

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

Our ref: AE/2026/131348/CS-
01/IS1-L01

Date: 28 September 2026

Dear Sir/Madam

Greater Norwich Local Plan 2045 Scoping Consultation

Thank you for your consultation on the Greater Norwich Local Plan Scoping Consultation survey. We have reviewed the survey questions, and our comments are set out in the relevant sections below.

We appreciate the opportunity to influence the Local Plan at this early stage and would encourage your authority to engage in our [detailed charged advice service](#) for detailed advice on the preparation of background studies such as the proposed Strategic Flood Risk Assessment and Water Cycle Study.

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

Flood Risk

- We note that flood risk isn't mentioned as a threat to communities across the Greater Norwich area. There are extensive areas of flood risk in the Plan area that could prove obstacles to growth.
- Climate change should be recognised as a threat that will increase the probability of extreme weather and the associated risk of surface water and fluvial flooding.

Ecology and Biodiversity

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Iceni House Cobham Road, Ipswich, IP3 9JD.
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- Challenges around growth appear to be largely attributed to environmental constraints. From an environmental perspective, this serves as a timely reminder that the natural world is already under significant pressure from both development and climate change.
- Water resource constraints are correctly listed as a threat. It should be noted that significant unmitigated growth will further exacerbate pressures on water resources, which can subsequently put pressure on sensitive habitats and species through habitat loss, fragmentation and disturbance. This is linked to threats to water quality and the SSSIs and SACs in the area.

Water Resources

- The existing Threat, “Significant utilities and water resource constraints limiting growth”, is appropriate and should be retained. We suggest making clear that this includes the timing and deliverability of strategic water supply schemes, reliance on demand reduction, and the risk that growth can come forward faster than sustainable water supply infrastructure.
- An additional Opportunity could be added: coordinated regional and water-company planning, together with higher water efficiency, can support sustainable growth while improving drought resilience and reducing pressure on the water environment.

Water Quality

- Utilities constraints are listed under threats, which is assumed to include wastewater treatment. There are a number of Waste Water Treatment Works (WWTW) with limited or no permitted treatment capacity in the Greater Norwich area so this should be a significant consideration as the new Plan is developed.

Climate Change

- Climate mitigation and adaptation policies should be incorporated. Mitigation policies should include a carbon reduction target, considering all areas of the council’s influence. Climate adaptation policies should explore designing community level resilience for the possible future impacts of climate change, such as hotter drier summers, warmer wetter winters.
- The Plan should promote sustainable design, nature-based solutions and Sustainable Drainage Systems (SuDS) where possible. This could include measures such as tree planting, green/brown roofs, permeable surfacing, rain gardens and linked localised wetland habitat. All of these measures can help adapt to climate change impacts by managing surface water, providing ecological improvements and reducing the urban heat-island effect.
- The Plan should identify that climate resilience needs to be fully considered as part of new development to help support communities with the possible future effects of climate change. This may include, for example, policies to encourage passive house building techniques including thermal mass to ensure that buildings stay warm in winter and cool in summer.

- We encourage LPAs to consider options for an increased uptake of renewables, whilst ensuring that measures are in place to protect and enhance the local environment and are resilient to the changing climate.

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?

Water Resources

- The baseline should include:
 - the latest Anglian Water WRMP24 evidence and its developing WRMP29 position;
 - the Water Resources East regional plan;
 - relevant Water Resource Zone (WRZ) supply-demand balances and drought resilience;
 - strategic supply scheme dependencies and delivery dates;
 - current and forecast household and non-household demand;
 - known local network constraints where available.
- The assessment should also consider cumulative growth outside Greater Norwich where it draws on the same WRZs or strategic supply system. The proposed housing uplift is material, so the baseline should not rely only on forecasts prepared before the new housing requirement. The 593 Ml/d deficit quoted in the consultation should also be clearly described as a wider regional/water-company scale figure and not as a Greater Norwich-specific deficit.

Water Quality

- Essential baseline data for Water Quality includes Dry Weather Flow data (provided by Anglian Water) and Water Framework Directive (WFD) classification data (the 2025 classification will be uploaded to Catchment Data Explorer December 2026 but is available externally here: <https://engageenvironmentagency.uk.engagementhq.com/understanding-englands-water-environment>)

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?***

Groundwater and Contaminated Land

- We are pleased to see that the updated growth strategy intends to maximise brownfield development. This is a sustainable approach which provides an opportunity for environmental improvement via remediation. The Local Authority is responsible for identifying and inspecting potential contaminated land sites in their area. We note in the Evidence section that the Densification and Brownfield Opportunities plus Townscapes Study is scheduled for early 2027.

- As noted in paragraph 35, brownfield development can present challenges in relation to ground conditions and contamination. The Plan should protect people and the environment by tackling land contamination and water pollution through a risk-based approach to defining contaminated land by identifying the source-pathway-receptor (contaminant linkages). Proposals should be accompanied by Preliminary Risk Assessments and refer to the Land Contamination Risk Management (LCRM) framework guidance: <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>
- Where possible, the Plan should steer potentially polluting development away from the most sensitive areas (i.e. SPZs and drinking water supplies) in order to avoid pollution of the water environment.

Ecology and Biodiversity

- It should be noted that brownfield sites can be valuable for both ecology and to the local community and their retention should not necessarily be seen as a barrier to growth.
- Some brownfield sites are exceptionally rich in wildlife, with abandoned buildings often providing habitat for bats, unmanaged open areas including spoil heaps, broken bricks and concrete providing nutrient poor soils for a variety of flora (often sparsely spread), and bare soils and cracks in sealed surfaces potentially allowing regrowth of scrub. All of these features can benefit a wide variety of wildlife, including birds, invertebrates, reptiles, and amphibians.
- It may be necessary to replicate such habitats while redeveloping brownfield sites, for example through the use of brown roofs, bat boxes etc.
- It is therefore important that any development on or directly adjacent to such sites is supported by a thorough environmental assessment.

Water Resources

- From a water resources perspective, brownfield development can be supported where sustainable potable water supply can be demonstrated. It is important to note that the presence of an existing water main should not be treated as evidence of spare water resource or network capacity.
- The updated Growth Strategy should favour development which minimises potable demand through high water efficiency and which can be supplied in step with planned water-resource and network infrastructure. For larger schemes and new settlements, early water-company engagement should be built into masterplanning so that water supply is considered at the same time as layout, phasing and other infrastructure.

Water Quality

- The Plan should look to locate growth around where there is existing waste water treatment capacity (following consultation with Anglian Water and Dry Weather Flow data) or where there are planned improvements like growth schemes or AMP8 schemes. Phasing should be planned to coincide with the

completion dates of improvement works to ensure there is adequate 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?

Flood Risk

- From a Fluvial and Tidal flood risk perspective, the Plan must be clear on the types of development that could be permitted in areas of flood risk and the level of required mitigation.
- The sequential test must be applied to avoid inappropriate development in areas at risk of flooding by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- The Plan should look to reduce the causes and impacts of flooding through new development, e.g. natural flood management techniques, use of SuDS, infrastructure improvement.
- The Plan can ensure SuDS schemes are acceptable by including guidance that refers to <https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems>, CIRIA C753, and our Groundwater Protection Position Statements (<https://www.gov.uk/government/publications/groundwater-protection-position-statements>). For example, the use of infiltration SuDS is not appropriate on all sites and in all locations.
- The Plan can help developers to bring forward proposals that are much more likely to be acceptable by being clear on the requirements for different development types in areas at flood risk. Development proposals should avoid, control, manage and mitigate flood risk.
- Careful consideration must be given to existing flood defence assets, including their current suitability and whether they are funded adequately to maintain the required level of protection for future development.
- An updated Strategic Flood Risk Assessment (SFRA) will be essential to inform the location and nature of development across the area.

Ecology and Biodiversity

- Where sites include existing watercourses, a riparian corridor should be retained, with no significant development (e.g. a housing estate) undertaken within 8m of a main river. Opportunities should be taken to enhance existing ecological features and to link habitats. All development must ensure that watercourses are protected from pollution during and after construction.

Regulated Sites

- The Plan should ensure that proposals in proximity to regulated sites are appropriate. We encourage you to develop a site allocation methodology that steers new housing sites away from higher risk waste facilities. This approach should be supported through both the Plan's evidence base and in the site allocation methodology.

Water Resources and Water Quality

- We do not recommend identifying particular areas for additional growth on water resources or quality grounds at this scoping stage. A Level 1 and Level 2 Water Cycle Study (WCS) should test the different spatial growth options against WRZ-level resource availability, local network capacity, strategic scheme delivery and climate/drought resilience.
- Where new or reinforced infrastructure is needed, the phasing of development should be aligned with the point at which that infrastructure can reliably be available. This evidence should inform site selection rather than water supply being left only to the planning application stage.

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

Water Resources and Water Quality

- We do not suggest a change to the settlement hierarchy solely on water resources or quality grounds at this stage. However, water resource, water supply and foul drainage infrastructure constraints should be an explicit criterion when testing the hierarchy and distribution of growth.
- Higher-order settlements should not automatically be assumed to have greater spare water-supply or water treatment capacity, and dispersed growth may also create cumulative network and resource pressures.
- If the WCS identifies material differences between growth locations, these should be reflected in the final spatial strategy and phasing.

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

Water Resources and Water Quality

- The Infrastructure section currently refers to the WCS mainly in relation to WWTW improvements. The WCS should be clearly described as covering the full water cycle, additionally including potable water resources, supply-demand balance, network capacity, water efficiency and infrastructure/phasing.
- The Plan should support and, where necessary, safeguard strategic water-supply infrastructure identified through Water Resource Management Plan/regional planning evidence, including reservoirs, transfers or other options where relevant.

Ecology and Biodiversity

- Consideration should be given to ecology and biodiversity when designing roads and paths in order to avoid habitat loss, fragmentation and disturbance to sensitive habitats and species. We recommend early consultation with the Environment Agency and other relevant bodies (such as Natural England) for proposals for the location of roads and public paths where these routes may impact sensitive sites, habitats and/or species.
- Any proposed new highways or changes to highways should incorporate pollution control structures that are suitably designed, maintained and adopted in order to minimise the pollution risks.

Question 16 - How should the GNL 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?***

Water Quality

- The proposed WCS will be essential in assessing wastewater treatment capacity and nutrient neutrality. It is vital that the WCS is carried out early in the process so that it can inform the Plan and site allocations.
- Planning site allocations and phasing timelines around existing planned improvements (Anglian Water's Drainage and Wastewater Management Plan (DWMP), AMP8, and growth schemes) will help ensure capacity is available. We recommend liaising with Natural England around nutrient neutrality.
- As well as capacity at WWTW, the Plan should also consider and seek to mitigate issues surrounding rural sewage disposal methods, e.g. septic tanks, private sewage treatment plants etc. Private Sewage treatment plants should discharge to land rather than watercourses if a percolation test and land area are deemed appropriate, to improve water quality and help with the recharge of aquifers. This could be considered as an extra stage in the existing sewage hierarchy.
- For development where mains foul drainage is proposed, consideration should be given to ensuring the site is located within an area where a mains connection is available before granting permission.

Flood Risk

- Consideration must be given to the potential increase in flood risk to critical infrastructure due to climate change, and any associated reduction in the level of protection provided by existing flood defence assets.

Water Resources

- Although the question is mainly framed around accessibility, wastewater and energy, potable water supply should also be treated as critical enabling

infrastructure. The GNLP 2045 should require water-resource and local network infrastructure to be planned and delivered in step with growth. The WCS and Infrastructure Delivery Plan should identify strategic and local water-supply dependencies, likely delivery timescales, phasing triggers and responsibilities, and should distinguish between strategic water-resource availability and local distribution-network capacity. Where a site depends on future strategic schemes or reinforcement, this should be transparent in the Plan and reflected in phasing.

- The Plan should distinguish strategic water-resource availability from local water-network capacity. A connection to the network does not by itself demonstrate that the required resource or reinforcement is available at the time development is occupied.
- The new Plan should require monitoring of both the water-efficiency standard achieved in new development and progress/delivery of strategic water-supply infrastructure that the growth strategy depends on.

Groundwater Protection

- Regarding clean power and net zero objectives:
 - We anticipate an increased number of ground source heat pumps installed as lower carbon alternatives. The Environment Agency regulates ground source heating and cooling systems. The system may require an abstraction licence and an environmental permit, or exemptions may apply. Developers should engage with us at an early stage.
 - Ground source heat pumps change the temperature in the ground and the water environment which could have impacts on the water quality or aquatic ecology. There are additional environmental risks to consider such as the impact of drilling during installation or potential leakage of fluid. Risks need to be appropriately assessed and mitigated. We recommend the following guidance be referenced:
<https://www.gov.uk/guidance/closed-loop-ground-source-heating-and-cooling-systems-when-you-need-a-permit> and <https://www.gov.uk/guidance/open-loop-heat-pump-systems-permits-consents-and-licences>.
 - An increase of Battery Energy Storage System (BESS) developments is likely. Applicants should consider whether BESS battery containers should be located away from vulnerable receptors to reduce associated environmental risks, as well as proposing appropriate measures to manage activities. There is potential for pollution of the water environment due to abnormal and emergency situations at BESS developments, in particular fires. There is a risk that highly polluting chemicals in batteries could enter groundwater in firewater or rainfall. This would be exacerbated if in a vulnerable groundwater location.
- The Plan should ensure adequate cemetery provision is addressed, with reference to Cemeteries and burials: groundwater risk assessments (<https://www.gov.uk/guidance/cemeteries-and-burials-groundwater-risk>)

[assessments](https://www.gov.uk/government/publications/groundwater-protection-position-statements)) and our Groundwater Protection Position Statements (<https://www.gov.uk/government/publications/groundwater-protection-position-statements>).

Climate Change

- Nature Based Solutions are a key component in the delivery of Net Zero and policy should be carefully considered to ensure maximum use of this type of intervention.

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?***

Water Resources

- We strongly support the GNLP 2045 setting the most demanding locally justified water-efficiency standards. Greater Norwich is in an area of serious water stress, and the Shared Standards provide an evidence base for a residential design standard of 85 litres/person/day. The policy should be expressed as a clear requirement, supported by a Water Efficient Design Statement and verification that the agreed standard has been achieved before occupation. For major non-household development, the Plan should seek the strongest practicable BREEAM water performance, including the Shared Standards approach to WAT01 and the other water categories.
- Rainwater harvesting and water reuse should be considered where appropriate but should complement rather than replace efficient fittings and demand reduction. The policy should also include measurable monitoring so that actual delivery of the water-efficiency objective can be reviewed through the Plan period.

Water Quality

- The section on Water Efficiency correctly highlights the Plan area's proximity to internationally protected water environments. Many of the rivers within the area support extensive wildlife habitats and are used regularly by boaters, SUPs, canoeists, anglers, wild swimmers etc. The Plan should therefore include extensive measures to protect and improve water quality, including development requirements.
- Increased periods of heavy rainfall can exacerbate existing sewage infrastructure issues and the resulting threats to water quality. Measures to minimise this risk should therefore be considered for both new development and existing buildings, e.g. requiring rainwater harvesting rather than mains drainage for extensions/conservatory roofs, requiring SuDS for any substantial changes to buildings where possible, requiring water butts for new development etc.

Ecology and Biodiversity

- The Plan should include the provision of green/blue infrastructure to ensure that habitats are linked where appropriate (avoiding introducing pathways for undesirable/invasive species to spread). The Plan should also identify local projects that could incorporate enhancements into developments and link sites together.
- Biodiversity Net Gain (BNG) should be a strategic objective of the Plan and site allocations should offer the potential to provide green/blue infrastructure that can deliver biodiversity benefits.
- The Plan should include the requirement for Biodiverse SuDS to maximise the onsite habitat potential.
- The Plan should help wildlife adapt to climate change through multi-functional sustainable drainage, wetland creation and restoration, targeted tree planting to increase shading to watercourses, promoting urban greenspace and protecting/developing existing and new wildlife corridors. When identifying sites for possible new green infrastructure it is important to consider the possible future impacts of climate change. This can be done by ensuring spaces are linked to improve climate resilience and planting/management regimes are reviewed in the context of extreme weather events.
- We welcome the reference to the Green Infrastructure Strategy. Development should also be guided by the Local Nature Recovery Strategy.
- We would strongly support the Plan including higher or new standards for nature recovery. For example, we would give strong support to sustainable developments which have the aspiration to meet BNG in excess of the minimum statutory targets.
- We welcome the inclusion of 'Notable species in Greater Norwich' in this section. We would like to stress the importance of these species and highlight that they are currently of conservation concern.
- Planting schemes should utilise tree species of local provenance, with the inclusion of drought-resistant species where appropriate to ensure long-term establishment, adaptability, and resilience to changing climatic conditions.
- While we broadly encourage reconnecting people with the aquatic environment, any further green/blue access within the riparian corridor should be discussed with all relevant stakeholders at the earliest opportunity. Species and habitats within the riparian zone are often sensitive to damage and disturbance.

Groundwater Protection

- The Greater Norwich area includes important groundwater resources of principal aquifers which support water supply and/or base flow on a strategic scale, and secondary aquifers of local importance. Source Protection Zones are delineated across most of the area for the protection of water supplies. These features should be recognised and safeguarded.

- Section 10 includes a section on green and blue infrastructure. The importance of SuDS has been referenced throughout this response. Appropriately located and designed infiltration features can play a key role in supporting aquifer recharge and reducing flooding.

Question 19 - Should:

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

Flood Risk

- We are pleased that new/updated SFRA have been acknowledged as a necessary requirement. You can use the Environment Agency's [detailed charged advice service](#) to request detailed advice on the preparation of an SFRA. You can also refer to our [national guidance](#) for general advice on what needs to be included.
- We recommend working collaboratively with neighbouring authorities that are working to similar timescales to produce SFRA. We would encourage you to prepare an SFRA that can be easily updated.
- The Plan should also be supported by a Sequential and Exception Test document. We note this is not currently listed among the proposed evidence studies.

Water Resources

- We support the preparation of both Level 1 and Level 2 Water Cycle Studies, but the scope should explicitly cover water resources and potable water supply as well as wastewater.
- The WCS should test whether the proposed scale and spatial distribution of growth can be supplied sustainably under current and future WRZ conditions, including dry-year/peak-demand conditions, climate change and drought resilience. It should assess the new housing uplift, non-household demand, cumulative cross-boundary growth, WRMP24/WRMP29 assumptions, strategic supply scheme delivery dates and uncertainties, local network constraints, and the effect of alternative water-efficiency scenarios. The Level 2 work should translate this into site/area-specific infrastructure and phasing requirements for the preferred growth strategy.
- Given that WRZs and strategic systems cross local authority boundaries, joint or closely coordinated work with neighbouring Norfolk authorities would be beneficial.
- The WCS should be treated as a live evidence base and updated before later Plan stages where water-company plans or growth assumptions materially change.
- We also recommend that the WCS findings are carried directly into the Infrastructure Delivery Plan and site-selection evidence.

Water Quality

- As stated above, both Level 1 and Level 2 Water Cycle Studies will be required given the issues with capacity in the LPA.
- Any WCS must include wastewater capacity assessment and baseline WFD information for each waterbody to enable effective establishment of policies that will protect the quality of the water environment. Where the WCS identifies that WWTW are likely to exceed capacity based on the growth allocated in the Plan, we would expect to see an assessment of the impact of these increased flows on the receiving water bodies. Please be aware that revised WFD classifications (2025) are now available for some waterbody elements, with an update to the publicly available Catchment Data Explorer anticipated later this year (2026). Access to currently available data can be found here:
<https://engageenvironmentagency.uk.engagementhq.com/understanding-englands-water-environment>.
- The next cycle of the River Basin Management Plan (RBMP) is due to be published in 2027. We recommend that the WCS is treated as a living document and reviewed/updated periodically throughout the Plan period to ensure the evidence base remains sound.
- The WCS will also need to include planned Anglian Water work from both the PR24 (PR29 determined in December 2029) and their DWMP.

Ecology and Biodiversity

- The [Local Nature Recovery Strategy for Norfolk](#) should be viewed as a fundamental document in the preparation of the Plan, providing important guidance and also highlighting opportunities for nature recovery.
- The Plan should refer to the RBMP to ensure proposed development considers and addresses impacts to the water environment and the wider catchment.

Groundwater Protection

- The Plan should have regard to Water Company Water Resource Management Plans and our groundwater protection hierarchy in order to protect groundwater resources.

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?

Water Resources

- Water resources should be treated as a spatial planning and deliverability issue, not only as a development-management matter. The final growth strategy should demonstrate that the timing and distribution of housing and employment growth is compatible with sustainable water-resource availability and the delivery of any required network or strategic infrastructure.

- The Plan should include measurable outcomes for water efficiency and water-supply infrastructure delivery, with monitoring and review triggers where strategic scheme timing, Water Resource Management Plan assumptions, or demand forecasts change. Early and continuing engagement with Anglian Water, Water Resources East and the Environment Agency will be important throughout Plan preparation.

Waste

- The Plan should include policies that drive waste management up the waste hierarchy.
- The Plan should consider waste management alongside other spatial planning concerns, such as housing, transport, economic growth, natural resources, energy and regeneration.
- The Plan should reduce the amount of construction and demolition waste produced during development by including policies that limit the amount of waste generated during the demolition and construction phases of development. These policies should reflect industry best practice/certification wherever possible.
- The Plan should ensure that adequate waste management is provided for in new developments through policies that provide sustainable waste management for all development types

We trust this advice is useful.

Yours faithfully



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