



# Norfolk County Council

## Norfolk County Council Comments on the: Greater Norwich Local Plan Scoping Consultation

**28 September 2026**

### **1. Preface**

1.1. Thank you for you consulting Norfolk County Council on the Greater Norwich Local Plan Scoping Consultation. The following comments represent officer-level opinion only at this stage. These comments are made without prejudice to any future representations made by Norfolk County Council in response to a consultation on the Greater Norwich Local Plan.

### **2. Strategic Planning**

2.1. Officers from Norfolk County Council have been working closely with the GNLP team to develop the GNLP, providing support for their early preparatory work under the new Local Plan making system. The Greater Norwich authorities and Norfolk County Council (NCC) have a long history of positive collaborative working, and we welcome ongoing early engagement in Greater Norwich Local Plan process.

2.2. We welcome the development of the scoping consultation (Regulation 20) detail available on the website which sets out clearly the context of the consultation in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2026 and how stakeholders can respond.

2.3. It is important that NCC are involved in all stages of the Local Plan process to ensure effective co-operation is taking place to address strategic issues, infrastructure requirements and delivery. We welcome that the scoping consultation references evidence, key trends and issues which need to be addressed in the GNLP, including in relation to matters such as housing, infrastructure funding and delivery. Continuous engagement with NCC regarding infrastructure capacity issues, such as education, libraries and transport will be important to ensure the impact of development can be appropriately addressed through the plan development.

2.4. We also note the preparation of further supporting documents to the consultation, in the form of topic papers and fact sheets on different strategic matters including the economy, environment, growth strategy, housing and infrastructure. These are helpful for stakeholders at this point in the process,

although we note the topic papers were produced before the latest National Planning Policy Framework was updated and published in August 2026.

- 2.5. We welcome that Part B “Consulting on plan-making” states that the GNLP team will use targeted emails to county council officers and members and part of their engagement. Regarding how the GNLP team engages with the NCC Strategic Planning team we wish to still be consulted via email to the Local Plan mailbox: [LocalPlan@norfolk.gov.uk](mailto:LocalPlan@norfolk.gov.uk). In addition, we note the various other communication methods to support engagement throughout the process as a partner in the GNLP, including in person and online meetings and being invited to workshops or focus groups. For wider stakeholders, using a range of different methods is likely to be necessary to ensure meaningful engagement is achieved.
- 2.6. We also welcome proposals for ongoing collaboration with NCC and other neighbouring authorities through the Norfolk Strategic Planning Member Forum.
- 2.7. When considering evidence, gathering baseline information and developing plan making proposals we would encourage continuous engagement with the relevant NCC departments to support the development of the GNLP. We welcome this has approach has already been adopted in the early stages of plan preparation, and this should remain the case throughout plan production.
- 2.8. We would note that one piece of key evidence and strategy that should be considered in the new GNLP is the Norfolk Local Nature Recovery Strategy (LNRS). This was published on 31 October 2025. As you will be aware the government states that Local Plans prepared by Local Planning Authorities must be consistent with national policy, as set out in the National Planning Policy Framework (NPPF). The latest NPPF published on 17 August 2026 addresses how Local Plans should consider the LNRS when safeguarding and enhancing the natural environment. We encourage the GNLP team to liaise with the relevant NCC department to use this as a key piece of evidence moving forward to help shape the development of the Local Plan and site allocations in line with the relevant NPPF Plan Making Policies.
- 2.9. In addition, we welcome the reference to infrastructure funding and delivery within the scoping document. In reference to question 16, you may be aware that on recent submissions on the Great Yarmouth and Breckland Local Plan, Norfolk County Council has sought to ensure that there is an effective infrastructure delivery plan, or in the words of the Planning Practice Guidance an Infrastructure Funding Statement. As part of preparing any such document, the GNLP will need to:

- assess the quality and capacity of infrastructure, and its ability to meet forecast demands. Where deficiencies are identified, policies should set out how those deficiencies will be addressed; and
- take account of the need for strategic infrastructure, including nationally significant infrastructure, within their areas.

2.10. It is also important that this document not only identifies the necessary infrastructure but also the anticipated funding from developer contributions and the choices local authorities have made about how these contributions will be used. Necessarily this is likely to need some evaluation of the relative priority of infrastructure, and how funding will be aligned to meet these priorities.

2.11. Such an approach is consistent with the guidance Plan-Making, Paragraph: 059 Reference ID: 61-059-20190315 [[Plan-making - GOV.UK](#)]. Appreciating that this relates to plan-making under the legacy system, and similar guidance does not appear to yet be reflected in the [Create or update a local plan using the new system - GOV.UK](#) guidance, this is still likely to be considered an appropriate and proportionate approach consistent with the NPPF.

2.12. We welcome reference to the Norfolk and Suffolk Energy Plan, in section 11 of the scoping document. In terms of the indicative purpose and content of the study, we would note that Data outputs of the study so far have been submitted to UKPN as part of the Local Authority Common Ask to inform infrastructure upgrades across Norfolk. In relation to the outline table, and in particular the reference to subsequent updates, we would note that any significant increases in energy need will be communicated to UKPN via their Common Ask process. The Energy Plan will also provide the evidence base to engage with NESO as part of the Regional Energy Strategic Planning (RESP) process, and to ensure that additional capacity needs at the Grid Supply Point area level needed to support growth are reflected in the broader strategic energy planning ongoing in the region.

2.13. In respect of question 6, it is important that future growth should be focused in locations that can be supported by appropriate infrastructure and where sustainable access to employment, education, healthcare and other key services can be achieved. Whilst it is possible that this could be achieved through the continued alignment of growth with the Greater Norwich urban area and main growth corridors, the scale and distribution of growth must be informed by the capacity of existing infrastructure and the ability to deliver timely improvements where constraints exist.

2.14. In this regard, a particular issue lies to the western side of Norwich, where there is a recognised gap in the strategic highway network between the A47 and A1067/Broadland Northway. The evidence currently being reviewed through the Norwich Western Link options appraisal process identifies existing congestion, journey time reliability issues, traffic reassignment onto unsuitable rural roads, rat-running through villages and wider connectivity constraints affecting communities, businesses and strategic destinations in the west and north-west of Norwich. The assessment concludes that there is a clear need for intervention to address these issues and improve network resilience and connectivity.

2.15. It is therefore likely, that significant additional growth in the western part of Greater Norwich will be dependent on the delivery of appropriate transport infrastructure. Priority should be given to improving strategic connectivity between the A47 and the Broadland Northway/A1067 corridor, including delivery of the Norwich Western Link or other interventions capable of addressing the identified transport problems. This should be complemented by investment in public transport, active travel networks, park and ride facilities, and measures that improve access to key employment locations, healthcare facilities and educational institutions.

2.16. It is important that the GNLP recognises that growth and infrastructure need to be planned together. New housing and employment allocations should only proceed where there is confidence that supporting infrastructure can be delivered in a timely manner. This includes strategic transport infrastructure, local highway improvements, public transport enhancements, walking and cycling connections, utilities, schools, healthcare provision, drainage and environmental mitigation. Failure to provide appropriate infrastructure risks exacerbating existing congestion and accessibility problems, particularly in western Greater Norwich.

2.17. Should you have any queries with the above comments please contact the Strategic Planning Team at [LocalPlan@norfolk.gov.uk](mailto:LocalPlan@norfolk.gov.uk).

### **3. Highway Authority**

3.1. The County Council as highway authority (HA) has been working in partnership with the GNLP team to develop the GNLP and the scoping consultation, so at this point there is nothing further to say.

3.2. The HA will continue to work closely with the GNLP team to develop the plan and influence its production to meet with the County Councils Transport policies, aims, and objectives.

- 3.3. Should you have any queries with the above comments please contact Richard Doleman (Principal Infrastructure Development Planner) at [richard.doleman@norfolk.gov.uk](mailto:richard.doleman@norfolk.gov.uk) or call 01603 223263.

#### **4. Children's Services**

4.1. The below education response is focused on the strategic matters that should inform the next stages of plan preparation and the development of the evidence base. From an education perspective, the GNLP 2045 should:

- Treat education infrastructure as an integral part of the growth strategy, settlement hierarchy, and assessment of reasonable spatial alternatives, rather than as a matter to be addressed only once sites are selected.
- Ensure that the scale, distribution, type, and phasing of growth are tested against existing and planned capacity across early years, mainstream primary and secondary, specialist and SEND provision, including the cumulative effect of development across school planning areas and local authority boundaries.
- Recognise that existing surplus capacity may be geographically, operationally, or temporally mismatched to new demand and should not, by itself, be taken as evidence that growth can be accommodated without additional infrastructure.
- Align the housing trajectory with realistic education delivery assumptions. This should include suitable lead-in periods for land availability, planning, funding, design, construction and opening, together with appropriate triggers and safeguards where development is phased or delivery rates change.
- Identify locations where growth could require new or expanded education provision at an early stage. Where new provision may be needed, the plan should safeguard appropriately located, accessible and deliverable land of sufficient size and quality, with flexibility for future expansion where justified.
- Assess the whole-place implications of growth, including safe and sustainable access to education, active travel and public transport, home-to-school travel pressures, community use and the relationship between new provision and existing communities.
- Maintain effective engagement with Norfolk County Council as education authority throughout plan preparation, particularly when reasonable spatial alternatives, strategic growth locations, settlement hierarchy changes, site allocations, and infrastructure policies are being considered.
- Education awaits the findings of the Housing Needs Assessment and New Settlements Study with interest. At this stage, it is not possible to comment on preferred growth locations or reach firm conclusions about individual areas until the submitted sites and reasonable spatial alternatives have been assessed against an agreed and up-to-date education evidence base. Subsequent stages of plan preparation should, however, identify areas requiring particular

educational focus where there is evidence of constrained capacity, reliance on home-to-school transport, cross-boundary demand, significant cumulative growth, or a potential need for new provision. The assessment of individual sites must also consider their proposed delivery timescales alongside the risk that existing education provision may become unsustainable over time in some parts of the plan area.

3.2 These comments are intended to provide a proportionate strategic response to the scoping consultation. Education would welcome continued involvement as the evidence base, spatial strategy, site options, and infrastructure delivery requirements are developed.

3.3 Should you have any queries with the above comments please contact Paul Harker (Place Planning Manager) at [paul.harker@norfolk.gov.uk](mailto:paul.harker@norfolk.gov.uk).

## **5. Natural Environment**

5.1. Please find below a response to the relevant scoping consultation questions from ecology.

### ***Question 16 - How should the GNLP 2045 support***

#### ***Delivery of wastewater treatment capacity and address nutrient neutrality?***

5.2. There is opportunity for the GNLP to address NN to accommodate the use of Green Infrastructure (planting trees) to compensate for nutrient load the watercourse as well as the methods proscribed by NN Credit companies such as the upgrade of septic tank provision for homes outside the sewerage network. To a lesser extent the use of Bioswale to reduce impacts from surface run off into natural watercourses.

### ***Question 17 - Should the GNLP 2045: Include higher or new standards for nature recovery and allocate sites for nature recovery or biodiversity***

5.3. The allocation of sites for Nature recovery and biodiversity enhancement can be done in line with the Local Nature Recovery Strategy (LNRS) more specifically the information from the Norwich Biodiversity Baseline Survey previously conducted.

### ***Question 17 - Should the GNLP 2045: Identify sites for enhanced green infrastructure, including Suitable Alternative Natural Greenspace, and set local green infrastructure standards?***

5.4. The Natural Environment Team would note that the LNRS displays areas of statutory protection and have made recommendations in terms of areas to create habitats to provide Suitable Alternative Natural Greenspace (SANGs) and other green infrastructure (and blue infrastructure) provision.

- 5.5. Should you have any queries with the above comments please contact the Natural Environment Team at [neti@norfolk.gov.uk](mailto:neti@norfolk.gov.uk).

## **6. Minerals and Waste**

- 6.1. Minerals and Waste have a general response to Question 22 in the Scoping Consultation Survey.

***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?***

- 6.2. The infrastructure section of the Scoping consultation document sets out that a programme of qualitative and quantitative improvements are proposed at Whitlingham Water Recycling Centre (WRC) and some smaller plants. It should be noted that there are cross-boundary matters associated with improvements to Water Recycling Centres because they are waste management developments and any planning applications for development at WRCs are therefore County Matters that will be determined by Norfolk County Council as the Waste Planning Authority.
- 6.3. Should you have any queries with the above comments please contact Caroline Jeffery (Principal Planner, Minerals and Waste Policy) at [caroline.jeffery@norfolk.gov.uk](mailto:caroline.jeffery@norfolk.gov.uk) or call 01603 222193.

## **7. Public Health**

- 7.1. Please find attached the below responses to the scoping consultation 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?***

- 7.2. 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. Suggest for weakness – access is not equal across neighbourhoods in Greater Norwich.

***A1 Developing the Vision and Objectives- 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?***

- 7.3. 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).

#### ***A2.4 Local Policy Coverage (Housing)***

7.4. 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.
- 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.

#### ***A2.4 Local Policy Coverage (Economy)***

7.5. 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.

#### ***A2.4 Local Policy Coverage (Infrastructure)***

7.6. NCC Public Health strongly supports a health in all policies approach to infrastructure planning. 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.

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

#### **A2.4 Local Policy Coverage (The Environment)**

7.8. 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.
- 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.

#### **Part B - Consulting on Plan-making**

***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?***

7.9. 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.

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

7.11. Should you have any queries with the above comments please contact the Public Health team at [phplanning@norfolk.gov.uk](mailto:phplanning@norfolk.gov.uk).

### **8. Norfolk Fire and Rescue Service**

8.1. Norfolk Fire and Rescue Service (NFRS) welcomes the opportunity to comment on the Greater Norwich Local Plan 2045 Scoping Consultation under Regulation 20. The Plan is being prepared jointly by Broadland District Council, Norwich City Council and South Norfolk Council, working with Norfolk County Council. These comments are strategic and focus on the consultation questions most relevant to fire and rescue provision.

8.2. Underpinned by statutory obligations within the Fire and Rescue Services Act 2004, the Fire and Rescue National Framework for England require fire and rescue authorities to identify and assess foreseeable fire and rescue related risks within their area and to make provision through prevention, protection and

response activity. New development can alter local risk profiles, increase population and visitor numbers, introduce new technologies and create additional demand for emergency response, fire prevention and protection activity.

8.3. Any new development places additional pressure on NFRS. Where development creates a need for fire and rescue infrastructure, equipment, facilities, vehicles, operational access arrangements, water supplies or other response capability, payment may be requested through Section 106 agreements or the Community Infrastructure Levy (CIL), where appropriate and where the relevant legal and policy tests are met.

8.4. Regarding Local Plan comments, NFRS requests that the following comments are recorded against the sections identified below.

#### **Questions 1–2: Vision, Objectives, SWOT and Baseline Evidence**

8.5. **NFRS response:** The SWOT analysis and baseline evidence should recognise emergency-service capacity, community resilience and the changing operational risk profile created by growth, climate change, new technologies and demographic change.

8.6. Additional threats and weaknesses include cumulative pressure on fire and rescue resources; congestion and constrained access routes; development in locations remote from existing response provision; increasing numbers of vulnerable residents; wildfire, flooding and extreme-weather risks; high-rise and complex buildings; and hazards associated with battery energy storage, electric vehicles, solar infrastructure, hydrogen, biomass and other emerging technologies.

8.7. The evidence base should include existing fire and rescue infrastructure and response arrangements; future population and dwelling growth; vulnerable-person and specialist-housing data; strategic and local road accessibility; firefighting water provision; major and emerging risk sites; climate-related risks; and the cumulative effect of committed and proposed development on NFRS prevention, protection and response activity.

#### **Questions 15–16: Infrastructure, Accessibility and Net Zero**

8.8. **NFRS response:** Fire and rescue provision should be identified as essential infrastructure within the Infrastructure Delivery Plan. Growth should be phased with necessary infrastructure, and the cumulative impact on NFRS resources should be assessed through infrastructure and viability work. Where

development creates additional demand or requires mitigation, contributions may be sought through Section 106 agreements or CIL where the relevant statutory tests are met.

- 8.9. NFRS supports clean power and net-zero objectives. Policies for solar photovoltaic arrays, battery energy storage systems, energy hubs, EV charging, hydrogen, biomass, anaerobic digestion and associated grid infrastructure should require early consideration of fire safety, emergency access, suitable water supplies, separation, isolation, site information, emergency plans, vegetation management, environmental protection and liaison with NFRS where appropriate.

### **Questions 17–18: Environment and Design**

- 8.10. **NFRS response:** NFRS supports water efficiency, nature recovery, green infrastructure and high-quality sustainable design. These objectives should be delivered without compromising emergency access or firefighting water availability. Landscaping, street trees, sustainable drainage, parking layouts, modal filters and traffic-calming features should be designed so that they do not obstruct or delay fire appliances.
- 8.11. Green infrastructure and nature-recovery proposals should also consider vegetation-fire risk, access for incident management and the availability of water. High-density, tall, mixed-use and heritage-sensitive development should embed fire-service access and operational needs from the earliest design stage.
- 8.12. Methods should include targeted technical workshops with infrastructure providers and emergency services, accessible online and in-person consultation, and focused engagement with residents who may be vulnerable or difficult to reach. Consultation material should explain clearly how feedback has influenced the Plan.

### **Conclusion**

- 8.13. NFRS requests that fire and rescue considerations are embedded throughout the GNLP 2045. NFRS would welcome continued engagement as the Plan progresses and as sites, infrastructure requirements and detailed policies are developed.
- 8.14. Should you have any queries with the above comments please contact Clive Denniss (Operational Risk and Policy Delivery Manager) at [clive.denniss@norfolk.gov.uk](mailto:clive.denniss@norfolk.gov.uk)

