

Our Ref: Greater Norwich Local Plan Scoping Opinion Consultation
25 September 2026

County Hall,
Martineau Lane,
Norwich,
NR1 2DH

Direct Tel: 0800 389 6819

Web: www.norfolkandsuffolk.icb.nhs.uk

Email: nwicb.contactus@nhs.net

**Greater Norwich Local Plan Scoping Opinion
Consultation Document Aug 2026 –
NHS Norfolk and Suffolk ICB response September 2026**

Dear Sir/Madam,

As a commissioning body, the ICB has a statutory duty to respond to local planning authority consultations and advise on the support required for health services. The ICB aims to work closely with local planning authorities to help us move forward for the benefit of our communities in Norfolk. Please find below the NHS Norfolk and Suffolk ICB's comments on the Greater Norwich Scoping Opinion Consultation Document.

Published on 3 July 2025, the 10-Year Health Plan sets out a shift in direction for improving life expectancy, reducing health inequalities and strengthening prevention. Although no timescale has been confirmed for introducing new models of continuous, accessible and integrated care, work towards this ambition continues.

The new care model will be built around three key shifts across the health service:

- Hospital to community
- Analogue to digital
- Sickness to prevention

A greater emphasis on prevention will ensure that appropriate care is:

- As local as it can
- Digitally enabled
- In a person's home/place of residence where possible
- In a neighbourhood health centre (NHC) when appropriate and identified as part of neighbourhood strategy. The location, scale and timing of any Neighbourhood Health Centre will need to align with locally agreed neighbourhood strategies, population health need, service models and available funding
- Only in hospital if necessary

Future primary care provision is therefore likely to combine digital access, neighbourhood-based services and more effective utilisation of existing estate. This broader, community-focused model will also make greater use of community pharmacies to help manage long-term conditions, supported by access to digital patient records.

Please see below answers to the local plan scoping opinion questions:

Part A - What should the GNLP 2045 include?

A1 Developing the Vision and Objectives

Question 1 – Are there any other key Strengths, Weaknesses, Opportunities or Threats that should be included in the SWOT analysis for Greater Norwich? Why?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Please see list of suggested additions for the 4 sections below...

Strengths:

- The amount of rural landscapes and natural assets provides a good foundation for preventative health, mental well-being and active recreation/travel.

Weaknesses:

- Existing GP practices, dental practices and community hubs face physical space constraints that struggle to absorb rapid housing growth.
- Transport barriers such as poor rural public transport connectivity limits access to central health services for vulnerable, non-driving or low income populations.
- Developer contributions often lag behind growth, if they have been able to be secured for health. The outdated CIL list for greater Norwich restricts healthcare access to CIL funding to complete meaningful projects which would best serve new and existing communities with the level of growth expected.

Opportunities:

- Use updated planning policies to embed health impact assessments and active design principles, including walkable neighbourhoods, cycle networks and active travel corridors, within new site allocations, helping to reduce chronic disease. Also include in policies public transport links.
- potential opportunity to co-locate health services within multi-use public or commercial hubs to improve accessibility and operational efficiency.
- leverage smart planning and digital connectivity to support remote care and home based healthcare technologies, particularly for rural or housebound residents.

Threats:

- An ever aging population increases the prevalence of long term conditions creating unsustainable demand on healthcare infrastructure and services.
- Health inequalities widening due to cost of living and housing pressures.
- Extreme weather and climate health risks. Rising temperatures and flooding have a direct health risk to vulnerable demographics.

Answer

Norfolk and Suffolk ICB Central Locality Team:

You could consider the following:

Strengths:

- Relatively high levels of natural capital and green space, supporting health, wellbeing and biodiversity.
- Strong network of market towns and local communities, helping support community resilience and local identity.
- Existing commitments to active travel and sustainable transport infrastructure, providing a foundation for healthier places.

Weaknesses:

- Ageing population with increasing prevalence of frailty, dementia and multiple long-term conditions; linking to Shortages of affordable and accessible housing, including homes suitable for older people and those with disabilities.
- Car dependency and limited public transport connectivity in some more rural locations, reducing access to employment, education, healthcare and services.

Opportunities:

- Designing healthy neighbourhoods that support independent living, active ageing and prevention.
- Using population health management data to target growth, infrastructure and services where need is greatest.
- Creating age-friendly communities & neighbourhoods, including accessible housing, walkable neighbourhoods and community hubs.
- Integrating health, care, leisure and community infrastructure into new developments from the outset.
- Expanding active travel networks to improve health outcomes and reduce carbon emissions.
- Green infrastructure and nature-based solutions to improve climate resilience, biodiversity and population wellbeing including access to physical activity.

Threats:

- Increasing demand on health and social care services from demographic change.
- Worsening health inequalities if growth is not accompanied by appropriate infrastructure and service investment.
- Workforce shortages affecting the delivery of public services and economic growth.

NCC Public Health Team:

NCC Public Health supports a health in all policies approach to ensure consideration of how growth can reduce health inequalities and improve population health outcomes.

Weaknesses: Health access is not equal across neighbourhoods in Greater Norwich

Question 2 – Is there any other baseline data that we should consider when developing our SWOT and analysis of the key issues facing Greater Norwich?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

- The ICB estates team would recommend the use of Norfolk insights as this has a wealth of information and mapping with a local lens for health demographics.
- The ICB estates demand and capacity information can help to indicate where GP practices may already be constrained or close to being constrained.
- Historically Local Planning Authorities have had access to STRATA (formally SHAPE), this could be a useful source of data especially if healthcare information is available to the LPAs.

Norfolk and Suffolk ICB Central Locality Team:

- Demographics and population change – ageing population and growth projections
- Healthy life expectancy – including IMD, frailty prevalence, dementia prevalence, long-term condition prevalence, physical activity levels, obesity rates, mental health indicators, carer numbers and projected growth
- Housing need – is future housing aligned to future population
- Access to services – GP practices, community health services, pharmacies, schools, public transport, community hubs, green spaces
- Health and care infrastructure – GP capacity and workforce trends, care home capacity, community healthcare demand, adult social care demand, hospital activity trends
- Workforce challenges
- Transport and connectivity – accessibility, active travel infrastructure, digital connectivity
- Climate & environment – flood risk, water resource, air quality and carbon emissions

NCC Public Health Team:

Norfolk's Joint Strategic Needs Assessment (JSNA) [Norfolk's Joint Strategic Needs Assessment \(JSNA\) - Norfolk Insight](#) (health & wellbeing data, wider determinants of health data, population projections, data on access to green space, active travel, air quality, community infrastructure).

A2 Indicative Structure and Content of the GNLP 2045

A2.1 The broad structure of the GNLP 2045

Question 3 - Do you agree with the proposed broad structure of the GNLP 2045 above? If not, please suggest an alternative approach or approaches which could be taken to structuring the plan.

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Answer

The ICB agrees in principle with the mandatory broad structure to meet new plan making standards. However, to ensure positive health outcomes, health infrastructure must not be treated as a secondary consideration, the following recommendations are made by the ICB:

Embed healthcare assessment criteria into every site allocation policy.

Mandate health impact assessments in locally specific policies.

Use healthcare service accessibility as a core metric within the settlement hierarchy.

Norfolk and Suffolk ICB Central Locality Team:

Yes - The proposed structure reflects the requirements of the new planning system and creates a clearer distinction between strategic growth, site allocations and policy requirements.

Might be worth considering measurable outcomes?

A2.2 The Growth Strategy and the Settlement Hierarchy

Question 4 - Which elements of the existing growth strategy and settlement hierarchy do you think have and have not worked well?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

- Housing growth locations aimed where there was access to employment, education, healthcare and public transport, however the healthcare available in that area may have already been constrained without any mitigation being available for healthcare (unable to access CIL funding).
- For the most part small villages have been protected from over development. Village clusters do have a tendency to place a cumulative impact on healthcare infrastructure.
- Statements of community involvement often indicate issues with healthcare capacity, early discussions with the ICB could support the growth strategy and settlement hierarchy.

Norfolk and Suffolk ICB Central Locality Team:

Working well:

- The strategy has generally directed growth towards the most sustainable locations, where access to employment, education, healthcare and public transport is strongest.
- It has helped ensure that larger settlements accommodate proportionately more growth while protecting the character of smaller villages and the countryside.
- The collaborative approach between Broadland, Norwich and South Norfolk has been a significant strength.
- Supporting economic growth.

Not working well:

- While sites have been allocated, residents often perceive that roads, healthcare, schools and community facilities lag behind housing delivery.

Answer

- Limited integration of health and wellbeing objectives – future plans should place emphasis on healthy communities, active travel and reducing health inequalities.
- Future strategy should clearly address the implications of an ageing population.

Question 5

- How can the GNLP 2045 support the development of brownfield sites?
- What development types would you support as part of our updated Growth Strategy?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

- The new NPPF introduces a brownfield first approach. The ICB does not oppose this approach as it would help to protect other green areas and make use of underutilised land especially in urban areas.
- To support this approach the LPA must consider the locations of potential brown field sites from an infrastructure perspective. How far is healthcare away from the site and also what is the capacity status.
- Proposed locations should prioritise active travel routes that are direct and safe to connect the site to local healthcare provision (dental, pharmacy, GP etc.) and to town centres to reduce car dependency.
- Brownfield sites are often high density areas with tight or restricted access. Adequate access must be provided for emergency services such as for an ambulance or fire engine. Further to this disabled parking should also be included.
- Consideration needs to be given to the environmental and physical health determinants. Due to brownfield site's locations often being former industrial units near railway lines, major road networks or current industrial areas, design must factor in mechanisms to manage noise and air pollution, with the use of green buffer zones to protect residents from cardiovascular and mental health issues associated with noise and air pollution.
- Thinking about climate change and the types of locations of brownfield sites, there is also the 'Urban heat island effect' to consider. Incorporating green and blue infrastructure will be important to mitigate extreme heat which has a larger effect on vulnerable demographics.

Due to the new Governments housing targets, it would seem appropriate to adopt a blended approach for the distribution of development however key consideration would include constraints such as landscape designations, environmental sensitivity, infrastructure capacity, road networks/travel plans health inequalities and access to services (Healthcare, utilities etc.) There are pros and cons of each individual approach: *Larger settlements* generally provide better access to healthcare and allow infrastructure improvements to be planned more efficiently because growth is concentrated. However, development may place additional pressure on existing services, requiring timely developer contributions. Smaller rural villages may also continue to face longer journeys and other barriers to healthcare access.

Urban extensions may provide opportunities to deliver new healthcare facilities, improve local provision and reduce pressure on existing services. There is also the

Answer

opportunity to integrate health-promoting infrastructure such as active travel routes and green spaces into these new developments. However, provision will depend on the Norfolk and Suffolk ICB Strategic Estates Strategy, neighbourhood health strategies and the NHS 10-Year Health Plan, so new facilities cannot be guaranteed. This approach may not address rural areas needs and potentially increase health inequalities, along with the increased air pollution which would negatively affect health. As with urban extensions, *new settlements* could incorporate healthcare facilities aligned with population growth and create walkable, healthy communities with accessible housing, green infrastructure and active travel routes. However, whilst new settlements may generate additional demand for healthcare services, this does not automatically imply that new healthcare infrastructure will be delivered within the development itself. In line with neighbourhood health principles and wider system planning, the preferred response may be to expand, reconfigure or enhance capacity within existing facilities serving the surrounding area, where this represents the most sustainable and effective solution for local populations.

Distributing growth across *rural villages* according to infrastructure capacity, accessibility and service provision could help sustain local health services by increasing village populations. However, dispersed development may increase car dependency, disadvantage residents without access to a car and heighten the risk of social isolation among older and vulnerable people.

A *Village Cluster* Approach could direct growth to villages that currently receive limited development and help sustain rural communities. However, it is likely to remain car-dependent and may not improve healthcare access for many residents. It could also concentrate development in more desirable villages, leaving others underserved. There is risk of a cumulative impact on existing healthcare infrastructure taking this approach.

Norfolk and Suffolk ICB Central Locality Team:

- Prioritise brownfield sites within the growth strategy where they are in sustainable locations with good access to services, employment and public transport.
- Work proactively with developers, landowners and infrastructure providers to address access to healthcare, schools and community facilities early.
- Support town centre regeneration by bringing underutilised land and vacant buildings back into productive use.
- Promote the use of brownfield sites for housing, employment, community facilities and health infrastructure where needed and where appropriate. Early discussions with the ICB estates team will be beneficial.
- Ensure that redevelopment delivers high-quality green infrastructure and healthy places rather than simply maximising development capacity.

Question 6 - What areas do you consider to be appropriate for additional growth and what infrastructure, services and amenities would need to be prioritised to enable growth in these locations?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

As stated in previous questions, early engagement with the ICB is vital to understand healthcare infrastructure demand and capacity across the district to enable better site allocation planning and as mentioned above the various areas have their pros and cons.

In regard to infrastructure, services and amenities. The ICB would be interested in ensuring that any additional health infrastructure required in response to population growth is planned in advance and funded via developer contributions. Additional residents occupying homes before an increase of health infrastructure is ready results in challenges and constraint.

To enable sustainable growth without overwhelming existing health infrastructure, a range of physical infrastructure, clinical services and community amenities should be prioritised in strategic planning and developer contributions.

Preventative healthcare infrastructure will have a positive effect on reducing pressure on NHS infrastructure and services by promoting a healthy lifestyle change. Active travel networks that are segregated, well lit, safe and accessible for all can help beneficial effects on peoples physical and mental health. Green and Blue infrastructure such as parks and natural waterways can also benefit overall wellbeing of residents. Areas that allow for community events and allotments promote active lifestyles, healthy food choices and social cohesion.

Norfolk and Suffolk ICB Central Locality Team:

Where new settlements are proposed, health, transport, digital and community infrastructure should be planned and funded as part of the place-making framework from the outset rather than delivered reactively.

Growth should be accompanied by:

- GP capacity expansion.
- Community health facilities.
- Mental health provision.
- Pharmacy access.
- Care and support services.
- Space for multidisciplinary neighbourhood teams.

The plan should prioritise:

- Accessible and adaptable housing, wheelchair-accessible homes & opportunities for downsizing within local communities.
- Transport and connectivity – active travel networks, public travel infrastructure
- Community infrastructure – community hubs, leisure facilities, green spaces/parks
- Digital infrastructure

Answer

- Utilise existing vacant, underused or previously developed land and buildings wherever possible to support the delivery of housing, infrastructure, community facilities and services.
- Ensure meaningful engagement with local communities so that residents' views, concerns and aspirations help shape future development.

Development should only proceed where there is confidence that the required infrastructure, services and community facilities can be provided unconstrained, and where local concerns have been appropriately considered and addressed.

Question 7 – Should any changes should be made to the settlement hierarchy through the new local plan? Please explain your reasons.

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Where a site is allocated to a key service centre or main town due to its proximity to a healthcare facility such as a GP practice, the practices capacity should be assessed at the earliest possible opportunity rather than assuming the development is sustainable, regardless of the presence of nearby healthcare facilities.

The cumulative impact of housing growth must also be considered. A GP practice may have capacity for the first development, but subsequent schemes could face constraints once that development is completed and occupied.

The DfT Connectivity Tool could help assess access to services, but it does not indicate the condition or capacity of healthcare infrastructure. Early engagement with the ICB Estates and Sustainability Team can provide this information and identify any necessary mitigation.

Norfolk and Suffolk ICB Central Locality Team:

The settlement hierarchy should incorporate a stronger assessment of health and wellbeing impacts, ensuring that future growth supports healthy, age-friendly communities and does not place unsustainable pressure on existing health and care services.

A2.3 Site Allocations

There are no questions on site allocations at this early stage of plan-making.

A2.4 Local Policy Coverage

Housing

Question 8 - What measures could the councils take to improve housing delivery rates through the local plan?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Generally speaking, diversifying the housing supply and mechanisms of delivery would help with delivery rates, however these come with their own challenges. Small and medium enterprise housebuilders often build out faster which would boost build rates, however as mentioned above in question 5 a blended approach needs to be considered as larger sites, SUEs and new settlements can provide better access to healthcare and allow infrastructure improvements to be planned more efficiently because growth is concentrated.

As described below the ICB would also encourage the LPA to consider supporting timely delivery of accessible and adaptable dwellings as per the NPPF.

Upfront infrastructure delivery could also be considered. The Councils can structure site policies in a way that stipulates that key infrastructure (Healthcare, Schools etc.) is funded and delivered ahead of house building completion, co-ordinating with providers such as the ICB during the site selection process.

Norfolk and Suffolk ICB Central Locality Team:

Given the ageing population, improving delivery should not focus solely on housing numbers. The local plan should support the timely delivery of accessible and adaptable homes, extra care housing and specialist accommodation that enables people to live independently for longer and reduces pressure on health and social care services.

NCC Public Health Team:

NCC Public Health supports policies within the GNLP that:

- Maximise delivery of affordable housing.
- Require accessible and adaptable homes as standard to support an ageing population and people with disabilities.
- Promote healthy homes through high-quality design, adequate internal space, access to natural light, ventilation and private outdoor space.

Question 9 - The plan must include 10% of homes on both small and medium-sized sites. Should the plan aim to allocate a higher proportion than this and, if so, why?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

The ICB would urge the local authorities that make up greater Norwich to assess the pros and cons of high proportions of homes on small to medium sites.

Whilst there are some positives from this approach

- Fast delivery of homes
- Supports smaller building contractors
- Often associated with infill sites or Brownfield sites
- Lower infrastructure impacts (as stand-alone projects)

There are also negatives

- Limits delivery of strategic infrastructure (fewer developer contributions available)

Answer

- What developer contributions can be secured are often not enough to complete meaningful mitigation projects.
- Reduces ability to design comprehensive environments with active travel routes.
- Risk of not delivering enough affordable housing on a site due to viability issues.
- Cumulative Impact of multiple small/medium developments on healthcare facilities, road networks etc.

The above needs to be carefully considered when deciding on the proportion of allocations to different site types. However, the ICB has commented on the different types of development in question 5 above.

Norfolk and Suffolk ICB Central Locality Team:

To improve housing delivery rates, the councils should ensure that sufficient deliverable sites are available throughout the plan period and maintain a balanced mix of strategic, medium-sized and small sites. This would help reduce reliance on a small number of large developments and improve resilience if delivery on major sites is delayed.

NCC Public Health Team:

- Ensure housing developments provide access to green infrastructure, active travel routes, healthcare, education and community facilities.
- Support specialist housing that enables people to live independently for longer and reduces pressures on health and care services.

Question 10 - What should the GNLP 2045 do to assist the delivery of:

- affordable housing
- accessible and adaptable homes
- specialist housing
- gypsy and traveller and travelling show people sites
- self- and custom-build housing

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

The local plan should have clear policy mechanisms, site allocations and delivery plans to ensure that affordable housing targets are met without any financial viability issues.

There should be...

- Clear evidence of need through a local housing needs assessment (which we understand from the topic paper is outdated and currently under review).
- Specific policies for affordable housing with percentage targets (the previous GNLP target was 33% on all sites except for in Norwich where this reduced to 28%, the ICB would expect to see an uplift given the health inequalities in Norfolk).
- Policies which specify tenure requirements (opportunity to encourage NHS workforce to the area through key worker accommodation)
- Mixed site size allocations to allow smaller building contractors to work with housing associations

Answer

- A policy for affordable housing to meet specialist accommodation standards (M4(3) of the building regulations standards, to allow residents to stay as independent as possible into later life.
- Require new homes to meet Building Regulations M4(2) as standard, with an appropriate proportion meeting M4(3), to increase the supply of accessible and adaptable housing and reflect population health and social care needs (based on the housing topic paper at least 40% of specialist accommodation will be M4(2) or M4(3), this needs to extend as a general policy across all sites).
- Dementia-friendly design to improve safety, independence, comfort and quality of life, while reducing confusion and anxiety (the number of people living with dementia is growing significantly as the population ages, Norfolk already has a high older population and this will require proactive planning to meet future housing needs).
- Ensure homes are designed to prevent damp and mould, reducing respiratory illness, demand for primary and acute care, and the risk of ambulance conveyances, while supporting mental wellbeing.
- Promote well-insulated homes that maintain stable indoor temperatures and reduce cardiovascular strain, particularly for older people and other vulnerable residents, especially given the likelihood of more frequent extreme weather patterns.

Norfolk and Suffolk ICB Central Locality Team:

- Ensure affordable housing meets identified housing need.
- Support a range of tenures including social rent, affordable rent and shared ownership.
- Encourage the delivery of wheelchair-accessible homes to promote lifetime principles that enable residents to remain independent as their needs change.
- Ensure homes are located and have access to services, public transport and community facilities.
- Support age-friendly neighbourhood design with safe walking routes and access to green spaces.

Question 11 - Should the GNLP 2045:

- Provide additional coverage of rural housing and development outside settlement limits beyond that contained in the draft NPPF?
- Retain aspects of existing local policy concerning housing outside settlement limits, such as self-build and custom-build housing, barn and other rural building conversions, replacement dwellings, the subdivision of existing dwellings, and dwellings connected to rural enterprises?

Answer

Car dependent rural developments without access to basic services can worsen health inequalities, isolation and increase health risks of vulnerable/elderly residents.

Answer

The existing policies for development outside settlement boundaries does still provide an element of flexibility for rural communities. Retaining these policies will help to control isolation, car dependency and health inequalities.

The Economy

Question 12 - How should the GNL 2045:

- deliver the right types and mixes of flexible and adaptable commercial spaces in the right places?
- help our growth sectors to thrive, possibly including protection of site-specific industries?
- support other opportunities for economic growth, including the rural economy?
- strengthen skills and workforce development?
- plan for freight and logistics?
- support small businesses and start-ups?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Where existing employment land is poorly located or unsuitable in scale, allocating additional sites across the area could support a more sustainable local economy. New employment areas should have regular public transport links to avoid disadvantaging residents who do not have access to a car. Locating jobs near housing could also shorten commutes and encourage more sustainable active travel modes. Reliable broadband is essential, particularly for rural communities and home-based workers. Healthcare is a major employer in Greater Norwich, and demand for staff is expected to increase as the population ages. Affordable key-worker housing close to healthcare facilities could help attract and retain healthcare workforce.

Employment, income, and education are key determinants of health. Economic vulnerability can worsen health gaps by restricting access to essentials, increasing daily stress and long term mental health conditions and lower care qualities due to barriers such as cost of childcare or travel. It can stop people from being able to afford healthy foods, safe housing and access to healthcare all leading to worse health outcomes.

Norfolk and Suffolk ICB Central Locality Team:

From a Greater Norwich perspective, I would focus on ensuring economic growth is linked to infrastructure, skills, innovation, health and sustainable communities, rather than simply allocating employment land.

- Provide a range of employment spaces, from start-up units and co-working space to larger commercial and industrial premises.
- Locate commercial development close to public transport, active travel routes and housing.
- Support mixed-use developments that reduce the need to travel.
- Ensure digital infrastructure is available from the outset.
- Encourage adaptable buildings that can respond to changing business needs over time.
- Promote the reuse of vacant or underutilised buildings where appropriate.

Answer

- Support expansion opportunities around existing economic clusters such as Norwich Research Park, the University of East Anglia and major employment locations.
- Ensure sufficient utilities, water, transport and digital infrastructure are available to support growth.
- Strengthen links between research institutions and businesses to encourage innovation and investment.

NCC Public Health Team:

NCC Public Health notes that good quality employment is a key wider determinant of health.

The GNLP 2045 should:

- Support employment opportunities that are secure, accessible and provide fair pay and good working conditions.
- Encourage developments to promote health places and encourage sustainable and active travel
- Encourage developments that improve access to education, skills and training opportunities.
- Support local centres and mixed-use developments that reduce the need to travel and strengthen community cohesion.
- Recognise the contribution of economic development to reducing health inequalities.

Question 13 - How should the GNLP 2045:

- help strengthen the city, town, district and local centres?
- deal with thresholds for retail impact assessments?
- address the evening and the late-night economy in the city centre?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

The ICB would encourage a flexible approach, which encourages multifunctional town and district centres that co-locate retail with healthcare and community services, residential use and workspace. 'Health on the high street' could be a potential option, this could also provide an increased footfall for local businesses and support 15 minute neighbourhoods.

Whilst this does have potential the ICB would need to be included in discussions with the Local planning authority to establish if any model like this could work in the location being proposed.

There should also be consideration for active travel, ensuring good quality public space, green infrastructure and safe walking and cycling routes to connect nearby residential area directly to central hubs.

Norfolk and Suffolk ICB Central Locality Team:

- Support a diverse mix of uses including retail, healthcare, community facilities, leisure, culture, housing and employment.

Answer

- Encourage regeneration of vacant and underused buildings.
- Promote town centres as destinations for everyday services rather than solely retail.
- Improve accessibility through public transport, walking and cycling infrastructure.
- Support independent businesses and local markets.
- Encourage residential development within and around centres to increase footfall and vitality.
- Ensure centres remain accessible and inclusive for older people and people with disabilities.
- Protect key community assets and services.
- Allow flexibility where proposals bring significant community, employment or regeneration benefits.
- Encourage a wider range of activities beyond traditional drinking venues, including cultural, leisure, entertainment and family-friendly activities.
- Promote good design, lighting, accessibility and public safety.
- Support sustainable transport options to enable safe travel during evening hours.
- Encourage cultural and creative industries that contribute to a vibrant city centre.

Question 14 - How can the GNLP 2045 support the ongoing development of tourism, whilst responding sensitively to the local area?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Sustainable tourism planning should not only look at the environmental protection but also the management of seasonal population surges and the pressure this causes on health services. Local plans should write into policy for major leisure and tourism proposals to include health impact assessments to measure the impact on local GP capacity.

Seasonal visitors to the area results in high traffic congestion and poor air quality as a result, this has a high impact on vulnerable residents with respiratory conditions. The local plan can require that all major visitor destinations are directly connected to high quality walking, wheeling and cycling networks and where this may not be possible consider park and ride stations to limit the number of cars on the road.

Visitor locations should also comply with the M4(2), M4(3) standards and inclusive design to support inclusive health for elderly visitors, disabled residents and those with limited mobility, design could include step free access and changing places toilets.

Norfolk and Suffolk ICB Central Locality Team:

- Protecting and enhancing Greater Norwich's natural, historic and cultural assets, which are key drivers of the visitor economy.
- Supporting investment in visitor attractions, accommodation, hospitality businesses and cultural venues in appropriate locations.

Answer

- Encouraging year-round tourism opportunities to reduce seasonal pressures and support local businesses.
- Improving sustainable transport options, including public transport, walking and cycling routes to key destinations.
- Supporting the sensitive reuse of existing buildings for tourism and visitor accommodation where appropriate.
- Promoting green infrastructure, heritage assets and access to the countryside while protecting biodiversity and landscape character.
- Supporting local businesses, food producers and rural enterprises that contribute to the visitor economy.
- Ensuring tourism development is accompanied by appropriate infrastructure, including transport, public facilities and waste management.
- Respects the character and identity of local communities.
- Avoids adverse impacts on environmentally sensitive areas and designated sites.
- Does not place unsustainable pressure on local services, infrastructure or housing availability.
- Considers the impacts of visitor numbers on traffic, parking and congestion.
- Involves local communities in shaping tourism proposals.
- Supports developments that contribute positively to resident wellbeing as well as visitor experience.

Infrastructure

Question 15 - How can infrastructure delivery be well co-ordinated and funded to support growth?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Greater consideration could be given to healthcare infrastructure within the planning process, particularly given that it has received less emphasis than areas such as education and transport in recent years. This remains evident in the emerging Local Plan, where healthcare is not currently reflected within the infrastructure section or the Community Infrastructure Levy (CIL) funding framework. The ICB has also previously been advised that local policy limits the ability for healthcare projects to access CIL funding.

Housing growth generates demand not only for transport and education services, but also for healthcare. New developments bring additional residents who will require access to GP services, immunisations, community healthcare and hospital care. Ensuring that growth is supported by appropriate healthcare infrastructure is therefore an important critical component of sustainable development.

The National Planning Policy Framework identifies economic, environmental and social objectives as the three pillars of sustainable development. Healthcare, alongside education, forms a key part of the social infrastructure needed to support communities. While transport and education are rightly recognised within infrastructure planning arrangements, there may be an opportunity to strengthen consideration of healthcare needs and the mechanisms available to support them.

Answer

In particular, reliance on sometimes limited and uncertain Section 106 contributions can make it more challenging to secure the infrastructure required to meet additional healthcare demand arising from growth. A more balanced approach to infrastructure planning and funding could help ensure that all essential services are appropriately supported as communities expand.

Norfolk and Suffolk ICB Central Locality Team:

Ensure that infrastructure delivery is planned, coordinated and funded alongside growth from the earliest stages of plan-making. This should include close collaboration between local authorities, NHS organisations, education providers, utility companies, transport authorities, developers and community stakeholders.

NCC Public Health Team:

Infrastructure delivery should:

- Prioritise active travel infrastructure, including walking, wheeling and cycling networks.
- Ensure new developments provide safe, attractive and connected routes to key destinations.
- Facilitate access to healthcare, leisure, education, employment and community facilities.
- Consider health infrastructure requirements arising from population growth.

Infrastructure planning should seek to maximise opportunities for physical activity and social connectivity while reducing car dependency.

Question 16 - How should the GNLP 2045 support

- Improved accessibility to housing, employment, services, sports and other community facilities?
- Delivery of wastewater treatment capacity and address nutrient neutrality?
- Clean power and net zero objectives?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Growth should be directed to locations with good access to jobs, healthcare, education and community services, creating sustainable, walkable neighbourhoods with strong public transport, walking and cycling connections. New development should provide accessible community facilities, green spaces and inclusive housing that meets the needs of people of all ages, including an ageing population, while supporting digital connectivity. Infrastructure delivery should be planned alongside growth through early collaboration with service providers, ensuring sufficient wastewater and utility capacity and protecting habitats and watercourses. Development should also promote energy efficiency, electric vehicle infrastructure, climate resilience and the enhancement of green infrastructure to support carbon reduction and environmental sustainability.

Norfolk and Suffolk ICB Central Locality Team:

Answer

- Focus growth in locations with good access to employment, healthcare, education and community services.
- Create walkable neighbourhoods where everyday services can be accessed without reliance on private cars.
- Improve public transport connectivity between rural communities, market towns and Norwich.
- Expand safe walking and cycling infrastructure.
- Ensure new developments include accessible community facilities, green spaces, leisure opportunities and sports provision.
- Promote inclusive design so homes, public spaces and services are accessible to people of all ages and abilities.
- Support digital connectivity to improve access to employment, healthcare and public services.
- Plan for the needs of an ageing population through accessible housing and proximity to services.
- Work closely with water companies, environmental bodies and infrastructure providers from the earliest stages of planning.
- Ensure wastewater treatment capacity is planned alongside housing and employment growth.
- Identify areas where infrastructure upgrades are required before development.
- Ensure development does not adversely affect protected habitats and watercourses.
- Support energy-efficient homes and building design.
- Support electric vehicle charging infrastructure.
- Protect and enhance green infrastructure that contributes to carbon reduction and climate resilience.
- Ensure any new development is designed to be resilient to the impacts of climate change.

The Environment

Question 17 - Should the GNLP 2045:

- Set the most demanding local standards possible for water efficiency?
- Include higher or new standards for nature recovery and allocate sites for nature recovery or biodiversity enhancement?
- Identify sites for enhanced green infrastructure, including Suitable Alternative Natural Greenspace, and set local green infrastructure standards?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Set the most demanding local standards possible for water efficiency?

- This would help to mitigate serious water stress as classified by the environment agency and reduce pressures on water resources. Reductions would also help residents with household bills helping energy efficiency and fuel poverty reduction.

Answer

- This could, however, result in increased developer costs which would also then have an impact on viability challenges. This could lead to developers not able to pay developer contributions. LPAs would also be required to provide evidence to justify the standard, as per the NPPF.
- Include higher or new standards for nature recovery and allocate sites for nature recovery or biodiversity enhancement?
- Allocating specific sites for nature recovery aligns with the Norfolk Local Nature recovery Strategy. Strategic nature allocations would also improve local air quality and reduce the heat effects and provide natural spaces that support physical and mental health.
- This could result in competing land use pressures where the available land could be used for housing or employment.
- There are also the long term management obligations that need to be considered, however if planned well this should not be a cause to not go ahead with nature recovery allocations.
- Identify sites for enhanced green infrastructure, including Suitable Alternative Natural Greenspace, and set local green infrastructure standards?
- Providing GI and SANGs helps to divert recreational pressures such as walking away from sensitive habitats such as the Broads.
- Clear GI standards provides developers with explicit requirements early in the planning cycle.
- Well planned GI can integrate walking and cycling routes with accessible parks which encourages a more active lifestyle which can help to reduce or prevent physical and mental health issues.
- SANGS are generally easier to deliver where large open spaces are available, but much harder to accommodate in space-constrained areas such as Norwich city centre.

Norfolk and Suffolk ICB Central Locality Team:

Yes - Given the existing and projected pressures on water resources within Greater Norwich, the GNLP 2045 should seek the highest practical standards of water efficiency for new development. This will help improve resilience, reduce environmental impacts and support sustainable growth over the plan period.

Yes - The GNLP 2045 should include ambitious but deliverable measures to support nature recovery and biodiversity enhancement. Allocating land for habitat restoration and strengthening ecological networks will help ensure that growth contributes positively to environmental sustainability and community wellbeing.

Yes - Green infrastructure plays an important role in supporting physical activity, mental wellbeing, social connection and healthy ageing. Access to attractive green space should therefore be considered a core element of sustainable communities rather than an optional addition.

NCC Public Health Team:

NCC Public Health supports:

- Strong standards for green infrastructure and access to nature.
- Measures that improve biodiversity and nature recovery.
- High standards of water efficiency and environmental sustainability.

Answer

- Design approaches that mitigate overheating and climate-related risks.
- Healthy placemaking principles, including walkable neighbourhoods, access to services, public open space, community facilities and opportunities for social interaction.

Question 18 - How should the GNLP 2045 plan for high quality design that promotes sustainability and responds to local landscape and townscape character and the historic environment?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Design codes can help secure high-quality, sustainable development. Homes should maximise energy and water efficiency, remain accessible and adaptable as residents' needs change, and reflect local health and social care requirements. They should also prevent damp and mould, which can worsen respiratory conditions, affect mental wellbeing and increase demand for healthcare. Good insulation can maintain stable indoor temperatures and reduce cardiovascular strain, particularly for older and vulnerable residents.

Important views and landmarks should be safeguarded. New developments should also create walkable neighbourhoods with safe, clearly signposted and accessible walking and cycling routes connecting residents to existing local services.

Norfolk and Suffolk ICB Central Locality Team:

The GNLP 2045 should promote high-quality, sustainable and locally distinctive design that respects landscape, townscape and heritage assets while creating healthy and inclusive communities. New development should be energy efficient, climate resilient, accessible, well connected to services and green spaces, and designed to support people of all ages to live healthy and independent lives.

A3 Evidence

Question 19 - Should:

- the scope of any of the proposed evidence studies be changed?
- any other evidence be updated or commissioned to prepare the GNLP 2045?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

As highlighted in question 2 the use of Norfolk insights for health demographics and the ICBs demand and capacity information will help to plan where housing would be better suited given any healthcare capacity constraints.

Norfolk and Suffolk ICB Central Locality Team:

Answer

- Consider the Norfolk & Suffolk joint strategic needs assessment (JSNA)
- Norfolk & Waveney Integrated Care Strategy
- Norfolk & Waveney Population Health Management Strategy
- Public health fingertips population data and future projections

Part B - Consulting on Plan-making

Question 20 - Do you consider that our proposed approach to engagement at the statutory consultation stages correctly identifies:

- the purpose of each stage of engagement?
- the target audience(s) at each stage?
- appropriate engagement methods throughout?

Please explain your answers.

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Early engagement with the NSICB Estates and Sustainability Team should be a priority throughout the local plan process. The ICB would be happy to meet with developers and the local authority at pre-app stage of applications to ensure healthcare requirements can be met. Providing local authorities with timely information on healthcare infrastructure capacity, service demand and future requirements will help inform decisions about the location and scale of housing growth over the next 20 to 30 years. While local authorities are likely to understand where existing healthcare facilities are located, they may not have access to detailed information about current capacity pressures or the ability of those facilities to accommodate future population growth. Early collaboration will therefore support more informed and sustainable planning decisions.

Engagement and consultation activities should be designed to be inclusive and accessible to a wide range of audiences. Information should be tailored to different stakeholder groups and provided in formats that reflect varying levels of digital confidence, literacy and accessibility needs. Consultation materials should be available in plain English and, where appropriate, translated into relevant community languages, with alternative formats such as large print and audio versions made available to ensure all communities can participate effectively.

Accessibility considerations will be particularly important for residents affected by transport barriers, health conditions, disabilities or limited digital access. In-person engagement events should therefore be held in accessible venues and offered at a range of times to maximise participation. Digital engagement activities should include clear and simple instructions for those who are less confident using online platforms. Flexible response mechanisms should also be provided, allowing participants to raise issues and concerns that may not be captured through standard online questionnaires.

Targeted outreach activities will be important to securing participation from under-represented and seldom-heard groups. Working with voluntary organisations, charities and trusted community groups can help identify and engage isolated or vulnerable

Answer

residents through familiar and accessible channels. Providing consultation materials in translated and accessible formats, alongside both digital and non-digital response options, will further support inclusive engagement and help ensure that a diverse range of views is captured throughout the plan-making process.

Norfolk and Suffolk ICB Central Locality Team:

The proposed approach broadly identifies the correct purpose, audiences and engagement methods for each consultation stage. However, particular emphasis should be placed on engaging and underrepresented communities, younger and older people, health and care partners, VCSE organisations and rural residents. Engagement should be accessible, ongoing and clearly demonstrate how feedback has influenced plan development. A mixture of digital and face-to-face methods should be used to maximise participation and ensure the GNLP 2045 reflects the needs of all communities across Greater Norwich.

Question 21 - Are there any additional methods of engagement you would like to see included in our engagement strategy – particularly where these would help us to support hard to reach groups?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

As stated in question 20, Engagement and consultation activities should be designed to be inclusive and accessible to a wide range of audiences. Information should be tailored to different stakeholder groups and provided in formats that reflect varying levels of digital confidence, literacy and accessibility needs. Consultation materials should be available in plain English and, where appropriate, translated into relevant community languages, with alternative formats such as large print and audio versions made available to ensure all communities can participate effectively.

Norfolk and Suffolk ICB Central Locality Team:

Yes. Additional targeted engagement methods should be used to reach underrepresented groups, including working through community organisations, health and care services, schools, youth groups, faith organisations, parish councils and VCSE partners. Pop-up events, interactive mapping tools and attendance at existing community events may help engage people who would not normally participate in formal consultations. Particular efforts should be made to engage younger people, older residents, people with disabilities, carers, rural communities and those experiencing health inequalities.

Final Question

Question 22 - Is there anything else you think is missing from this consultation or you would like to comment on in relation to the GNLP 2045?

Answer

Norfolk and Suffolk ICB Estates and Sustainability Team:

Sustainable development, health infrastructure and wider determinants of health are essentially linked. This local plan represents an opportunity for health to be written into and embedded through all the site allocation policies and more broadly. As housing and population growth increases through to 2045 there will be a requirement for equivalent investment in health infrastructure and public health principles, without this there is risk of health inequalities widening and placing unsustainable pressure on local healthcare infrastructure and services. By weaving health throughout the GNLP 2045 policies, the councils can build healthy, resilient and inclusive communities that can reduce preventable illness and support a sustainable healthcare system in the future.

Norfolk and Suffolk ICB Central Locality Team:

Greater emphasis should be placed on population health, healthy ageing, health inequalities, infrastructure capacity and measurable outcomes that demonstrate how growth is improving quality of life for residents across Greater Norwich.

NCC Public Health Team:

NCC Public Health recommends a health in all policies approach for the GNLP 2045 and the adoption of healthy placemaking and health inequality objectives throughout the plan. The plan should recognise the significant influence that housing, employment, transport, environment, community infrastructure and access to services have on health and wellbeing.

The GNLP presents an important opportunity to improve population health outcomes, support healthy ageing and reduce health inequalities across Greater Norwich.

Further to the scoping opinion questions above, please see answers below to a selection of the questions being raised in the infrastructure topic paper:

Greater Norwich Local Plan 2025–2045 Infrastructure Topic Paper

3. Early policy direction of thoughts and answers Infrastructure:

Q. How can the GNLP make the best use of the existing transport network for all users?

Answer

Developing brownfield and infill sites within established urban areas can make better use of existing road and public transport networks. However, infrastructure in these locations may already be at or near capacity, so the plan should take a balanced approach to the type and distribution of housing development.

Answer

Development policies could also include adding step free access to stations, dropped kerbs and level access onto transport.

Q. How can the GNLP maximise the opportunities and accessibility for people to choose walking, cycling and wheeling for everyday journeys?

Answer

The local plan can maximise opportunities by establishing spatial strategies, transport policies and design standards that make active travel the most direct, safe and convenient option for everyday resident journeys.

Apply 15-minute neighbourhood principles and assess potential site allocations against their active travel connections to key services before including them in the plan.

Incorporate best-practice standards, such as those published by Active Travel England, directly into policy to require dedicated space for active travel

Routes should be accessible to people of all abilities, with no barriers or layouts that restrict wheelchair or mobility-scooter use. Inclusive design should provide dropped kerbs, smooth surfaces, tactile paving at crossing points, clear wayfinding and rest areas along routes.

Q. How can the GNLP maximise the opportunities and accessibility for people to choose bus travel for everyday journeys?

Answer

By ensuring housing developments meet a minimum residential threshold to generate the additional number of residents needed for frequent and commercially viable bus services. Where there is good bus connectivity, encourage its use by restricting the number of parking spaces available in urban areas, this will help to promote a different mode of transport.

Q: Should the GNLP consider a formal policy approach to new solar farms and related infrastructure and, if so, what should this broad policy approach be?

Answer

Having a dedicated formal policy for solar farms and related infrastructure would have its pros and cons...

Pros

- Developers would be required to contribute to CIL funding. They could also be required to meet certain conditions such as landscape buffering and local job creation.
- Would provide a method to meet carbon reduction targets.

Answer

- Can ensure that sensitive areas such as areas of natural outstanding beauty, heritage sites and green belts are excluded from potential site allocations.

Cons

- If policy criteria is too strict it could block projects.
- A change in solar technology could happen relatively quickly and specific policy may then not fall within scope and need to be re-based.

Major solar developments change the physical environment. An effective local policy should take into consideration the following healthcare areas:

- Visual feature: solar panels can release glare and change the countryside, this can cause stress to local residents, there should be a form of visual screening to protect against this.
- PROWS: Rural solar farm locations often span areas containing footpaths and bridleways. Policy should protect these recreational corridors and ensure they remain accessible to promote exercise and active lifestyles.
- Respiratory conditions: The construction phase of solar farms will increase noise and dust, this can exacerbate local resident's respiratory conditions such as asthma.
- Any policy should also have strict safety conditions in place due to the risk of battery storage (BESS) overheating and the release of chemical smoke if a fire was to start. Early engagement with the local emergency services should be considered as part of policy writing.

Q: Do you agree that broadband connectivity does not need to be specifically addressed in the GNLP 2045? If not, please explain why and how it could be addressed?

Answer

A good reliable broadband service is essential for healthcare especially in rural areas, where it allows patients that may not be readily able to access a physical appointment to take advantage of a remote consultation. To do this patients will need access to certain mobile phone apps or video calling capable computers, this can also be the case for ordering prescription medications. A good and reliable connection helps these tools work to their full ability and thus reducing delays in care.

A good internet connection is also vital for care homes, community nurses and paramedics to enable staff to view patient files quickly, internet connectivity can also help care home residents or patients that are isolated stay in contact with family which has a positive effect on their mental health. There is also the emergence of connected medical devices, if internet connection is not equal across the county this can result in widening the health inequalities gaps where some people are able to use services (devices) that others cannot.

Q: How should the GNLP best work with the ICB and other partners to make best use of existing healthcare facilities and, where relevant, plan for new/expanded facilities?

Answer

The local plan's infrastructure delivery plans should include potential projects identified by the ICB and other healthcare providers.

Developer contributions will be needed to support new or expanded healthcare infrastructure.

Early engagement with the ICB would allow planning and healthcare teams to assess existing services and jointly identify high-impact upgrades or expansions. This should include opportunities to develop the neighbourhood health centres mandated by NHS England, bringing multiple services together in accessible, one-stop locations.

Early discussions with the ICB could also identify opportunities to provide healthcare services within flexible community spaces, making them more convenient and accessible. The plan should support this through suitable policies and site allocations, while ensuring existing facilities are served by frequent buses and safe, accessible walking and cycling routes. Where a need is identified, close collaboration with the ICB could help modernise existing healthcare sites as accessible neighbourhood health centres.

In conclusion, the ICB encourages the GNLP 2045 to embed health and wellbeing throughout the plan, ensuring that growth is supported by timely investment in healthcare infrastructure, accessible services and healthy, inclusive communities via S106 and CIL. We thank the Greater Norwich authorities for the opportunity to respond to this consultation and look forward to continued collaboration as the plan progresses.

Yours faithfully,

NHS Norfolk & Suffolk ICB – Estates and Sustainability Team