9 Delivery Statements do not need to be lengthy documents, but they must include site specific information and be realistic in their forecasts. The Delivery Statement must include information about site ownership, land assembly, legal agreements, intentions to market the site to homebuilders or commercial end-users, lead-in times from permission to start on site, discharging planning conditions, mobilising construction contractors and forecasts for annual completions.
- 3.10 Where delivery cannot be demonstrated to be in accordance with agreed delivery plans for individual sites, the authorities could make use, where necessary, of their legal powers to bring about strategically significant development, including compulsory purchase. In considering the use of such powers regard will be had to any change of circumstances that might affect delivery, particularly economic factors, and the Delivery Plan will need to be updated accordingly.
- 3.11 The requirement for Delivery Plans accords with government's legislative changes in the 2023 Levelling Up and Regeneration Act to encourage developers to build out faster.
- 3.12 The statements will assist the Greater Norwich authorities in collecting and updating information about when and by whom a scheme will be built. Such information is part of a Council's strategic planning function. Without reliable data about when a permitted scheme will build out, the coordinated provision of new homes, jobs, utilities and supporting infrastructure like schools and healthcare becomes more challenging.
- 3.13 The Greater Norwich authorities will contact developers on at least an annual basis about the progress of schemes. It is important that developers respond to data requests on matters such as delivery trajectories, site phasing, infrastructure investment and environmental indicators. This is necessary for both data returns the Councils must make to Government and for informing the Annual Monitoring Report that tracks the implementation and effectiveness of the GNLP.

4. Issues to Consider in Sustainability Statements

4.1 Site promoters are advised to refer to table 2 when writing a Sustainability Statement to accompany their planning application. Policy 2 references use of

- national and local design guides and codes to ensure good urban design. It encourages, but does not require, the use of the Building for a Healthy Life (BHL) design tool, or any equivalents or future successors, for housing developments.
- 4.2 The use of BHL from the inception of a scheme is recommended for many of the issues to be addressed through a Sustainability Statement (see table 2). The use of BHL, or other similar design tools, can also help to frame pre-application discussions between developers and planners. The information in table 2 and the links to sources of guidance will assist in explaining and evidencing compliance with GNLP Policy 2. Preferably, the Sustainability Statement should be structured around the ten key social, economic, and environmental issues listed in Policy 2.

Table 2: Key Requirements of Policy 2

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
1. Access to services and facilities	 Convenient, safe, and sustainable access to new on-site services and facilities or to existing facilities as appropriate. Layouts that encourage walking and cycling to support healthy lifestyles. Site design to promote public transport use and accommodate parking without over dominating the site or providing a hazard. 	 A Sustainability Statement which includes: Information to demonstrate how the proposal ensures sustainable and convenient access to services and facilities. A 'Services and Movement' map with supporting text and annotations. This should show any onsite services and movement routes both across the development site and to services onsite and nearby. This map should also show how the development prioritises active travel modes and public transport. 	 Building for a Healthy Life Streets for a Healthy Life: A companion guide (2022) National Model Design Code National Design Guide Sport England Active Design Guide - 10 principles Parking Guidelines for new development in Norfolk

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
2. New Technologies	 Delivery of a broad range of existing, developing and future technologies, with a current focus on broadband, fibre optic and telecommunication networks. Broadband infrastructure to be provided for all new developments with a preference for Fibre to the Premises where practical. New sites to be registered with broadband infrastructure providers. The provision of charging points for electric vehicles. 	 A Sustainability Statement which includes: Information to demonstrate that charging points for electric vehicles will be provided. Information to demonstrate that the proposal will meet the broadband requirements as specified in the policy e.g. For all residential developments over 10 dwellings and all employment developments: Fibre provision to the Premises (FTTP) for high connection speeds. For smaller schemes: FTTP will be provided where practical. Where this is not possible, then non-next Generation Access (NGA) technologies that can provide speeds more than 24Mbps should be delivered. 	 New build connectivity: information for developers - GOV.UK Parking Guidelines for new development in Norfolk includes electric charging points guidance. Connecting electric vehicles and heat pumps to the networks (Energy Networks Association)

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
3. Green Infrastructure	 Provision of on-site or off-site green infrastructure including landscaping, street trees and other tree planting. Link and contribute to the further development of an area-wide green infrastructure network. Take account of the Greater Norwich Green Infrastructure Strategy and Delivery Plan (2025) (SPD in progress) and other relevant GI projects in the area. 	 A Sustainability Statement which includes details of: On-site or off-site green infrastructure provision including connectivity with other GI projects in the vicinity, including a map. In practice, the great majority of green infrastructure provided under GNLP policy 2 will be likely to be on-site as almost all developments should be able to make some on-site provision. Off-site provision is more likely to meet the requirements of GNLP policy 3 (see the separate SPD for this policy). How GI proposals take account of the Greater Norwich Green Infrastructure Strategy (2025) and other relevant documents for the area. How GI proposals result in people experiencing nature on a daily basis, such as integrating GI with active travel routes. Any green roofs, rain gardens and blue- green walls (vegetated water filters that use plants to remove nutrients and pollutants). How the development will deliver at least 10% biodiversity net gain. Climate resilience of species used in planting schemes. Maintenance arrangements to ensure successful establishment and longevity of planting schemes. 	 Building for a Healthy Life Policy 3 SPD (in progress) Green Infrastructure Framework (NE) Greater Norwich Green Infrastructure Strategy and Delivery Plan (2025) Emerging Local Nature Recovery Strategy For Developments in Broadland East Broadland GI Projects West Broadland GI Projects NE Growth Triangle GI Delivery Plan For Developments in Norwich River Wensum Strategy Landscape and Trees SPD (2016) Norwich Biodiversity Baseline Study (2024) Parks and Green Spaces Strategy 2025-2035 Biodiversity Strategy 2022-32 Tree plan (in progress)

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
4. Efficient Use of land/ Densities	 Development should make efficient use of land. In Norwich development should achieve a density of at least 40 dwellings per hectare. Elsewhere in the plan area the minimum net density should be 25 dwellings per hectare. 	 A Sustainability Statement which shows the overall density of housing developments and, where relevant, sub-divisions within the site (preferably using a map). There should be: Higher densities on sites in Norwich, especially in the city centre, in and close to district centres and on public transport routes. The statement should also include consideration of the suitability of the most accessible sites in Norwich for low or car-free housing. In Broadland and South Norfolk, densities should be higher in and close to defined district and town centres and there should be lower densities towards areas of lesser activity and along green corridors, towards settlement edges and where development borders countryside. 	 Building for a Healthy Life National Model Design Code National Design Guide Increasing Residential Density in Historic Environments Historic England

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
5. Design	Provision of well-designed places and buildings which respect and enhance local character and take account of both existing and new design guidance.	A Sustainability Statement that cross- refers to the Design and Access Statement which explains how the proposed development is a suitable response to the site and its setting and can demonstrate that it can be adequately accessed by prospective users. The Sustainability Statement should have regard to: Local design codes and design guides. The National Design Guide (and any subsequent related publications) Building for a Healthy Life (or any successor) (optional). Local Landscape Character Assessment Guidelines Conservation Area Appraisals (where relevant) Ensuring climate resilience.	 Building for a Healthy Life Streets for a Healthy Life: A companion guide (2022) What is a Design and Access Statement? - Planning Portal National Model Design Code National Design Guide BREEAM Refurbishment and fit out Tall Buildings: Historic England Advice Note 4 Increasing Residential Density in Historic Environments Historic England Conservation Area Appraisals Landscape and Trees SPD (2016) Car Parking (DM31) For Developments in Broadland Broadland Design Codes (in progress) Broadland Place Shaping Guide (2012) Broadland Landscape Character Assessment SPD particularly relevant for the more rural parts of the district.

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
			For Developments in South Norfolk
			 South Norfolk Place-Making SPD(2012)
			 South Norfolk Design Codes SPD –
			(in progress)
			Parking Guidelines for new
			development in Norfolk
			 South Norfolk Landscape Character
			Assessment.
			Advice Note on Planning for Waste
			and Recycling (2021)

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
6. Inclusive and Safe Communities Requirement	 An inclusive, resilient, and safe community through the provision of facilities and services commensurate with the scale and type of the development. The design and layout of development reflecting best practice to deter crime. 	 A Sustainability Statement which demonstrates that Secured by Design principles have been considered from the start of the design process. The design and layout of development reflects best practice to deter crime by including for example: Buildings around the edges of a space Active frontages along its edges, provided by entrances onto the space and windows overlooking it, so that people come and go at different times. Natural surveillance from inside buildings provided by windows and balconies, so that users of the space feel they might be overlooked by people from inside. Reasons for people to enter into the space, for an activity or destination or because it is on a natural line of direction of travel. 	Secured by Design Development Guides

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
7. Environmental Protection	Avoid risks of unacceptable levels of soil, air, water and noise pollution and/or land instability.	 A Sustainability Statement which demonstrates that development: Separates un-neighbourly uses. Deals with water and air pollution. Effectively manages noise. Depending on the site location, constraints and the proposal a Noise Impact Assessment may be required in accordance with each authority's validation checklist with appropriate mitigation measures. These measures may include acoustic barriers/fencing, noise insulation in buildings, and landscape buffers. Deals with land contamination and instability. Remedial measures may include on-site treatment or excavation and removal/treatment of unsuitable or contaminated soils. Maximises onsite waste and spoil retention and use through materials re-use and recycling approaches. Minimises offsite waste arisings such as through modern methods of construction. 	 Noise Policy Statement for England Land contamination: technical guidance - GOV.UK Land stability - GOV.UK Greater Norwich SFRA Level 2 For Developments in Broadland / South Norfolk Advice Note on Planning for Waste and Recycling (2021).

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
8. Flood Risk	 Avoid locating inappropriate development in areas at risk of flooding Apply the sequential test Apply the exceptions test Ensuring flood risk is not increased elsewhere Incorporate Sustainable drainage systems (unless there is clear evidence that this would be inappropriate) Any mitigation required, mainly in parts of Norwich City Centre and East Norwich, will be guided by the Level 2 Strategic Flood Risk Assessment. 	 A Sustainability Statement which includes information about how development: Avoids development on any areas at risk of surface water or fluvial flood or which are impacted by sea level rise. Incorporates mitigation measures guided by the Level 2 SFRA (for Norwich City Centre and East Norwich). Integrates Sustainable drainage systems and above ground measures, such as rainwater butts and tanks to mitigate the impact of heavy rainfall events. This will be in addition to the requirement for a site-specific flood risk assessments on certain sites as set out in footnote 63 of the NPPF. 	 Flood risk and coastal change advice Building for a Healthy Life (2020) (for SUDS), Planning Practice Guidance on SUDS Sustainable drainage The new Flood Zones data can be accessed via Defra Data Services Platform Get flood risk information for planning in England - Flood map for planning - GOV.UK

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
9. Water Efficiency	 Ensure a high level of water efficiency. Housing development will meet the Building Regulations part G (amended 2024 water efficiency higher optional standard, or any equivalent successor). Non-housing development will meet the BREEAM "Very Good" water efficiency standard, or any equivalent successor. 	Sustainability Statement which includes details on the measures taken to meet the policy requirements.	See Appendix 1.

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
10. Water Quality and Energy	 Protect water quality. Ensure a low level of energy consumption with development proposals taking account of landform, layout, building orientation, massing and landscaping to minimise energy consumption and the risk of overheating. Provide for the use of sustainable energy, local energy networks and battery storage where appropriate. 	 A Sustainability Statement which evidences how the development: Protects water quality Utilises nature-based solutions to improve water quality, mitigate flood risk and moderate surface temperatures Ensures low levels of energy consumption in both construction and occupation phases. Is designed and orientated to minimise energy consumption and provide for sustainable energy generation. Reduces the risk of overheating now and in projected future climate scenarios Uses sustainable energy including electricity supplied from local distribution network operators, heat pumps, heat networks, local smart energy networks and battery storage (where appropriate). Avoids combustion technologies for heating, waste treatment and electricity generation. Measures to implement the policy could include: 	 The Future Homes and Building Standards (in progress) Connecting electric vehicles and heat pumps to the networks – Energy Networks Association (ENA) Technical Memorandum 59: Design methodology for the assessment of overheating risk in homes CIBSE BREEAM UK New Construction 2018 - Cover LETI Climate emergency Design Guide (January 2020) Whole Life Carbon Assessment for the built environment

Policy 2 issue number	Policy requirements	Information required to demonstrate compliance	Useful Resources
		 Semi-islanded approaches including high levels of on-site, renewable or low carbon generation and batteries. Demand side response approaches, where on-site electricity demand can be varied in response to network signals. Low carbon heat networks with centralised energy centres and heat batteries as appropriate Private investment in energy infrastructure delivered through Energy Services Companies. 	

Appendix 1: Water Efficiency

Residential developments

- 1. Whilst part G of the Building Regulations was amended in May 2024, the higher optional standard required by GNLP Policy 2 was not changed and currently remains at 110 litres/person per day. As policy 2 requires "any equivalent successor" to the 2016 Building Regulations, this appendix refers to the 2024 Building Regulations.
- The regulation 36 2(b) optional higher water efficiency requirement of 110 litres /person/day is set out in <u>part G2 of the 2024 Building Regulations</u>. When completing Building Regulations assessments, the applicant must use the water efficiency calculator in part G2 appendix A. Planning conditions will be applied (see annex A below).

Non-residential development

3. Policy 2 requires non-residential development to meet at least the BREEAM "Very Good" water efficiency standard, or any equivalent successor. The equivalent successor now in place is the **four credit rating**. Details on BREEAM assessments are on the BREEAM website (see Wat 01 Water Consumption, including table 35).

Planning applications

- 4. Water efficiency will be one of the policy requirements to be discussed by development management planners and developers at the earliest stages of the design and planning application process.
- 5. Standard water conditions (see annex A) will be applied to relevant planning permissions. The conditions for **non-residential development** require that a BREEAM assessment is submitted and agreed in writing by the local planning authority, prior to occupation. For housing development, this will be addressed though the conditions below related to the Building Regulations.
- 6. It will be important that developers inform residents and other users of their developments of both the advantages of installed water efficiency devices and systems and of any issues related to long-term maintenance.

Looking ahead

7. The Environment Act 2021 sets a target to reduce the use of public water supply in England per head of population by 20% by 2037-38 from the 2019-20 baseline. This

is particularly important in the Greater Norwich, which is classified by the Environment Agency as being water stressed.

- 8. Policy 2 has been drafted to refer to "any equivalent successor" to the higher optional standard in the Building Regulations. If the government amends the higher optional standard of the Building Regulations, this appendix will be updated to reflect such a change.
- 9. June 2025 guidance Shared Standards in Water Efficiency for Local Plans provides evidence on the need and policy drivers for water efficiency in the East of England and on feasibility and viability. It recommends that "new homes ... aim to achieve a design standard of up to 85 litres/person/day (l/p/d) for residential developments. Where there is insufficient justification for 85 l/p/d, for example on viability grounds or local environmental risks, there could still be a case for a design standard that is more stringent than building regulations e.g. 90 or 95 l/p/d". It also recommends that non-household development, "should aim to achieve full credits in the BREEAM water calculator". Given that water efficiency is such a key issue in the Greater Norwich area, achieving such high standards in development would be welcomed.

Annex A Standard water conditions

For housing

The development hereby approved shall be designed and built to meet the regulation 36 2(b) requirement of 110 litres/person/day water efficiency set out in part G2 of the 2024 Building Regulations.

REASON: To ensure the development is constructed to an appropriate standard in accordance with Policy 2 Sustainable Communities of the Greater Norwich Local Plan (adopted March 2024).

For non-residential schemes

No occupation of the development hereby approved shall take place until an accredited Pre-Construction stage BREEAM assessment has been submitted to and agreed in writing by the local planning authority. The assessment must confirm that the development will be constructed to achieve at least four credits for BREEAM water usage (see <u>table 35</u> of the <u>BREEAM Non-domestic Buildings (United Kingdom)</u> <u>Technical Manual SD5076: 5.0 – 2014</u>). The development shall be carried out in complete accordance with the assessment as agreed and shall be retained as such thereafter.

REASON: To ensure the development is constructed to an appropriate standard in accordance with Policy 2 of the Greater Norwich Local Plan (adopted March 2024)

Mixed use schemes require both

Annex B BREEAM Assessments for non-domestic buildings

As part of a BREEAM assessment, a score (ranging from 1 to 5, with a higher "exemplary" score) is given for water efficiency using the BREEAM Wat 01 water consumption calculator. Water consumption (litres/person/day) for the assessed building is compared against a notional baseline performance and BREEAM credits awarded in table 35 as follows:

% Improvement	No. of BREEAM credits
12.5%	1
25%	2
40%	3
50%	4
55%	5
65%	Exemplary performance

When submitting applications for non-domestic buildings, applicants will need to supply Design Stage BREEAM assessments as part of the water efficiency element of their Sustainability Statement. These must contain the following:

- Completed copy of the BREEAM Wat 01 calculator showing that at least a fourcredit rating will be achieved.
- 2. Relevant section/clauses of the building specification/ design drawings confirming technical details of:
 - Sanitary components
 - o Rainwater and greywater collection system

OR where detailed documentary evidence is not available at this stage;

A completed BREEAM Wat 01 calculator and a letter of instruction to a contractor/supplier or a formal letter from the developer giving a specific undertaking, providing sufficient information to allow the water calculations to be completed.