

Greater Norwich Local Plan 2025–2045 Environment Topic Paper

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1. Summary and local context

- Greater Norwich encompasses a diverse range of places, from dense urban centres to rural villages, incorporating an extensive mix of historic assets and contemporary, innovative development. The area also includes protected natural landscapes, productive agricultural land, and well-used urban parks. This diversity in both the built and natural environment is a defining characteristic of Greater Norwich and is central to its distinctiveness and sense of place.
- Planning policy relating to the built and natural environment sits within an already extensive and complex regulatory landscape. This includes national legislation such as the Environment Act 2021 and associated statutory instruments, retained EU regulations including the Habitat Regulations, building regulations, and national guidance such as the National Model Design Code. The emerging Environmental Delivery Plans and Nature Restoration Fund also add an additional layer of complexity to nutrient neutrality considerations in Greater Norwich. Together, these overlapping frameworks create a detailed and multifaceted context within which local planning policy must operate.
- The policy landscape in relation to the natural environment is continually changing with new requirements emerging all the time. This includes new requirements for biodiversity net gain (BNG) for national strategic infrastructure projects (NSIPs) coming into force and new BNG exemptions for minor development types. The draft NPPF 2025 includes reforms “that are designed to...simplify and improve the approach to climate change, environmental protections and heritage assets”¹. The Levelling Up and Regeneration Act 2023 also introduced Environmental Outcome Reports which will eventually replace Strategic Environmental Assessment (SEA) for plans once implemented. It is essential that the local plan process remains alive to this changing policy context and responds as appropriate. The draft NPPF introduces new national policies for plan-making and decision-taking and emphasises the importance of avoiding unnecessary repetition or conflict with these provisions. Consequently, careful consideration will be required to determine which local policy matters remain appropriate to include within the scope of the new Local Plan.

¹ [National Planning Policy Framework: proposed reforms and other changes to the planning system - GOV.UK](#)

- This topic paper covers elements of the built and natural environment relevant to planning policy and legislation. The following have been identified as key areas for consideration for the GNLP 2045:
 - Identifying local natural assets/characteristics for enhancement or protection
 - Identifying sites for green infrastructure and nature recovery
 - Whether locally specific standards e.g. tighter water efficiency standards or higher BNG percentages are required
 - How to achieve higher housing targets and densities in the context of Greater Norwich's distinct historic and natural environment
 - Identifying areas where new or updated evidence is required.

2. Coverage in current Policy, the draft NPPF and Implications for the GNLP 2045

Current policy

The adopted local plan for Greater Norwich is comprised of a suite of policy documents. Primary among these is the current Greater Norwich Local Plan (GNLP), alongside the Development Management (DM) policies for each district, Area-specific Action Plans (AAPs) and several Supplementary Planning Documents (SPDs). A full list of policies relevant to the environment, guidance documents and other evidence is set out in Table 3 of the Appendices.

These existing policies have been assessed against the draft 2025 National Planning Policy Framework (NPPF), with full conclusions available in Table 4 in the Appendices. This summary assessment has been set out in thematic sections. Broadly, the draft NPPF seeks to reserve authority over a greater range of policies than previously, meaning that many provisions in the local plan have been superseded or outweighed.

The implications of the 2025 NPPF consultation draft for GNLP Policy 3 are mixed. Several matters currently addressed in Policy 3 will no longer need to be included in the new Local Plan, as they are now sufficiently covered by national policy. However, a substantial range of built and natural environment considerations will still require detailed assessment and consideration when developing the scope of the new Local Plan policies.

Broadland District Council's Development Management Policies tend to have a light touch when it comes to prescription, allowing for interpretation by officers. Policy GC4 concerns design and is largely covered by the draft NPPF; however, there is a provision for innovative design which has been extensively tested and is worth discussing further with Development Management teams. Policy GC5 relates to renewable energy and EN2 to landscape, both of which require review considering recent developments relating to solar energy projects. Policy EN1 for biodiversity and EN3 for Green Infrastructure have been superseded by the introduction of Biodiversity Net Gain (BNG) and the Recreational Avoidance and Mitigation Strategy (RAMS), while EN4 (pollution), CSU4 (waste) and CSU5 (surface water) add little to the NPPF.

Norwich City Council Development Management policies align well with the NPPF's core principles on sustainable development, good design, climate action,

amenity, flood risk, biodiversity, and heritage protection. In several areas—such as biodiversity net gain advice, green infrastructure, trees and open space protection, flood risk management, and heritage conservation—the Norwich policies go beyond the national framework by setting higher standards and requirements based on local evidence. While these differences largely reflect local circumstances and ambition, their continued inclusion in a new local plan will require clear justification to ensure flexibility and consistency with the NPPF, particularly in dense urban areas like Norwich city centre.

South Norfolk Council's Development Management Policies are divided into thematic sections, with DM4.1-10 covering the environment. DM1.4 is a broad policy relating to environmental quality and local distinctiveness, which is largely covered by the design policies in the draft NPPF. Other policies cover similar matters to those already discussed: renewable energy, landscape, biodiversity, water management, waste and heritage assets. A key consideration will be whether to include local landscape protections such as strategic gaps in the scope of the new Local Plan.

Each of the Area Action Plans (AAP) has a policy relating to general Green Infrastructure requirements, for which provision may be made as per the DM policies for GI in each district. Wymondham AAP has three further policies stipulating GI improvements required for new development to the north, south and west of the town respectively. These priorities have been superseded and may be addressed through RAMS requirements.

All three local planning authorities have existing Supplementary Planning Documents (SPDs) covering topics such as open space, tree protection, landscape character and heritage interpretation. These SPDs include further details to aid implementation of the adopted policies. These details go above and beyond the information contained within the draft NPPF, therefore the new local plan will need to consider the extent to which this information is included going forwards.

Thematic analysis

Climate change

The draft NPPF 2025 strengthens national policy on climate change within Chapter 5 “Meeting the challenge of climate change”, with cross-references to energy and infrastructure (Chapter 10), introducing a clearer expectation for measurable net zero alignment, integrated mitigation and adaptation, and the use of nature-based solutions.

The GNLP already embeds climate change as a strategic priority (Section 4 and Policy 2) but its approach is largely principle-based and does not currently require measurable carbon reduction or resilience outcomes. Similarly, existing DM policies across the three authorities focus on energy efficiency and sustainable construction through criteria-based approaches but do not include measurable standards. The implication of the draft NPPF is that consideration will need to be given to incorporating strengthened local policies with clearer, quantifiable standards and earlier integration of climate requirements into plan making and development proposals.

Water efficiency

Water efficiency is more explicitly addressed in the draft NPPF through Chapter 10 “Securing clean energy and water”, with stronger expectations around water resource management, efficiency and infrastructure alignment. This is more explicit than current national policy and elevates water efficiency as a key development consideration. National policy allows for local policy to set local water efficiency standards where there is sufficient justification.

In the GNLP, water efficiency is addressed by setting the most demanding water efficiency standards permitted at the time due to the water stressed status of our region. DM policies typically focus on drainage and water management rather than consumption standards. The implication is that up-to-date evidence will be needed to justify the inclusion of more demanding water efficiency standards in local policy.

Flood risk

A key structural change in the draft NPPF is the separation of flood risk into a distinct policy chapter, alongside clearer guidance on the application of the sequential and exception tests and stronger emphasis on site selection and evidence requirements. This elevates flood risk as a primary spatial constraint and introduces a more rules-based framework.

The GNLP addresses flood risk within broader environmental and infrastructure policies, while DM policies provide more detailed development management criteria (e.g. site-specific flood risk assessments and SuDS). While existing DM policies are broadly aligned in intent, consideration will need to be given to new local policy to reflect the more structured and front-loaded national requirements.

Nature recovery

The draft NPPF reinforces nature recovery through Chapter 17 “Conserving and enhancing the natural environment”, with stronger emphasis on biodiversity net gain, habitat restoration and alignment with Local Nature Recovery Strategies. This reflects the evolving statutory framework introduced by the Environment Act 2021.

The GNLP (Policy 3) supports environmental enhancement, through high-level policies and includes requirements for development to address issues such as recreational impact on protected sites and nutrient pollution of waterways. DM policies similarly prioritise protection and mitigation of biodiversity impacts. The scope of the new local plan will need to consider if there is a need for greater emphasis on proactive, strategic nature recovery, measurable gains, and integration with national and county-level ecological strategies.

Green and Blue Infrastructure

The draft NPPF embeds green and blue infrastructure (GI) across multiple policy areas (notably climate, design and natural environment chapters), promoting multifunctional infrastructure that supports resilience, biodiversity and health outcomes. It states that plans should set local standards for the provision of different types of outdoor spaces including for play, sport, informal recreation and allotments

In Greater Norwich, GI is already well embedded within the GNLP (Policy 2) and supported by a Green Infrastructure Strategy SPD, with DM policies reinforcing site-level provision. While local policy is comparatively advanced, the draft NPPF may still require clearer linkage between GI delivery, climate outcomes and measurable standards within the new local plan.

Design and Heritage

The draft NPPF maintains a strong focus on design and heritage through Chapter 14 “Achieving well-designed places” and Chapter 16 “Conserving and enhancing the historic environment”, while placing greater emphasis on design coding, masterplanning and early-stage quality assurance as opposed to highly detailed local plan policies.

The GNLP and DM policies already contain robust criteria for design quality and heritage protection, particularly at the development management level. However, these policies tend to be reactive and criteria-based frameworks. The implication is that Greater Norwich authorities may need to strengthen policy around design coding, spatial frameworks and proactive design governance to align with the draft NPPF’s more structured and front-loaded approach to securing high-quality outcomes.

Landscape character

Landscape character is addressed in the draft NPPF within Chapter 17, with an increased focus on integrating landscape protection with wider objectives for biodiversity, climate adaptation and green infrastructure.

The GNLP and DM policies provide strong protection for landscape character and locally valued landscapes, primarily through criteria-based assessments. However, these policies are focused on avoiding and mitigating harm rather than delivering multifunctional environmental outcomes. The policies may need to move beyond protection toward enhancement and integration with nature recovery and climate objectives, consistent with the broader direction of national policy.

Trees and Hedgerows

The draft NPPF strengthens expectations for the retention and enhancement of trees and hedgerows within Chapter 17, highlighting their role in biodiversity, climate mitigation and placemaking.

In the GNLP and DM policies, trees and hedgerows are generally protected through design and environmental criteria, with an emphasis on retention and mitigation. The draft NPPF introduces a more proactive approach, encouraging expansion and integration of green networks, indicating that local policy may need to shift towards a more positive outcomes-focused approach.

3. Early policy direction of thoughts

Table 1: Early policy direction of thoughts

Policy theme	Initial direction of travel (post-2025)
Climate mitigation/adaptation	• Should we consider local policy measures to encourage using sustainable materials, reducing embodied carbon, siting and aspect of development for solar gain, using landscaping for shade and cooling? What might these mechanisms be? • Should we consider using the growth strategy and hierarchy of settlements as a mechanism to deliver sustainable development? How could we do this?
Water efficiency	• Should we consider higher local water efficiency standards due to local water scarcity issues? What could this look like and how could we secure this? • Should we consider local guidance/requirements for additional measures such as “flow slowing” measures or rainwater harvesting to address local issues and how would we do this?
Flood risk	• Is there a need to have local sustainable drainage standards in the local plan? What standards could be included? • What is the best way to include reference to local flood risk documents in the local plan (eg. Critical drainage areas) and what this means for development?

BNG/nature recovery	• Should we investigate the local need for a higher BNG % above the 10% statutory minimum? This requires evidence that there is a local need and that it would not affect development viability • Should we consider allocating sites for nature recovery/BNG use? • Should we include specific nature recovery requirements in site allocation policies? • Is there a need to review national and local designated spaces to bring these up to date? • Should we consider the possibility of new/additional standards such as Urban Greening Factor? Are there any other standards we should consider? • Is there a need for a local mitigation hierarchy for locally identified natural assets? • What is the best way to reference local evidence documents e.g. GI Strategy or biodiversity studies in the local plan? • Could we include ecology assessments in local validation lists without a policy requirement?
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Green & Blue Infrastructure/GIRAMS	• The RAMS tariff will still need to be collected but impact on protected sites and Zones of Influence, plus tariff amounts, will need to be considered in light of the additional growth the plan will accommodate • The new Greater Norwich Green Infrastructure Strategy evidence base should be referred to which could influence growth locations. Should we consider setting out specific GI requirements in site allocation policies and how detailed should this be? • Should we consider the possibility of setting local GI and other open space standards that are different to Natural England standards – particularly in urban areas where alternative criteria may be needed to ensure deliverability – including spaces for different uses (SANGS/formal/sport/allotments etc) or how commuted sums would be calculated instead of direct provision? How might we go about this? • Should we consider allocating/identifying sites for SANGS to meet Natural England requirements? • Should the local plan identify green/open spaces locally to be protected and criteria for accepting their loss? • What role could the River Wensum Strategy have in a future local plan?
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Design and Heritage	• Should the local plan include heritage interpretation requirements and where would these best be included? E.g. Local policy, design guides/codes, conservation area appraisals. How does this interact with the Historic Environment Record (HES)? • How do we go about drawing up a local list of non-designated heritage assets? • Should we consider an urban intensification and protected views policy for Norwich city centre to explore locations where densities could be increased in a sensitive way? Likely needs to include assessment of key/protected views. • Possibility to commission additional design codes/guides for key areas e.g. large urban extensions/new settlements/strategic regeneration areas etc • Are there key conservation area appraisals to update to ensure local design is taken into account alongside NPPF policies? • How else might we consider specific amenity impacts (e.g. privacy) or local standards (e.g. internal space standards) not referenced in the NPPF? • Should we still be including detailed guidance such as how archaeological finds should be displayed and heritage interpretation etc? • Should provision be made for innovative and low-carbon design and how would this best be included? • Should we still request Heritage Interpretation Statements and what would the mechanism be for this?
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Landscape character/strategic gaps	• What is the desire/need for retaining existing or designating new strategic gaps? This would need an evaluation of current landscape character and would influence the growth strategy. • How could we consider sensitive viewpoints in the new local plan? • Can we include landscape assessments on validation lists without a local policy requirement? • Could/should the newly adopted South Norfolk Landscape Susceptibility SPD be referenced through an area-specific policy for South Norfolk? • How can we consider the “urban landscapes” in the new local plan? • Is there scope for including/referring to technical standards or thresholds and financial contributions for open and play space?
Trees and hedgerows	• Is there an appetite for protecting locally significant trees and hedgerows? If so, what criteria should be used for identifying these assets? • Is there scope for including/referring to technical standards for tree protection and planting? How could we do this?

4. Evidence – what we have and what we need

Table 2: Existing evidence/strategies

Evidence	Status	Lead/commissioner	What it informs
Landscape Character Assessment Supplementary Planning Document (SPD) Broadland and South Norfolk	Broadland: adopted 2013	Broadland: Chris Blandford Associates	Strategic gaps Growth and infrastructure locations Application of local design guidance using NPPF policy
South Norfolk landscape character assessments Broadland and South Norfolk	South Norfolk: adopted 2001, reviewed 2012	South Norfolk: Land Use Consultants /Chris Blandford Associates (review)	
Open Space Needs Assessment	Uncommenced	All Greater Norwich authorities	Local standards for all types of open space
Urban intensification/ protected views in the city assessment	Some existing in CA appraisals Additional evidence required	All Greater Norwich authorities	Allows application of local design guidance using NPPF policy
Updated conservation area appraisals or design guides/codes	Some underway	All Greater Norwich authorities	Allows application of local design guidance using NPPF policy
Update to GIRAMS study	Uncommenced	Will need to consider new housing beyond GNLP 2038	Tariff to be collected from development

Viability study	Uncommenced	All Greater Norwich authorities	To investigate the potential for higher than 10% BNG, higher water efficiency standards and impact of any other local standards (GI etc)
Strategic Environmental Assessment	Uncommenced	All Greater Norwich authorities	Whole plan
Habitat Regulations Assessment	Uncommenced	All Greater Norwich authorities	Whole plan

5. Spatial strategy linkages and cross-boundary issues

- The Conservation of Species and Habitats Regulations 2017 require the local planning authorities within the catchments of protected sites (River Wensum SAC, Broads SPA and Ramsar Site) to ensure that development does not result in additional nutrient pollution to these areas before planning permission can be granted. If a development site is affected, developers need to show whether and how much nutrient pollution the development would cause, identify appropriate mitigation measures and submit a Habitat Regulations Assessment (HRA) to explain the above. In Greater Norwich, mitigation measures have been provided by developers on some, usually large, individual sites. However, in cases where this has not been possible, developers are able to purchase credits from providers offering strategic mitigation solutions within the catchment. As this is a separate regulatory requirement, nutrient neutrality constraints will remain a key consideration for the GNLP 2045.
- The Conservation of Species and Habitats Regulations 2017 also require that new development does not result in increased visitor pressure to protected sites. The current GNLP addresses this two-fold:
 - GI – The provision of new or improvement of existing GI to provide alternative spaces for visitors instead of the protected sites (also known as Suitable Alternative Natural Greenspaces SANGs)
 - RAMS – The payment of a tariff per new dwelling to be used towards measures to reduce visitor impacts at the protected sites

As this is a separate regulatory requirement, GIRAMS will remain a key consideration for the GNLP 2045.

- The Norfolk and Suffolk Local Nature Recovery Strategy has been prepared to guide nature restoration in the region. The Strategy sets out a description of the area, identifies locations that are of existing biodiversity value, areas where there are opportunities to restore and enhance habitats and practical actions to support priority habitats and species. The Environment Act 2021 introduced the new biodiversity duty which requires public authorities to have regard to relevant LNRS when making local

plans and decisions. This will therefore be a key consideration for the GNLP 2045 in terms of location of development and whether nature recovery requirements could be identified for site allocations.

- There are several strategic water issues that the GNLP 2045 will need to consider. The East of England is severely water stressed and there are limits on the capacity of the water infrastructure to provide water and deal with wastewater from existing development cumulative with future growth. The local plan will need to consider growth plans in consultation with water infrastructure providers to ensure that delivery of the homes and employment needed in Greater Norwich is not constrained by infrastructure capacity.
- The Greater Norwich area crosses with the boundary of the Broads National Park. The Broads Authority are the local planning authority for this Executive Area and have their own local plan for deciding planning applications within this geography. Nevertheless, the GNLP 2045 will need to consider the landscape context of the Broads particularly in relation to the location of growth and be cognisant of the additional protection that national policy affords this area.
- In addition to the matters outlined above, further changes to the national environmental policy framework are expected to come into force during the period in which the GNLP 2045 is prepared. These include Environmental Delivery Plans, which will set out strategic nature recovery solutions to address availability and deliverability issues for nutrient neutrality and biodiversity net gain, and Environmental Outcomes Reports, which are intended to replace the current Strategic Environmental Assessment and Environmental Impact Assessment regimes. While these reforms have not yet been implemented, the local plan preparation process will need to monitor their progress and remain sufficiently flexible to respond as necessary.

Appendices

Table 3: List of relevant policies, guidance documents and other evidence

Source	Related policies
GNLP link(s)	Policy 2: Sustainable Communities Policy 3: Environmental Protection and Enhancement Policy 7.1: The Norwich Urban Area including the fringe parishes Implementation of the GN GI Strategy SPD Sustainable Communities SPD
Related DM policies	Broadland District Council DM Policies: GC4, GC5, EN1, EN2, EN3, EN4, CSY4, CSU5 Norwich City Council DM Policies DM1, DM3, DM4, DM5, DM6, DM7, DM8, DM9 Norwich City Council Local Development Framework South Norfolk Council DM Policies DM1.4, DM4.1 through to DM4.10 South Norfolk Development Management DPD
AAP policies	Broadland District Council AAPs Growth Triangle Area Action Plan : GT2 South Norfolk Council AAPs Long Stratton Area Action Plan : LNGS5 Wymondham Area Action Plan : WYM8 through to WYM11
SPDs/guidance notes	Norwich City Council SPD Heritage Interpretation: https://www.norwich.gov.uk/downloads/file/2489/adopted_heritage_interpretation_spd Landscape and Trees https://www.norwich.gov.uk/downloads/file/2291/landscape_and_trees_spd Open Space and Play https://www.norwich.gov.uk/planning/planning-policy/spds-guidance-notes-and-supporting-documents/adopted-supplementary-planning-documents-spds/open-space-and-play-spd-adopted-october-2015

	Biodiversity Net Gain Planning Guidance Note https://www.norwich.gov.uk/sites/default/files/2026-01/biodiversity_net_gain_planning_guidance_note_2024.pdf River Wensum Strategy https://www.norwich.gov.uk/planning/planning-policy/river-wensum-strategy-documents GNLP Policy 2: Sustainable Communities Supplementary Planning Document (SPD) Broadland and South Norfolk Greater Norwich Green Infrastructure Strategy Supplementary Planning Document (SPD) Broadland and South Norfolk South Norfolk and Broadland Design Code Supplementary Planning Document (SPD) Broadland and South Norfolk Landscape Character Assessment Supplementary Planning Document (SPD) Broadland and South Norfolk Open Space SPD Broadland and South Norfolk South Norfolk Place-Making Guide SPD Broadland and South Norfolk South Norfolk landscape character assessments Broadland and South Norfolk Landscape Susceptibility in relation to Energy Generation, Storage and Transmission Supplementary Planning Document Advice notes: Waste and Recycling. Broadland Design Guide, SN Place Shaping Guide.
Other evidence documents	Norwich Biodiversity Baseline Study 20024 Biodiversity Net Gain Planning Guidance Note 2024 Greater Norwich Green Infrastructure Strategy 2025 View all Strategy Documents - Greater Norwich Growth Board Norfolk Local Nature Recovery Strategy 2025 https://www.norfolk.gov.uk/media/44225/Norfolks-Local-Nature-Recovery-

	<u>Strategy/pdf/ciNorfolk_Local_Nature_Recovery_Strategy.pdf?m=1761837864220</u> <u>Conservation areas Broadland and South Norfolk</u>
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Table 4: Analysis of existing policies against draft 2025 NPPF

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
GNLP Policy 3	BUILT • Avoiding harm to designated and non-designated heritage assets • Creating distinctive places • Provide continued/new uses for heritage assets • Submit Heritage Impact Assessments in impacts may arise NATURAL • Respect, conserve, enhance natural assets considering local guidance • Avoid, mitigate, compensate hierarchy (for biodiversity only) • Provide new or enhance existing GI considering local evidence • Mandatory 10% BNG • Requirement to provide SANGs to mitigate visitor pressure at protected sites	BUILT • Any local heritage policies we do keep will need to be more location specific • Inclusion of requirement for heritage interpretation • How the new plan will make reference to new evidence bases where we do not have local policies NATURAL • "Avoiding harm" non-designated assets • Avoid, mitigate, compensate hierarchy for natural assets in general • Requirement to undertake ecology/landscape assessments if impacts may arise • Potential to consider higher local BNG % • Local standards for GI provision (otherwise national standards apply) • Requirement to submit HRA • Nutrient Neutrality

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
GNLP Policy 7.1 (built & natural environment)	Broad statements covered under policy 3 assessment	- Settlement hierarchy and hierarchy of centres still needs to be set out (see the dedicated topic paper on this and questions on the overall growth strategy) - Programme of public realm infrastructure improvements still needs to be set locally - Local design codes/guides/masterplans/evidence documents still need to be referred to where they provide local policy detail
GNLP Policy 2 SPD	Most issues covered by Policy 2 are covered by the draft 2025 NPPF.	Policy 2 will be radically revised/deleted as part of writing GNLP 2045, therefore the contents of the SPD will become redundant.
GNLP GI Strategy SPD	- Strong emphasis on high quality multi-functional green and blue infrastructure - Aiming for consistent and evidence-led decision making - NPPF refers to the need to use local strategies as evidence in decision making - Support for wider climate and environmental benefits	- The SPD detailed local mapping and prioritisation go beyond what the NPPF contains - Local evidence for GI still needs to be referred to for implementation of the NPPF policies. - SPD contains more specific operational/delivery focused content going beyond the NPPF principles (e.g. worked examples, direction to resources)

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
BDC GC4	• Responding to local character. • Residential amenity. • Efficient use of land. • Sustainable locations for development. • Responding to climate change.	• Provision for innovative design and low-carbon development, e.g. Passivhaus.
BDC GC5	• Draft NPPF supersedes DM policy in its entirety.	• Stronger focus within the draft NPPF on the importance of renewable energy, including actively planning and identifying sites for it at a local level within the development plan.
BDC EN1	• Protection of environmental assets from harm and requirement for enhancements to existing assets.	• As with Norwich DM6 below.
BCD EN2	• Protection of designated assets such as Conservation Areas and SAMs. • NPPF focuses on optimising density at cost of non-designated character areas.	• Specific policy will be needed to reference the Landscape Character Assessment SPD. • Give regard to value of green gaps, skylines, important views, nocturnal character and other significant green spaces and how these could be included in GNLP 2045.
BDC EN3	• Superseded by GIRAMS & draft NPPF.	• As with Norwich DM6 below.
BDC EN4	• Draft NPPF chapter 17 fully addresses the pollution criteria set out by EN4.	• Not applicable.
BDC CSU4	• NPPF sets out that minerals and waste matters can be addressed in a separate plan or combined with local plans.	• Investigate whether stipulations need to be made in the GNLP beyond those in the local minerals and waste plan.

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
BDC CSU5	• Minimising risk of flooding without increasing risk elsewhere. • Adequate mitigation of surface water flood risk in most vulnerable areas. • Sequential and exception tests.	• CSU5 references the inclusion of specific design features to reduce surface water risk, such as permeable materials and green walls. Consider whether to carry forward specific mitigation measures in GNLP 2045.
Norwich DM1	• Protect and enhance physical and environmental assets • Climate change, carbon reduction, efficient use of resources • Safety, security, health and wellbeing • General sustainable development principles • Presumption in favour of sustainable development	• Local character and distinctiveness of built and natural environment characters

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
Norwich DM2	• Impacts from noise, vibration, air and light pollution • General principles for high standard of amenity, good outlook, light • Landscaping of communal areas	• Explicit reference to privacy and overlooking impacts • Standards/criteria for assessing loss of light or outlook • Standards/criteria for providing adequate light and outlook for new occupiers • New development "must not restrict established uses" principle is not explicit in the NPPF (agent of change principle) • Internal space standards • Standards for private/communal external amenity space • Criteria for exceptionally accepting development without the provision of amenity space (could be a particular issue in urban setting such as Norwich)
Norwich DM4	• Support/promote clean/low carbon energy • Support the need to address climate change • Mitigate adverse impacts on design/amenity/safety • Promote measures to reduce carbon emissions	• Need to protect sensitive viewpoints (heritage assets and landscape) • Cumulative impact criteria

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
Norwich DM5	• Aim to reduce flood risk from all sources • Sequential approach and exception tests • Use of robust evidence for decision making • Pragmatic approach to flood risk mitigation in built up areas	• Local exception criteria such as in city centre regeneration areas - leniency where adverse impacts can be outweighed by city centre social and economic benefits? • The use of local evidence such as critical drainage areas developed with the Lead Local Flood Authority (LLFA) • Mandating the use of SuDS in new development
Norwich DM6	• Seeking to enhance and protect the natural environment (weaker protections in NPPF) • Integrating biodiversity into development design • Tiered approach to identifying designated natural assets • Enhancement and protection of biodiversity • Statutory BNG • The critical role of GI in sustainable development	• Mitigation hierarchy for all natural assets • Local document requirements eg. ecology surveys or landscape character assessments • Possibility for increased local BNG % • Specific identification of local natural assets incl geodiversity sites • Referencing local evidence documents eg biodiversity studies and GI Strategy
Norwich DM7	• Streets should be tree lined - increased requirement in NPPF • Strong justification for the removal of important trees required • Mitigation required where trees are removed (BNG overtakes biomass method in DM7) • Protection of trees during development	• Local criteria where it is exceptionally acceptable to lose trees including what are considered to be important trees or landscape assets • Additional details for tree proposals in TPO/CA areas • Possibility for higher local BNG% • Specific technical on-site information on what would constitute adequate tree protection measures

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
Norwich DM8	• Creation of new open space in major developments • Guarding against the loss of open space • Recognition of the value of different types of open space for different uses (educational/recreational/allotments etc)	• Identification of local open/green spaces to be protected • Specification of local exception criteria permitting the loss of open space • Specific protection for allotments • Quantifying open space requirements for different development sizes or how commuted sums would be calculated • Reference to updated evidence bases eg GI Strategy
Norwich DM9	• Conserve and enhance historic environment and significance • Differing levels of protection for nationally and locally designated assets (NPPF is less stringent and specific in local asset retention and doesn't include viability-based tests) • Assessments required where there are archaeological constraints • Acknowledgement of value of non-designated heritage assets • Strong justification required for loss of or harm to heritage assets	• Local evidence such as conservation area appraisals and how they should be used • Local requirements for heritage interpretation • Local requirements for monitoring, in-situ preservation or removal and display on a site-by-site basis of archaeological finds • Requirement for legally binding agreement to secure viable use for unavoidable loss of designated assets • Design guides/codes or updated CA appraisals as local evidence

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
Norwich Heritage Interpretation SPD	- Heritage is a core component of sustainable development not solely a constraint - No "one size fits all" approach – case-by-case assessments required - Both documents acknowledge the positive role of development in understanding and explaining heritage	- Operational detail included in the SPD including requirements for allocated sites and financial contribution ranges – the NPPF text discourages adding this detail except where justified - SPD requires the submission of Heritage Interpretation Statements, whereas the NPPF requires proportional evidence
Norwich Landscape and Trees SPD	- Landscape and Trees are/should be embedded throughout development and have multi-functional benefits - Expectation that development should work with existing assets where possible (retaining trees etc and conserving and enhancing the environment)	- SPD provides detailed information on design standards, supporting documents, indicative costs and expectations around level of professional input. - SPD sets out expectations for planning applications and validation requirements - The SPD is tailored to Norwich making reference to key landscape features
Norwich Open Space and Play SPD	- Open and play space is fundamental to healthy communities - Development should help meet the need for this infrastructure (either provide or contribute) - Emphasis on well designed, accessible and inclusive - Support for multifunctional spaces and efficient use of land	SPD provides details on local standards, thresholds and typologies and when financial contributions can be sought

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
Norwich BNG Guidance Note	• Commitment to statutory BNG, the mitigation hierarchy and the biodiversity gain hierarchy • Use of robust evidence base to achieve outcomes for biodiversity • Support for multi-functionality	• Guidance note is non-statutory • Guidance note contains locally specific operational details such as validation requirements, process stages, local priorities for biodiversity and expectations for management and combining with other environmental obligations • Alignment with emerging Norfolk LNRS implementation note and changes to statutory BNG
Norwich River Wensum Strategy	• Recognition that blue infrastructure is a strategic asset • Support for multi-functional spaces • Recognition of health and social equity benefits • Both documents acknowledge the positive role of development in enhancing and protection blue infrastructure assets • Strategic/cross-boundary cooperation	• River Wensum Strategy is not planning policy and is non-statutory • Strategy is location and project specific – it is delivery focused looking at funding sources etc • Strategy also applies outside of the development process e.g. externally funded projects
SNC DM1.4	• Reflection of local characteristics. • Protection of designated and environmental assets. • Design-related criteria. • Prioritising re-use of buildings. • Support for renewable energy.	• Water-efficiency. • Waste and recycling. • Non-designated heritage assets.

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
SNC DM4.1	- NPPF supports life-extension and/or repowering of existing renewable energy schemes, as well as improvement of the energy efficiency of existing buildings. - Decommissioning and site restoration. - DM4.1 explicitly protects the amenity of local residents in relation to renewable energy by way of noise, outlook, overbearing effect, pollution and impact on health. NPPF has general provisions on pollution arising from development proposals addressing the same issues.	- Stronger focus within the draft NPPF on the importance of renewable energy, including actively planning and identifying sites for it at a local level within the development plan. - DM4.1 specifically references the impact on designated and non-designated heritage assets, while the NPPF does not. - DM4.1 refers to the character/appearance of the landscape, while the NPPF focuses on pollutive noise and light impacts on tranquil areas and intrinsically dark landscapes. - SN Landscape Susceptibility SPD.
SNC DM4.2	- Integration of appropriate water management tools into the design of development. - Supporting the multifunctional benefits of SUDS for biodiversity and amenity value. - Reducing surface water flooding through the use of SuDS and runoff management.	- DM4.2 provides more specific detail relating to the inclusion of specific design features to reduce surface water risk, a clearer emphasis on water-quality expectations and a requirement for a sewerage capacity assessment for new development. - Local water quality could be a GNLP focus.
SNC DM4.3	NPPF sets out that minerals and waste matters can be addressed in a separate plan or combined with local plans.	Do the current provisions of DM4.3 relating to kerbside collection add value to the adopted minerals and waste plan?
SNC DM4.4	NPPF covers BNG and nature-based solutions which supersede DM4.4.	No reference in the NPPF to Important Local Open Spaces.
SNC DM4.5	Reflecting local landscape character in design of new development.	- Removal of valued landscapes from the NPPF and reduced landscape protections. Locally designated landscapes would need to be reinforced through GNLP policies. - Definition of landscape harm.

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
SNC DM4.6	None	Locally designated landscapes would need to be reinforced through GNLP policies.
SNC DM4.7	Conservation and enhancement of landscape character.	No provision in the NPPF for locally important designations such as defined landscapes or important gaps.
SNC DM4.8	Ancient woodlands and ancient/veteran trees are explicitly protected in the NPPF	NPPF requires conservation/enhancement of established trees and hedgerows where possible. DM4.8 more explicitly promotes the retention of important hedgerows, significant trees/woodlands and orchards.
SNC DM4.9	Importance of landscaping within development proposals.	Does NPPF emphasis on increased density overrides local landscape protections?
SNC DM4.10	- Positive development of heritage assets. - Avoidance of harm to the historic environment. - Conservation Areas and archaeology.	- Draft NPPF requires drawing up a local list of non-designated heritage assets. - DM4.10 refers to the Historic Environment Record (HER), but local distinctiveness is less important in the draft NPPF. Could have policies in the GNLP relating to contribution of heritage assets to local character?
LNGS5	Superseded by GIRAMS & draft NPPF.	As with Norwich DM6 above.
WYM8-11	Superseded by GIRAMS & draft NPPF.	As with Norwich DM6 above.
GT2	Superseded by GIRAMS & draft NPPF.	As with Norwich DM6 above.
Policy 2 SPD	Most issues covered by Policy 2 are covered by the draft 2025 NPPF.	Consider whether the additional statements required by Policy 2 are valuable/justified. Retain and update list of resources if these are considered helpful.

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
GNGIS SPD	Recognizing the critical role of GI in sustainable development.	Local standards for GI provision still need to be set, otherwise national standards will apply. Reference will need to be made to the GNGIS document in GNLP 2045.
Design Code	Design is a key focus of the draft NPPF as it is mentioned throughout as well as having its own dedicated chapter and policies.	The draft NPPF is clear that design and placemaking are quantitative standards that can be set through development plan policies and DP1 advocates the use of design guides and design codes as well as setting out locally specific design policies or standards. PM13 states that the evidence for locally set design standards must be proportionate, but PM4 states that locally specific design policies are one area where supplementary plans may be used. Consideration will need to be given as to the best way to approach locally specific design criteria in GNLP 2045.
BDC LCAs SNC LCAs	The importance of the landscape and the protection of landscape character generally.	Specific policy will be needed to reference the Landscape Character Assessment SPDs. Give regard to value of green gaps, skylines, important views, nocturnal character and other significant green spaces and how these could be included in GNLP.

Policy	Issues that are covered by national policy and don't need further consideration	Issues that are not covered by national policy and need further consideration in the GNLP 2045
Landscape Susceptibility	The importance and protection of landscape character generally and a focus on demonstrating how design has been impacted or influenced by the landscape.	Specific policy will be needed to reference the Landscape Character Assessment SPD, with further consideration required to landscape sensitivity if this is a political priority. Even if current protections are continued, these are more likely to shape rather than prevent development due to the substantial weight granted to energy proposals.
BDC & SNC Place-making guides	Design is a key focus of the draft NPPF as it is mentioned throughout as well as having its own dedicated chapter and policies.	Will be superseded by the South Norfolk and Broadland Design Code SPD.
Waste and recycling	NPPF sets out that minerals and waste matters can be addressed in a separate plan or combined with local plans.	Investigate whether stipulations need to be made in the GNLP beyond those in the local minerals and waste plan.