

via e-mail

The Greater Norwich Local Plan
2045 Team (Floor 5),
Norfolk County Council
County Hall
Martineau Lane
Norwich
Norfolk
NR1 2SG

NCC contact number: 0344 800 8020
Textphone: 0344 800 8011

Your Ref: GNLP 2045
Date: 16 September 2026

Ref: FW2026_0690
Tel No.: 0344 800 8020
Email: llfa@norfolk.gov.uk

Case Officer: Sarah Luff, Strategic Flood Risk Planning Officer
Reviewed by: Dean Shelton, Senior Flood Risk Officer

Dear Sir / Madam,

Norfolk LLFA Response to Greater Norwich Local Plan 2045 Scoping Consultation

Thank you for your consultation on the above site, received on 17 August 2026. The LLFA have reviewed the submitted information and have the following responses to make.

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

The LLFA notes there is no mention of flood risk as a specific threat to existing or future communities. While it could be included under the significant climate change impacts, as there is a significant existing issue of flood risk within the Greater Norwich area, it is not merely linked to climate change and should be mentioned in its own right so that it is given due consideration in the new local plan.

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?
No comment

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.
No comment

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

The LLFA notes that while we would not normally comment on the settlement hierarchy we would like to note there needs to be a continued avoidance of inappropriate development in flood risk areas.

Question 5

- **How can the GNLP 2045 support the development of brownfield sites?**

The LLFA requests that a policy is included to specifically require that brownfield development sites should attenuate the surface water runoff from the proposed development site to the greenfield runoff rate.

- **What development types would you support as part of our updated Growth Strategy?**

The LLFA request that a greater provision of space is available flood risk management, sustainable drainage systems and other blue / green infrastructure for all development types. This is especially the case for development locations with existing flood risk and surface water issues that are likely to escalate as the impact of climate change increase.

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?

The LLFA considers that a greater provision of space is available flood risk management, sustainable drainage systems and other blue / green infrastructure for all development types would enhance the quality of the proposed development that would offer an increase in the economic value and quality of life and appeal to the area, while also managing flood risk in a sustainable manner.

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

No comment

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

No comment

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?

No comment

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 showpeople sites**
- **self- and custom-build housing**

The LLFA notes that while we would not normally comment on such matters, we would like to note there needs to be a continued avoidance of inappropriate development in flood risk areas, including the consideration of safe access and egress during flood events.

Question 11 - Should the GNLP 2045:

- **Provide additional coverage of rural housing and development outside settlement limits beyond that contained in the draft NPPF?**

The LLFA requests that consideration is given to flood risk management and the requirement of sustainable drainage systems for all size and types of development.

- **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?**

The LLFA requests that consideration is given to flood risk management and the requirement of sustainable drainage systems for all size and types of development.

Question 12 - How should the GNLP 2045:

- **deliver the right types and mixes of flexible and adaptable commercial spaces in the right places?**

No comment

- **help our growth sectors to thrive, possibly including protection of site-specific industries?**

No comment

- **support other opportunities for economic growth, including the rural economy?**

No comment

- **strengthen skills and workforce development?**

No comment

- **plan for freight and logistics?**

No comment

- **support small businesses and start-ups?**

No comment

Question 13 - How should the GNLP 2045:

- **help strengthen the city, town, district and local centres?**

No comment

- **deal with thresholds for retail impact assessments?**

No comment

- **address the evening and the late-night economy in the city centre?**

No comment

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

No comment

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

The LLFA note that surface water and flood risk management infrastructure is not included in the infrastructure considerations. At present the CIL offering also does not include flood risk and surface water management. The LLFA suggest that including flood risk and surface water management into the infrastructure delivery consideration and CIL potential would significantly improve the potential to fund and facilitate improvements to flood risk.

Question 16 - How should the GNLP 2045 support

- **Improved accessibility to housing, employment, services, sports and other community facilities?**
No comment
- **Delivery of wastewater treatment capacity and address nutrient neutrality?**
No comment
- **Clean power and net zero objectives?**
No comment

Question 17 - Should the GNLP 2045:

- **Set the most demanding local standards possible for water efficiency?**
Yes. There should also be encouragement for full consideration in the potential of using captured surface water runoff.
- **Include higher or new standards for nature recovery and allocate sites for nature recovery or biodiversity enhancement?**
No Comment
- **Identify sites for enhanced green infrastructure, including Suitable Alternative Natural Greenspace, and set local green infrastructure standards?**
Yes. Ideally this should interlink with the sustainable drainage requirements and the LLFA Developer Guidance.

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?

There should be a requirement to include sustainable drainage features within all sizes and types of development. In Norfolk and Norwich, the local landscape and townscapes have always been intrinsically linked. Therefore, the inclusion on sustainable drainage features for all types and scales of development would be appropriate in this context.

Question 19 - Should:

- **the scope of any of the proposed evidence studies be changed?**
Yes. In relation to the SFRA level 2, the scope indicates that where appropriate the exception test will be applied. For an exception Test to be completed a site specific

FRA for all sources of flood risk will need to be prepared to support the undertaken of the Exception Test. This is typically left for the applicant or the site promotor to undertake as it can result in attracting significant costs. Therefore, the wording in the SFRA Level 2 scope may be appropriate to amend to "identify the need to apply the Exception Test and where appropriate require the site promoter to undertake a site specific Flood Risk Assessment".

- **any other evidence be updated or commissioned to prepare the GNLP 2045?**
The Norwich Urban Areas SWMP was originally prepared in 2014 and is now over 12 years old. There have been improvements in the proposed surface water methods. It would be appropriate for the Greater Norwich Local Plan to undertake an update to this work that would be integrated in the SFRA.

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?**
No comment
- **the target audience(s) at each stage?**
No comment
- **appropriate engagement methods throughout?**
No comment

Please explain your answers.

No comment

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?

No comment

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?

In relation to the changes that have been made to the NPPF recently, the LLFA requests that direct reference is made to the LLFA Developer Guidance and advice, along with direct reference to the inclusion of sustainable drainage within proposed developments of all types and sizes. This would ensure that the LLFA would be able to continue to provide technical advice and support to the local planning authority(ies) within the local plan area.

Yours sincerely

Sarah Luff

Strategic Flood Risk Planning Officer

On behalf of Norfolk County Council as Lead Local Flood Authority

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Disclaimer

The LLFA have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If The LLFA have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue.