

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



## **Consultation Report, January 2026**

## **1.0 Purpose of this Document**

1.1 This purpose of this report is to summarise how Broadland District Council, Norwich City Council and South Norfolk Council involved communities and stakeholders in preparing the Policy 2: Sustainable Communities Supplementary Planning Document (SPD). It summarises the responses received to the consultation and sets out how these comments informed the final version of the plan.

## **2.0 Details of the consultation**

2.1 The consultation commenced on Monday 10<sup>th</sup> November 2025 and ended on Friday 19<sup>th</sup> December 2025. Norwich City Council's Statement of Community Involvement (SCI) sets out a requirement to consult on SPDs for the minimum statutory period of 28 calendar days. Whilst Broadland and South Norfolk's SCIs also require a minimum period of 4 weeks, member preference is for 6 weeks to allow Town and Parish Councils the chance to comment and therefore the longer period was adhered to.

2.2 The consultation document (Draft Policy 2: Sustainable Communities SPD) along with the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report and Equality Impact Assessment were available on the Norwich City Council website for the duration of the consultation. Broadland and South Norfolk's website included information about the consultation and directed interested parties to Norwich City Council's website for more information about the documents and for details on how to respond.

2.3 Consultation methods accorded with the SCIs for all three authorities. A variety of methods were used which included:

- Email to statutory consultees
- Emails to all groups and individuals on the Norwich City Council plan-making database
- Emails to all Broadland and South Norfolk Parish and Town Councils.
- Emails to Development Forum
- LinkedIn
- Social media
- Press release
- Councils' websites
- Paper documents in City Hall and the Horizon Centre.

2.4 Feedback could be submitted by email and post.

### **3.0 Responses to the consultation**

3.1 The following bodies/individuals responded to the consultation.

- Environment Agency
- Historic England
- Natural England
- Anglian Water
- Norfolk County Council
- Broads Authority
- Breckland District Council
- National Highways
- Sports England
- The Coal Authority
- Norfolk Police (Designing Out Crime Officer)
- Norfolk Wildlife Trust
- Norwich Climate Commission
- CAMRA (Campaign for Real Ale)
- Redenhall with Harleston Town Council
- Nigel Hargreaves
- Simeon Jackson
- David Barton

3.2 A summary of the comments received is in Appendix 1. This also includes the Council's response to the comment and proposed changes to the SPD to take account of the comments as appropriate.

### **4.0 Summary**

4.1 The responses to the consultation have helped inform the final version of the SPD.

## Appendix 1: Consultation comments

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
<b>Environment Agency</b>	<p><b>3. Green Infrastructure</b> Support submission of Sustainability Statements to demonstrate compliance with GI element of Policy 2. We are satisfied that the Sustainability Statement must take account of the Greater Norwich Green Infrastructure Strategy (2025), which sets out the benefits of blue-green infrastructure. Green-blue infrastructure proposals should use local evidence bases, such as the <a href="#">Greater Norwich Strategic Flood Risk Assessment</a>, <a href="#">Greater Norwich Water Cycle Study</a>, <a href="#">Anglian Water's Water Resources Management Plan</a> and <a href="#">Drainage and Wastewater Management Plan</a>, <a href="#">Anglian River Basin District River Basin Management Plan</a>. Support the inclusion of the Emerging Local Nature Recovery Strategy.</p>	<p>Support noted.</p> <p>Other more relevant resources are already listed.</p>	<p>No change.</p>
<b>Environment Agency</b>	<p><b>7. Environmental Protection</b> The SPD does not make it explicit that development must protect surface and groundwater. Development on land which could be affected by contamination must follow the risk management framework provided in <a href="#">Land Contamination Risk Management</a>. Development must minimise offsite waste by maximising “onsite waste and spoil retention and use through materials re-use and recycling approaches”. Where demolition and waste removal is found to be justified, the waste must be treated at a suitably permitted site. We recommend referencing <a href="#">Definition of Waste: Development Industry Code of Practice</a> and <a href="#">Waste Management</a>.</p>	<p>Agree could be strengthened.</p>	<p>After ‘Deals with water and air pollution’ add ‘and addresses potential pollution to groundwater.’</p> <p>Include link to <a href="#">Land Contamination Risk Management</a></p> <p>After ‘Minimises offsite waste arisings such as through modern methods of construction.’ Add ‘Any waste must be treated at a suitable permitted site.’</p>

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
			Include links to: <a href="#">Definition of Waste: Development Industry Code of Practice</a> and <a href="#">Waste Management</a>
<b>Environment Agency</b>	<p><b>8. Flood Risk</b>            Avoiding <i>all</i> development in areas at risk of flooding may not be possible, as acknowledged by the requirement for “mitigation measures guided by the Level 2 SFRA (for Norwich City Centre and East Norwich)”. The key is avoiding locating <i>inappropriate</i> development in areas at risk of flooding. Drainage systems should be designed to manage risks to groundwater and avoid overloading combined sewers. Incorporating green and blue infrastructure will aid sustainable drainage.</p> <p><b>Useful resources</b></p> <ul style="list-style-type: none"> <li>- <a href="#">Flood risk emergency plans for new development, Environment Agency and ADEPT, 2019</a> -</li> <li>- <a href="#">National standards for sustainable drainage systems - GOV.UK</a></li> <li>- <a href="#">The SuDS Manual (C753), CIRIA, 2015</a> -</li> <li>- <a href="#">Code of practice for property flood resilience (C790F)</a></li> <li>- <a href="#">Flood mobile virtual tour</a></li> <li>- <a href="#">Environment Agency and Town &amp; Country Planning Association introductory video on addressing flood risk through the planning system in England</a></li> </ul>	<p>Agree – need to add the word ‘inappropriate’.</p> <p>Further information to be added regarding drainage systems.</p> <p>Include additional resources.</p>	<p>Change first bullet point to include the word ‘inappropriate’.</p> <p>After ‘Integrates Sustainable drainage systems and above ground measures, such as rainwater butts and tanks to mitigate the impact of heavy rainfall events’ add ‘to manage risks to groundwater and avoid overloading combined sewers. Incorporating green and blue infrastructure will aid sustainable drainage.’</p> <p>Include links to:  <a href="#">Flood risk emergency plans for new development, Environment Agency and ADEPT, 2019</a> -</p>

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
			<a href="#">National standards for sustainable drainage systems - GOV.UK</a> <a href="#">The SuDS Manual (C753), CIRIA, 2015 - Code of practice for property flood resilience (C790F)</a> <a href="#">Flood mobile virtual tour Environment Agency and Town &amp; Country Planning Association introductory video on addressing flood risk through the planning system in England</a>
<b>Environment Agency</b>	<p><b>9. Water Efficiency</b>  Support requirement for water efficiency measures to be demonstrated in Sustainability Statements. Strongly recommend developers investigate the possibility of achieving the higher standards set out in the <a href="#">Shared Standards in Water Efficiency for Local Plans</a> document, which we are pleased to see referenced in Appendix 1.</p> <p><b>Useful resources</b></p> <ul style="list-style-type: none"> <li>- Rainwater harvesting guidance: <a href="https://www.waterwise.org.uk/knowledge-base/identifying-policy-options-for-incentivising-rainwater-harvesting-and-grey-water-recycling-systems-in-the-uk/">https://www.waterwise.org.uk/knowledge-base/identifying-policy-options-for-incentivising-rainwater-harvesting-and-grey-water-recycling-systems-in-the-uk/</a> and</li> </ul>	<p>Noted. Amend the text of the guidance to <b>recommend</b> developers investigate the possibility of achieving the higher standards set out in the <a href="#">Shared Standards in Water Efficiency for Local Plans</a> document. The GNLP Review will consider the potential for requiring rather than recommending higher standards than those set in GNLP policy 2.</p>	<p>Add: It is recommended that developers investigate the possibility of achieving the higher standards set out in the <a href="#">Shared Standards in Water Efficiency for Local Plans</a> document.</p>

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	<p><a href="https://www.waterwise.org.uk/knowledge-base/independent-review-of-costs-and-benefits-of-rwh-and-gwr-options-in-the-uk/">https://www.waterwise.org.uk/knowledge-base/independent-review-of-costs-and-benefits-of-rwh-and-gwr-options-in-the-uk/</a></p> <ul style="list-style-type: none"> <li>- Water stressed areas – 2021 classification <a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a></li> <li>- BREEAM water efficiency standard - <a href="https://www.designingbuildings.co.uk/wiki/BREEAM_Water_consumumtion">https://www.designingbuildings.co.uk/wiki/BREEAM_Water_consumumtion</a></li> </ul>		
<b>Environment Agency</b>	<p><b>10. Water Quality</b></p> <p>Support requirement for measures to protect water quality to be demonstrated in Sustainability Statements. Capacity at Waste Water Treatment Works could have implications for development. Applicants should seek advice from Anglian Water to ensure available capacity.</p> <p>Removing surface water from combined sewers can help free up capacity. Drainage should be designed to attenuate and slow down surface water run off.</p>	Additional sentence added to address issue of capacity further to Anglian Water comments.	After 'Protects water quality' add 'includes a sustainable point of connection to the wastewater network and that there is sufficient treatment capacity available, so as not to cause environmental harm.'
<b>Historic England</b>	<p>Historic England supports the SPD. This document provides a helpful summary of the key considerations for Policy 2: Sustainable Communities of the GNLP and useful references for preparing Sustainability Statements. HE welcome inclusion of key documents such as advice on residential density, tall buildings, and conservation area appraisals. Recommend adding references to Heritage Impact Assessments that were prepared to inform site allocations and Historic Landscape Characterisation.</p>	Agree	<p>Include links to: <a href="#">Historic Landscape Characterisation: a Tool for Understanding and Managing Whole Areas   Historic England</a></p> <p>Refer to Heritage Statements for Site allocations</p>

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
			<a href="#">B. Evidence library   GNLP</a>
<b>Historic England</b>	Historic England supports urgent climate action and emphasizes that historic environments must adapt to support Net Zero and climate resilience. Whilst the SPD focuses primarily on new development, sites may include historic elements. Reference should be made to <a href="#">HEAN 18: Adapting Historic Buildings for Energy and Carbon Efficiency</a> . When considering energy efficiency measures Historic England recommends taking a <a href="#">whole building approach</a> . The SPD should also highlight that the repair, maintenance, continued use and reuse of buildings is one of the easiest ways to avoid the unnecessary release of additional carbon and the generation of waste associated with demolition and new build. The greenest buildings already exist.	Whilst these are useful documents they are not particularly applicable to this SPD which primarily focuses on new development.	No change.
<b>Natural England</b>	Natural England welcomes and supports the draft SPD.  <b>3. Green Infrastructure</b> Recommend adding <a href="#">Natural England Green Infrastructure Planning and Design Guide 2023</a> and <a href="#">Standards Form — Building with Nature</a> .	Agree	Include <a href="#">Natural England Green Infrastructure Planning and Design Guide 2023</a> and <a href="#">Standards Form — Building with Nature</a>
<b>Natural England</b>	If the SPD requires a Strategic Environmental Assessment or Habitats Regulations Assessment, you must consult Natural England. We agree with your Authorities' reasoning as to why the SPD will not require SEA or an HRA.	SEA and HRA scoping exercise undertaken and sent to NE and available on website. Response received from NE which confirmed no specific comments on the screening report.	No change.

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
Anglian Water	Anglian Water supports requiring Sustainability Statements for major developments to demonstrate compliance with Policy 2. Delivery Statements will be useful to ascertain lead in times and delivery rates to ensure infrastructure investment can be planned accordingly. Anglian Water encourages developers to engage them. Anglian Water is committed to sustainable growth, collaborating with stakeholders to address capacity challenges, and advocating for policy changes that enable strategic investment ahead of demand.	Noted.	No change.
Anglian Water	<p><b>3. Green Infrastructure</b> Green Infrastructure (GI) benefits should primarily be delivered onsite, emphasizing its multifunctional role in flood risk management through SuDS and integrated water management, including rainwater harvesting and reuse.</p> <p><b>7. Environmental Protection</b> Support need for sustainability statement to demonstrate that proposals address water and air pollution. Table 8/ Policy 2 clause 7 of the GNLP sets out that development should protect surface and groundwater.</p> <p><b>8. Flood Risk</b> Anglian Water requests <a href="#">Surface Water Risk Management Guidance</a> is referenced in the useful resources section.</p> <p><b>9. Water Efficiency</b> Support reference to Shared Standards in Water Efficiency for Local Plans.</p> <p><b>10. Water Quality and Energy</b></p>	<p>3. Agree could be strengthened.</p> <p>7. Noted</p> <p>8. Agree.</p> <p>9. Noted</p> <p>10. Agree</p>	<p>Add new bullet point</p> <ul style="list-style-type: none"> <li>• ‘Any multifunctional benefits that arise from GI in terms of sustainable drainage (including bioretention structures such as tree pits, planted filter drains, wetlands and basins/ponds) and integrated water management (rainwater harvesting and reuse).’</li> </ul> <p>Include <a href="#">Surface Water Risk Management Guidance</a></p> <p>After ‘Protects water quality’ add ‘includes a sustainable point of connection to the</p>

	<b>Comment</b>	<b>NCC/BDC/SNC response</b>	<b>Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)</b>
	Applicants must demonstrating a sustainable point of connection to our wastewater network and sufficient treatment capacity is available, so as not to cause environmental harm. This should be appropriately addressed through the submission of a foul drainage strategy/assessment.		wastewater network and that there is sufficient treatment capacity available, so as not to cause environmental harm.'
<b>Norfolk County Council (LLFA)</b>	The LLFA notes that while flood risk and water quality benefits are mentioned in the introduction, sustainable drainage (SuDS) is only briefly addressed throughout the document. Key technical guidance, such as the LLFA's Developer Guidance, SuDS Manual, and Natural Flood Management Manual, is not referenced, nor is the Local Flood Risk Management Strategy for Norfolk. Table 2 mentions limited SuDS elements, omitting common features like tree pits, wetlands, and basins. Overall, the report lacks clear identification of opportunities to realize flood risk benefits and does not indicate whether the LLFA was consulted during the SPD's preparation.	Agree additional information should be added re SuDs.	<a href="#">Information for developers - Norfolk County Council</a> included within Green Infrastructure and Flood risk sections.  Within GI section additional bullet point added: 'Any multifunctional benefits that arise from GI in terms of sustainable drainage (including bioretention structures such as tree pits, planted filter drains, wetlands and basins/ponds) and integrated water management (rainwater harvesting and reuse).'
<b>Norfolk County Council</b>	NCC Public Health supports the SPD for its strong emphasis on creating sustainable, well-designed places that promote healthy lifestyles. NCC particularly welcomes clear expectations around active travel, access to services, green	Agree more focus could be places on inclusive elements.	Add additional bullet point within section 6.

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
<b>(Public Health)</b>	<p>infrastructure, climate resilience, and environmental protection (e.g., air quality).</p> <p><b>6. Inclusive and Safe Communities</b> Suggest emphasising inclusivity alongside safety, highlighting accessible focal points and multi-use spaces to foster community cohesion.</p> <p><b>Health Impact Assessments (HIAs):</b> Welcome their inclusion but note the current description is too narrow, focusing mainly on healthcare infrastructure. A robust HIA should also address wider determinants of health—such as green space, air quality, noise, housing quality, transport, and health inequalities—and reference established methodologies such as <a href="#">HUDU Planning for Health Rapid Health Impact Assessment Tool</a>.</p>	<p>The policy requires HIAs to focus on the provision of healthcare infrastructure and service capacity. Other suggested aspects to be covered by HIA are covered by the policy content and its Sustainability Statement requirement, thus do not need to be repeated in HIA.</p>	<ul style="list-style-type: none"> <li>• Accessible focus points and multi-use spaces/meeting places are provided to foster community cohesion.</li> </ul>
<b>Broads Authority</b>	<p><b>1. Access to services and facilities</b></p> <ul style="list-style-type: none"> <li>• Include a requirement to explain alignment with the LCWIP</li> <li>• Consider sustainable access to recreational facilities, especially for villages that overlap with the Broads.</li> </ul> <p><b>5. Design</b></p> <ul style="list-style-type: none"> <li>• Add a bullet point about the setting of the protected landscape within the Broads.</li> </ul> <p><b>7. Environmental Protection</b></p> <ul style="list-style-type: none"> <li>• Consider presence of peat soils.</li> </ul>	<p>1) The main purpose of the Greater Norwich Local Cycling and Walking Infrastructure Plan is to set out improvement schemes to the network that will enhance levels of cycling and walking so not considered to be overly relevant to this SPD.</p> <p>2) No particular services and facilities are listed so it would not be appropriate</p>	<p>No change</p>

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
		<p>to highlight recreational facilities near the Broads.</p> <p>3) Referring to the landscape setting of the Broads is considered too specific.</p> <p>4) Referring to peat soils is considered too specific.</p>	
<b>Broads Authority</b>	Need to clarify whether the SPD applies to the Broads Authority Area.	Clarify that the SPD does not apply to the Broads Authority area.	Add within paragraph 1.1 'It applies to the administrative areas of Broadland District Council, Norwich City Council, and South Norfolk Council, excluding the Broads Authority Executive Area.'
<b>Breckland District Council</b>	No comment	Noted	No change
<b>National Highways</b>	No comment	Noted	No change
<b>Sport England</b>	Sport England supports the proposals and welcomes the focus on sustainable, healthy, and inclusive communities. Recommend including Sport England's <a href="#">Active Design guidance</a> which promotes building and space designs that encourage physical activity—such as walking, cycling, and play—helping embed movement into daily life. Its inclusion	Agree	Include <a href="#">Active Design guidance</a> under item 5.

	<b>Comment</b>	<b>NCC/BDC/SNC response</b>	<b>Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)</b>
	would align with the Council's Local Plan vision and provide applicants with nationally recognized best practices for high-quality, health-focused design.		
<b>The Coal Authority</b>	No comment	Noted	No change
<b>Norfolk Police (Designing Out Crime Officer)</b>	<p><b>3. Green Infrastructure</b> Award schemes like Green Flag aim to improve safety and accessibility in parks, promoting physical and mental health benefits. However, research shows women and girls often feel unsafe in these spaces. Police Crime Prevention Initiatives (Police CPI) <a href="#">Design Guide Safer Parks</a> advocates for inclusive, well-designed public spaces to enhance safety and access for all and should be included within the Useful Resources.</p> <p>The <i>Secured By Design (SBD)</i> <a href="#">RESIDENTIAL GUIDE 2025 27325.pdf</a> emphasizes design principles for communal areas and play spaces to prevent crime and anti-social behaviour, including clear visibility, defined boundaries, effective lighting, long-term maintenance, and careful location planning. These guidelines should be integrated into planning documents to create safer, inclusive communities.</p>	<p>Agree that <a href="#">Design Guide Safer Parks</a> should be included.</p> <p>Link is already included to Secured by Design Development Guides which includes the Residential guide. It is not the purpose of the SPD to go into significant levels of detail but instead to signpost people to the relevant information.</p>	Add <a href="#">Design Guide Safer Parks</a> to 3. Green Infrastructure and 6. Inclusive and Safe Communities
<b>Norfolk Police (Designing Out Crime Officer)</b>	<p><b>6. Inclusive and Safe Communities</b> Inclusion of SBD Guides within Useful Resources noted with thanks.</p>	Noted	No change

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
<b>Norfolk Wildlife Trust</b>	<p>Whilst it is stated that the SPD will be a 'material consideration' in decision making, it is important that the ambitions set out in masterplans, development briefs and outline applications are not watered down at reserved matters stage.</p> <p>Recommend that the list of bullet points is changed with point 9 relating to water issues and point 10 relating to energy.</p>	<p>The main purpose of the SPD is to ensure that decision makers have the relevant information to determine the application and that the applicant is providing a policy compliant scheme. Conditions attached to planning applications will ensure compliance.</p> <p>The ten issues are taken from policy 2. It would be confusing and inappropriate to reorder.</p>	No change
<b>Norfolk Wildlife Trust</b>	<p><b>2. New Technologies</b> The list of policy requirement should include ground and air source heat pumps, electric base heating systems and Photovoltaics (PVs). Reference should be made to the Future Homes standard.</p> <p><b>3. Green Infrastructure</b> Green roofs should be included (<a href="#">Gro Green Roof Code</a> provides useful guidance). A 20% biodiversity net gain is recommended. Natural England's biodiversity net gain study found that a biodiversity net gain scenario of up to 20% was not expected to affect the financial viability of housing developments. Careful design and early consideration can see the achievement of significant biodiversity improvement with little or even no additional spend.</p>	<p>2. This would be introducing new policy/ higher standards than currently in policy.</p> <p>3. Green roofs are already mentioned. Green Infrastructure network is covered by other GI related SPDs. Increasing BNG would be setting a new policy.</p> <p>4. It wouldn't be appropriate to make this mandatory.</p> <p>5. This goes into too much detail and risks introducing new policy. Agree link should</p>	Include link to <a href="#">Resilience Roadmap   UKGBC</a>

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	<p><b>4. Efficient Use of land/Densities</b>            In previously developed sites the reuse of buildings must be considered to reduce embodied carbon. The Carbon Neutral Cities Alliance sets out guidance and examples of <a href="#">Refurbishment vs Demolition and New Build</a>.</p> <p><b>5. Design</b>            Recommend that the text relating to the Sustainability Statement is strengthened by changing “<i>have regard to</i>” to make the requirements listed beneath this mandatory. In terms of demonstrating climate resilience, information should be provided on the following –</p> <ul style="list-style-type: none"> <li>- Withstanding extreme weather</li> <li>- Adapting to temperature changes</li> <li>- Maintaining essential functions</li> <li>- Reducing environmental impact</li> <li>- Enhancing occupant health and safety</li> <li>- Integrating nature.</li> </ul> <p>Recommend including the <a href="#">UK Climate Resilience Roadmap</a>.</p> <p><b>7. Environmental Protection</b>            Biodiversity loss and light pollution should be included in the list of items for which unacceptable risk must be avoided.</p> <p><b>9. Water efficiency</b>            Recommend a more ambitious standard is set and that residential developments should be designed to achieve a standard of 80 litres/person/day unless demonstrated</p>	<p>be provided to resilience roadmap.</p> <p>7. This would be setting new policy.</p> <p>9. This would be introducing new policy/ higher standards than currently in policy.</p> <p>10. This would be introducing new policy/ higher standards than currently in policy.</p>	

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	<p>impracticable. Non-residential development should be required to achieve full credits for category Wat 01 of BREEAM unless demonstrated impracticable.</p> <p><b>10. Water Quality and Energy</b>  Recommend including guidance to <a href="#">Water Supply</a>, <a href="#">Wastewater and Water Quality</a>.  Key issue 2 should refer solely to energy issues. The policy requirements state that the new developments should have “a low level of energy consumption...”. We recommend that specific targets for both</p>		
<b>Norfolk Wildlife Trust</b>	<p>The new Climate Change Committee report about local authorities and adaptation lists mechanisms to empower LAs with their right to adaptation thinking <a href="http://www.ukclimaterisk.org/wp-content/uploads/2025/07/Duties-and-Powers-of-Local-Authorities-for-Climate-Change-Adaptation.pdf">www.ukclimaterisk.org/wp-content/uploads/2025/07/Duties-and-Powers-of-Local-Authorities-for-Climate-Change-Adaptation.pdf</a> .</p>	<p><a href="#">Duties and Powers for Local Authorities in the UK to Adapt to Climate Change</a> focuses on the LPA not on developers so would not be a particularly useful tool in this instance. Any role for such an approach can be considered through the GNLPA Review.</p>	No change
<b>Norwich Climate Commission</b>	<p>Norwich Climate Commission welcomes the introduction of the SPD. It would be helpful to set out in the document how the SPD will be used by planners to control the way planning permissions are implemented, and to set out what control, mechanisms and monitoring the LPA will use to ensure that the SPD has “teeth”.</p>	<p>The main purpose of the SPD is to ensure that decision makers have the relevant information to determine the application and that the applicant is providing a policy compliant scheme. Conditions attached to</p>	No change

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	It would be helpful if the newly published Climate Change Committee report <a href="#">Duties and Powers for Local Authorities in the UK to Adapt to Climate Change</a> were mentioned.	planning applications will ensure compliance.  <a href="#">Duties and Powers for Local Authorities in the UK to Adapt to Climate Change</a> focuses on the LPA not on developers so would not be a particularly useful tool in this instance. Any role for such an approach can be considered through the GNLP Review.	
<b>Norwich Climate Commission</b>	The Commission suggests that the last two points – water efficiency and water quality and energy and reorganised. Water quality and energy are different issues and energy consumption is of sufficient importance to merit its own bullet point. It is noted that in the GNLP itself points 9 and 10 are presented as individual points in Table 8 in any case.	The ten issues are taken from policy 2. It would be confusing and inappropriate to reorder.	No change.
<b>Norwich Climate Commission</b>	<b>3.7 Health Impact Assessments</b> – Whilst it is important that HIAs assess what additional health care provision is required, an HIA should be a tool to identify and optimise the health and wellbeing impacts of planning more generally. <a href="#">Health Impact Assessment in spatial planning: a guide for local authority public health and planning teams</a> provides a useful guide.	The policy requires HIAs to focus on the provision of healthcare infrastructure and service capacity. Other aspects proposed to be covered by HIA in the link are covered by the policy content and its Sustainability Statement requirement, thus do not need to be repeated in HIA.	No change.

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
<p><b>Norwich Climate Commission</b></p>	<p><b>1. Access to services and facilities</b>  <a href="#">Healthy Streets</a> should be included.</p> <p><b>2. New Technologies</b>  Policy requirements should include provision of ground and air source heat pumps, electric base heating systems and the installation of Photovoltaics (PVs) on new build as standard. Reference should be made to <a href="#">emerging Future Homes Standard</a> and <a href="#">Net zero carbon buildings – design, delivery and cost explored</a>.</p> <p><b>3. Green Infrastructure</b>  Green and grey roofs should be mentioned (<a href="#">Gro Green Roof Code</a> provides useful guidance) and more should be made of opportunities to expand existing GI networks. Financial contributions towards the costs should be at policy requirement. A 20% biodiversity net gain is recommended.</p> <p><b>4. Efficient use of land/densities</b>  On previously developed sites the reuse of buildings must be considered to reduce embodied carbon. This section should refer to the circular economy.</p> <p><b>5. Design</b>  Design and Access Statement should be replaced by Sustainability Statement to reduce repetition. It is set out that Sustainability Statement should have regard to “ensuring climate resilience” but no clarity is provided as to what this means. A guidance note should be included and refer to resources such as <a href="#">UK Climate Resilience Roadmap</a>.</p>	<ol style="list-style-type: none"> <li>1. Agree</li> <li>2. This would be introducing new policy/ higher standards than currently in policy 2.</li> <li>3. Green roofs are already mentioned. Green Infrastructure network is covered by other GI related SPDs. Increasing BNG would be setting new policy.</li> <li>4. This would be setting new policy.</li> <li>5. Design and Access Statements are a national requirement and the Sustainability Statement is a requirement of policy 2. In order to avoid repetition agree that cross referencing/ signposting is appropriate. Agree link should be provided to resilience roadmap.</li> <li>7. This would be setting new policy.</li> <li>9. This would be introducing new policy/ higher standards than currently in policy 2.</li> </ol>	<p>Add <a href="#">Healthy Streets   Making streets healthy places for everyone</a></p> <p>Add new sentence to paragraph 3.4 ‘Rather than repeating information from other supporting documents, it may be appropriate to cross reference and signpost to where the relevant information can be found, by providing the document title and the relevant sections/paragraph numbers.’</p> <p>Include link to <a href="#">Resilience Roadmap   UKGBC</a></p>

	<b>Comment</b>	<b>NCC/BDC/SNC response</b>	<b>Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)</b>
	<p><b>7. Environmental Protection</b> Biodiversity loss and light pollution should be included in the list of items for which unacceptable risk must be avoided.</p> <p><b>9. Water efficiency</b> Recommend a more ambitious standard is set and that residential developments should be designed to achieve a standard of 80 litres/person/day unless demonstrated impracticable. Non-residential development should be required to achieve full credits for category Wat 01 of BREEAM unless demonstrated impracticable.</p> <p><b>10. Water quality and energy</b> The policy requirements state that the new developments should have “a low level of energy consumption...”. The needs quantifying both in operational and construction terms.</p>	10. This would be introducing new policy/ higher standards than currently in policy.	
<b>CAMRA (Campaign for Real Ale)</b>	<p><b>1. Access to services and facilities</b> New large-scale housing developments should include at least one pub and one shop. The draft only vaguely mentions access to services without specifying what they are or setting minimum standards.</p>	Issue 1 addresses provision and access to services and facilities. It is not the intention of the SPD to sets out which services should be provided and how many. This would vary depending upon scale and proximity to existing services.	No change
<b>Redenhall with</b>	No comments on SPD but suggest that it would be beneficial for Town Councils to receive early, confidential notification	Noted. The LPA cannot consult on pre apps however	No change.

	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
<b>Harleston Town Council</b>	from LPA on proposed major developments particularly where pre-application advice has been provided.	we would encourage the applicants to do this.	
<b>Nigel Hargreaves</b>	Greater focus and funding should be directed toward creating cycle and walking routes along identified green corridors. This would enhance connectivity between rural communities and Norwich through safe, nature-friendly infrastructure. Developers should be required, to contribute financially to these accessibility improvements.	This issue will be covered under a future Policy 3 SPD/guidance note.	No change
<b>Simeon Jackson</b>	<p><b>4. Efficient use of land/densities</b></p> <ul style="list-style-type: none"> <li>Split the first bullet in "Information required" into two: <ol style="list-style-type: none"> <li>Desirability of higher densities near district centres/public transport.</li> <li>Improving site efficiency by reducing/eliminating car space.</li> </ol> </li> <li>Rephrase unclear sentence to: <i>"In Norwich, the statement should include an assessment of the suitability of the site for low or car-free housing."</i></li> <li>Add reference to Norwich DM policy DM32: Encouraging Car Free and Low Car Housing.</li> <li>Clarify developer expectations by specifying info needed for compliance "The assessment should include information such as whether a low or car-free development on the site would result in a higher density of development, and whether it would be able to provide better facilities for cyclists and disabled people who are unable to drive."</li> </ul> <p><b>5. Design</b></p>	<ol style="list-style-type: none"> <li>The first bullet point relates to Norwich. The second relates to Broadland and South Norfolk.</li> <li>Agree to rephrase for clarity.</li> <li>Agree add DM32</li> <li>Include additional information about density. Cycling not to be included as separate issue.</li> <li>Agree delete DM31</li> <li>Agree</li> </ol>	<ol style="list-style-type: none"> <li>No change</li> <li>Change to "In Norwich, the statement should include an assessment of the suitability of the site for low or car-free housing."</li> <li>Add DM32</li> <li>Add "Which may allow the sites to be developed at higher density".</li> <li>Delete DM31</li> <li>Add: "Accessible focus points and multi-use spaces/meeting places are provided to foster community cohesion."</li> </ol>

	<b>Comment</b>	<b>NCC/BDC/SNC response</b>	<b>Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)</b>
	Remove DM31; other policies like DM3 are more relevant.  <b>6. Inclusive and safe communities</b> Add further bullet to address inclusivity and resilience.		
<b>David Barton</b>	Submission of a 'universal consultation' response to all UK planning consultations. Community Campaigner David Barton is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture/ Traditional Architecture as a key feature across UK LPAs. David Barton is particularly concerned with Design Codes and SPDs relating to this across both designated and non-designated heritage assets.	The response is not specific to this consultation. It mainly relates to detail that would be contained within Design codes or conservation area appraisals. The provision of detailed design guidance and advice is not the purpose of this SPD and therefore is not considered relevant in this instance.	No change