NORWICH
City Council

Committee name: Sustainable development panel

Committee date: 10/09/2024

Report title: National Planning Policy Framework and wider policy proposals consultation response

Portfolio: Councillor Stonard, Leader of the council

Report from: Head of planning and regulatory services

Wards: All wards

OPEN PUBLIC ITEM

Purpose

To consider the proposed Norwich City Council consultation response on the National Planning Policy Framework and other changes to the planning system ahead of its submission to government.

Recommendation:

That the draft Norwich City Council consultation response in appendix 1 of this report is amended as appropriate and is then submitted to government by September 24th 2024.

Policy framework

The council has five corporate priorities, which are:

- A prosperous Norwich.
- A fairer Norwich.
- A climate responsive Norwich.
- A future-proof Norwich.
- An open and modern council.

This report addresses all five corporate priorities.

This report also indirectly addresses ‘a collaborative council’ ‘a data and insight driven and people focused council’, ‘tackle the root causes of disadvantage’, ‘empowered communities’ priorities or actions in the Corporate Plan.

Report details

Introduction

1. The government is consulting on substantial proposed changes to the National Planning Policy Framework (NPPF), along with a series of wider policy proposals in relation to increasing planning fees, local plan intervention criteria and appropriate thresholds for certain Nationally Significant Infrastructure Projects (NSIPs).

2. The proposed changes to the NPPF would have a significant impact on planning and development both locally and nationally. The proposals for increased planning fees would provide additional resource for planning. The other aspect of the consultation, government intervention in plan-making, would have a limited impact on Norwich City Council, primarily because we have a recently adopted local plan.

3. This report sets out the proposed Norwich City Council consultation responses and requests member input on any amendments which should be made to those responses prior to their submission.

4. The proposed consultation responses are in appendix 1 and are summarised in this report.

5. Our responses are strongly supportive of the great majority of the planned policy changes e.g. for design codes, grey belt/green belt, affordable housing (locally set evidence-based priorities), growing future economy sectors, promoting renewable energy and increasing planning fees to at least meet cost recovery.

6. For open questions on climate change we highlight the greater flexibility that is needed to allow more demanding water efficiency standards to be set in areas such as Geater Norwich which suffer from water stress. We also ask for quick implementation of energy efficiency measures through the Future Homes Standard, along with the promotion heat network zones.

7. A limited number of the consultation responses request that government should consider amending some of its proposed changes. These responses focus on the new methodology for assessing housing need, the proposed requirement for a 5-year housing land supply even where local plans have recently been adopted and the role of strategic planning.

Background

8. As reported to and discussed at previous Sustainable Development panel meetings, planning reform and increasing housing delivery have been high on the central government agenda for a number of years. The previous government's aim was to significantly raise housing delivery in England to 300,000 units per annum, with planning reform intended to contribute to raising delivery.

9. Policy measures introduced by the previous government which aimed at increasing housing numbers included the Housing Delivery Test and the standard method for assessing housing need.

10. However, there was a gradual watering down of policy on housing requirements set through local plans during the last parliament. This can be partly attributed to backbench pressure within parliament. At the same time, the impacts of covid also contributed to low housing delivery.

11. Figures from the Department for Levelling Up, Housing and Communities (DLUHC – see figure 3 in particular)) show that housing completion figures in England dropped steeply in the year ending September 2020 to 144,980. Completions recovered to a peak of 181,940 in the year ending June 2021 and have since fallen to 153,800 in the year ending March 2024.

12. In late 2020 the Planning White Paper (Planning for the Future) consultation was held. This encompassed a new, simplified approach to plan-making, a streamlined development management system, speeding up the delivery of development, planning for infrastructure, and delivering change.

13. Very few aspects of the Planning for the Future have been implemented, though primary legislation has been enacted through the Levelling-up and Regeneration Act 2023. This should assist the implementation of future reforms.

14. Since taking office in July 2024, the new government has made planning a priority, stating that urgent reform is needed to the planning system to drive sustained economic growth. This includes significantly increasing housebuilding nationally to deliver 1.5 million homes in this parliament (the new housing methodology covered below estimates delivery of around 370,000 homes per annum). Other priorities are driving development in the future economy sectors and ensuring that development supports an improved environment. To achieve this, government has moved extremely quickly since the general election to announce a wide range of planning reforms.

15. A policy statement issued on 8th July committed the government to doubling onshore wind energy by 2030.

16. On 17th July 2024, the King's Speech outlined legislative changes that will take place through the Planning and Infrastructure Bill to speed up and streamline the planning process to build more homes and accelerate the delivery of infrastructure. The bill will also: revise compulsory purchase compensation so that it is "fair, but not excessive" to unlock development sites; modernise planning committees; increase local planning authorities' capacity and use development to fund nature recovery.

17. The King's speech also announced the English Devolution Bill which will grant new planning powers to mayors and combined authorities, making it easier to create new combined and combined county authorities. The bill will also cover empowering locals to buy community assets.

18. Subsequently, a Policy Statement on new towns was released. The statement is short and clarifies previous announcements from government. Key points are

    - New settlements will contain at least 10,000 homes and up to 25,000 homes – they could be large-scale new communities built on greenfield land and separated from other nearby settlements, urban extensions or urban regeneration schemes.
    - A 'New Towns Code' will support high standards, including 40% affordable housing, with a focus on social rented homes.
    - A task force headed by Sir Michael Lyons and including Dame Kate Barker will advise ministers on appropriate locations for significant housing growth, delivering a shortlist of recommendations within 12 months.

19. In addition, government has made it clear that the previous government's commitment to producing national Development Management polices will be retained. Whilst definitive timescales have not been provided, civil servants have suggested that consultation is likely to take place within months, after the current consultation has been completed and changes have been made to the NPPF.

20. The previous government's intention of introducing an Infrastructure Levy has been scrapped in favour of the retaining of the Community Infrastructure Levy (CIL) and Section 106 payments to provide infrastructure funding to support development.

21. Officers intend to update the Sustainable Development panel on the progress of the above planning reforms and initiatives when more details become available.

22. The current consultation covers more immediate reforms to the NPPF and other parts of the planning system to meet the government's aim that a reformed planning system should drive sustainable economic growth.

23. The remainder of this report covers the content of the current consultation and proposed Norwich City Council consultation responses, including outlining the reasons for the proposed responses.

The Consultation

24. The consultation includes firstly a main consultation document which explains the proposed changes and contains the consultation questions, secondly a NPPF draft document which includes proposed changes to the NPPF shown in track changes, and thirdly an Outcomes spreadsheet available from the main consultation webpage which sets out the housing requirements resulting from the proposed revised method for calculating housing needs on a regional and district basis.

25. The housing requirement for Greater Norwich under the current methodology is 1,928 and the figure using the proposed method would be 2,647, which is a 37% increase (Norwich 626 to 828 (a 37% increase), Broadland 501 to 877 (a 75% increase) and South Norfolk 821 to 942 (a 15% increase)). Appendix 2

provides more details and includes equivalent figures for other Norfolk districts for information.

26. The government's main consultation document starts with introductory and policy objectives chapters. In brief, these highlight that urgent reform is needed to the planning system to drive sustained economic growth. They set out how this will be implemented, including through:

    - Making the standard method for assessing housing needs through local plans mandatory.

    - Reversing other recent changes to the NPPF to promote housing delivery.

    - Strengthening policy to promote the development of brownfield land and stating that plans should promote an uplift in density in urban areas.

    - Identifying grey belt development land within the green belt.

    - Improving "*the presumption in favour of sustainable development*" to support housing supply, by clarifying when it applies and making it clear that its use cannot justify poor quality development.

    - Delivering affordable, well-designed homes.

    - Making wider changes to ensure that local planning authorities can prioritise the types of affordable homes their communities need and that the planning system supports a more diverse housebuilding sector.

    - Supporting economic growth in key sectors, aligned with the Government's industrial strategy and future local growth plans, including laboratories, gigafactories, datacentres, digital economies and freight and logistics.

    - Delivering community needs to support society and the creation of healthy places.

    - Supporting clean energy and the environment, including through support for onshore wind and renewables.

Norwich City Council's proposed consultation responses

27. The consultation includes over 100 questions. In line with the above bullet points, these cover broad range of topic areas.

28. Based on the chapter headings in the consultation, the following table sets out key issues for Norwich City Council included in our draft response in Appendix 1. These are:

Chapter 3 - Planning for the homes we need	Questions 1 to 14 cover this chapter. Our proposed responses to questions 1 and 2 support the proposed changes which will require full housing needs to be met either within a local planning area itself or in neighbouring authorities using a standard national methodology for calculating housing requirements locally. The response to question 3 also introduces our arguments which are developed further in other consultation responses that: • Proposed changes in the consultation to meeting housing needs should be a short to medium term solution to enable urgent housing needs to be met, with a strategic planning approach addressing long term needs. • Some adaptations to the proposed methodology are suggested through our consultation response to ameliorate the outcomes for some locations and to better promote the role of large towns and cities and city regions in helping to meet national housing needs in the most sustainable locations. The response to questions 3 supports the proposed removal of the current uplift of 35% of the housing numbers for the 20 core cities in the country (Norwich is not one of these cities) but cautions that it is still important that larger towns and cities and their Functional Economic Areas (FEAs) are the major focus of housing development as they have good access to jobs and services. We highlight that this ties in with a stated aim set out in this consultation that there should be an uplift in density in urban areas. Questions 4 and 5 cover design codes. Our responses are supportive of the proposed refocusing of design codes on supporting the redevelopment of areas such as East Norwich and other large communities rather than district wide codes. Consideration is currently being given to the potential role of including design coding or guidance as part of the East Norwich masterplan/SPD. Question 7 covers the main issue which Norwich City Council, and our partners in Broadland and South Norfolk, would most like to see amended from the proposed approach. We argue that “Saved” 5-year land supplies agreed through the examinations of recently adopted local plans such as the Greater Norwich Local Plan (GNLP) should be retained. The government’s view is that local planning authorities should be able to demonstrate a 5-year land supply at all times, irrespective of a local plan having been recently adopted. We use several arguments to support our view, including that the newly proposed approach risks discouraging developers from getting involved in the local plan process and signing up to its delivery, instead focusing on speculative planning applications. Further to this, we argue that the proposed approach risks undermining the plan-led system the government is committed to promoting. We also suggest that a better approach where there is not a 5-year land supply would be to allow recently adopted plans such as the GNLP to be partially reviewed so that any increases in housing numbers that result from a change in methodologies can be addressed by the allocation of additional sites, potentially including the first stages of any new town developments. We argue that such limited reviews would stimulate the market by providing additional planned housing sites to meet additional needs resulting from higher housing requirements, whilst at the same time retaining confidence in the plan-led system rather than promoting planning by appeal.

	Questions 8 to 11 cover further detail related to the 5-year land supply. Our responses, subject to the caveats above for recently adopted local plans, are supportive. Questions 12 to 14 cover the government's intention that the whole country should have strategic as well as local plans. Our response is strongly supportive of this, favouring strategic plans at the FEA scale (such as Greater Norwich). We argue that taking account of travel to work areas and housing markets is more logical, especially in large and economically diverse counties such as Norfolk, rather than Sustainable Development Strategies (SDSs) based on whole counties. Further to this, we suggest that a strategic planning approach based on FEAs should be an option even if directly elected mayors exist. We back this argument up by saying that a collaborative approach has proved successful in Greater Norwich in recent years with two strategic plans having been adopted jointly for Broadland, Norwich and South Norfolk during the last two decades. As stated in responses to other questions in this consultation, we also suggest that in the long term a national spatial strategy could provide a high-level framework addressing national priorities around climate change, green energy, the economy and the spatial distribution of growth. It could cover key issues such as the green belt, new towns, the implications of national infrastructure for development, and the management of natural resources such as water. A national spatial strategy could also guide the development of lower tier spatial strategies, possibly including regional strategies which could provide housing targets that could help to avoid the areas of greatest constraint and direct growth to the areas with the greatest potential. Lower tier strategies based on FEAs such as Greater Norwich should be developed to plan the allocation of sites strategically.
Chapter 4 - New proposed standard method for calculation housing needs in local plans	Our responses on the proposed new standard methodology are supportive of the proposed new two-step approach based on existing housing stock and affordability as opposed to the current four-step approach based on household projections (which date from 2014). Developing the argument referred to above, we suggest that in the short term, the methodology should be amended somewhat to focus more growth on larger towns and cities and their surrounding areas. We also argue that the methodology should be altered to reduce the more extreme increases that would result, particularly for those areas experiencing limited economic growth and in migration so housing delivery of the scale envisaged would likely require significant economic stimulus from government, or which are predominantly rural so high increases would promote less sustainable patterns of development due to more limited access to services and jobs. We also argue that in the long term, as stated above, a national spatial strategy should be used to focus growth in the environmentally and economically most suitable areas of the country.

Chapter 5 - Brownfield development, the grey belt and the Green Belt	Our proposed response to question 20 is strongly supportive of the proposed amendment which reinforces the expectation that brownfield development will be viewed positively in principle. Questions 21 to 46 focus on the new proposals for the green belt. Our response to question 21 supports the proposed approach in principle. This is because the approach will help to reduce the national housing crisis by creating the new definition of the "grey belt", which will release a limited amount of land in focused and sustainably located parts of the green belt. Our response also supports the many safeguards set out in the consultation that will remain in place to ensure that the green belt continues to meet its defined purposes. As the council and our neighbours do not have a green belt, no responses are provided for questions 22 to 46.
Chapter 6 - Affordable and well-designed homes and places	Questions 47 to 50 cover affordable housing and First Homes. The responses to this section are supportive, highlighting that in Norwich there is currently a need for Social Rent homes and stating that it is important that the mix of affordable housing is based on local evidence through housing needs assessments which can be regularly updated. Our responses are also supportive of the proposed removal of the 25% First Homes requirement, stating that imposing specific housing types and targets at the national level is inconsistent with the requirement to assess and meet local housing need.
Chapter 7 – Building infrastructure to grow the economy;	Our responses are wholly supportive of the proposed changes covered by questions 62 to 66 which aim to drive development in the future economy sectors including laboratories, gigafactories (battery cell manufacturing plants), digital infrastructure and freight/logistics. Our responses include reference to the GNLP's allocation of sites for future economy sector growth, mainly at strategic employment locations in our Strategic Growth Area which forms part of the Cambridge Norwich Tech Corridor. They highlight the support this provides locally for key national sectors, particularly advanced manufacturing and engineering; agri-tech; ICT/digital creative, fintech and life sciences.
Chapter 8 Delivering Community needs;	Our responses to questions 67 to 68 are supportive of greater priority being given to the provision of key public service infrastructure such as colleges, hospitals, criminal justice facilities and post-16 and early year places. The response to question 69 supports a vision led, rather than the current "predict and provide", approach to transport planning for new development. This will involve developers working with residents, local planning authorities and transport planners to reduce the need to travel and to promote sustainable travel modes. Question 70 asks how national policy could better support local authorities in promoting healthy communities and tackling childhood obesity. Our response references policy 2 of the GNLP as a broad ranging policy which seeks to promote the sustainable design of new homes and communities. This includes promoting the use of design tools such as Building for a Healthy Life and, in some cases, Health Impact Assessments.
Chapter 9 - Supporting	The questions on onshore wind development (questions 72 and 75) cover the consenting regime for onshore wind projects. Our responses support these

green energy and the environment;	proposed changes since they would speed up delivery of small and medium sized onshore wind development proposals which would be considered by local planning authorities (LPAs). The proposed changes would require large (100 MW plus) schemes to be assessed nationally. Our response is supportive of this change, provided that timescales for national (NSIP) decision making can be reduced. Question 73 covers requiring LPAs to both allocate land for renewable and low carbon energy generation and to give significant weight to the benefits of renewable and low carbon energy generation when assessing planning applications. The council's response is supportive. Question 74 covers renewable energy development proposals in areas which are important for carbon sequestration such as peat soils. Our response says that the delivery of renewable energy projects at the expense of key carbon sequestration habitats would be counterproductive. Question 76 covers small and medium scale solar farms. Our response is supportive of increasing the threshold at which solar projects are considered to be within the NSIP regime as more projects can be considered through the less complex and quicker local decision-making process. We are supportive of the development of carbon accounting tools by government for use by LPAs and developers in our response to question 79. Questions 78 and 81 ask more open-ended questions about how national planning policy could do more to address climate change mitigation and adaptation. Our responses highlight the greater flexibility that is needed to allow more demanding water efficiency standards to be set in areas such as Geater Norwich which suffer from water stress. They also request that the Future Homes Standard on energy efficiency (all space heating and hot water demand should be met through low-carbon sources) and measures to promote heat network zones should be implemented as soon as possible.
Chapter 10 Changes to local plan intervention criteria;	Questions 87 and 88 cover government intervention when LPAs fail to produce local plans. Our response recognises that it is essential that up-to-date local plans are in place, so it is important that government intervention can take place when required. The response favours the clarity that proposed new intervention criteria would provide rather than relying on existing legal tests.
Chapter 11 - Changes to planning application fees and cost recovery for NSIPs	Our responses are supportive of the government's proposed increase in householder application fees to meet cost recovery. Responses also support an increase in fees to at least meet cost recovery for other types of planning application. We also argue that nationally set fees are preferable to them being set locally as they create more of a level playing field, and such national fees should be increased to part fund other planning services such as plan-making and enforcement.
Chapter 12 - The future of plan policy	The three questions in this section concern transitional arrangements for LPAs which are still in the process of developing their local plans. As such, they are of limited relevance to Norwich. Reiterating comments made in relation to earlier consultation questions, our responses request more detail on recently adopted

and plan making	local plans and ask that that a flexible approach should be put in place for such plans to allow for a limited review.
Chapter 13- The Public Sector Equality Duty.	Our response to the final question is short, referring to the fact that equalities duty legislation is in place. .

Conclusion

29. The Sustainable Development Panel is asked to comment on the content of the draft consultation response as summarised above and set out in appendix 1 and to recommend that it should be amended as appropriate, finalised and submitted to government prior to the deadline of 24th September.

Consultation Implications

30. The Sustainable Development panel chair and the portfolio holder/leader of the council have been made aware of the contents of this report prior to reporting to the SD Panel.

31. Discussions have taken place with our planning partners at Broadland and South Norfolk and in some cases similar consultation responses have been agreed.

Financial and resources

32. There are financial implications related to the proposals in the consultation for increasing planning fees.

Legal

33. There are no legal implications associated with this report.

Statutory considerations

Consideration	**Details of any implications and proposed measures to address:**
Equality and diversity	No impact as a result of this report.
Health, social and economic impact	No impact as a result of this report.
Crime and disorder	No impact as a result of this report.
Children and adults safeguarding	No impact as a result of this report.

Consideration	Details of any implications and proposed measures to address:
Environmental impact	No impact as a result of this report.

Risk management

Risk	Consequence	Controls required
No risks have been identified	No risks have been identified	No risks have been identified

Other options considered

34. The proposed reforms to the NPPF and some of the other reforms covered in the consultation will be critical to planning locally and nationally, so the option of not responding has been rejected.

Reasons for the decision/recommendation

35. It is important that Norwich City Council engages in the consultation to both express its support for the great majority of the proposed reforms through the consultation and to suggest alternative approaches for a limited number of specific issues.

Background papers: None

Appendices:

Appendix 1: Draft Norwich City Council NPPF consultation response (with explanatory notes which will not be submitted to government).

Appendix 2 Housing Requirements in Norfolk

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Appendix 1: Draft Norwich City Council NPPF consultation response (with explanatory notes which will not be submitted to government). Text which is proposed by government to be changed in the NPPF is shown in red italics.

Question	Proposed Response	Explanatory Notes
Chapter 3 – Planning for the Homes we need		
1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?	Norwich City Council agrees that it is important that full housing needs are met either within a local planning area itself or in neighbouring authorities. Joint planning between Broadland District Council, Norwich City Council and South Norfolk Council has helped to ensure that this can happen in Greater Norwich for over a decade.	Proposed changes remove the following red crossed through text: *The overall aim should be to meet ~~as much of~~ an area's identified housing need ~~as possible~~, including with an appropriate mix of housing types for the local community.*
2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?	Norwich City Council agrees that it is important that full housing needs are met using a standard national methodology. The previous government's gradual watering down of housing requirements set through local plans has led to a situation in which it has become increasingly difficult for the very real and urgent housing needs of our communities to be met. Norwich City Council welcomes the broad thrust of the far-reaching proposals in this consultation which aim to reverse this, so that enough homes will be built to allow people the basic right of having decent housing. Norwich City Council is of the view that the proposed changes in this consultation to meeting housing needs should be a short to medium term solution to enable urgent housing needs to be met. In the longer term, a national strategic plan, possibly supported by regional strategies and definitely supported by sub regional strategies based largely on Functional Economic Areas (FEAs) such as Greater Norwich should be developed. Some adaptations to the proposed standard methodology are suggested through this consultation response to ameliorate the outcomes for some	To complement the proposed changes above, the changes remove the red highlighted crossed through text from the glossary: ***Local housing need:*** *The number of homes identified as being needed through the application of the standard method set out in national planning guidance ~~(or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).~~*

	locations and to better promote the role of cities and city regions in helping to meet national housing needs in the most sustainable locations (see also the response to question 19). .	
3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?	Norwich City Council agrees that the current urban uplift approach should be scrapped. This is because requiring the 20 largest urban areas to provide for a 35% uplift creates overly challenging targets. This is especially the case as the largest centre in each of the 20 areas is expected to provide for that target. This approach does not reflect the reality of how urban areas work. However, the proposed significant reduction in housing numbers in many urban areas compared to the current methodology should be considered carefully. This is because a significant proportion of the homes needed nationally should be located in cities and their FEAs which have good access to jobs and services (also see the response to question 19). Since a stated aim set out in this consultation is that there should be an uplift in density in urban areas, the relative contribution of large towns and cities and their FEAs to achieving national housing delivery targets should be carefully considered.	Proposed changes remove the following red highlighted crossed through text: ~~*The standard method incorporates an uplift which applies to certain cities and urban centres, as set out in national planning guidance. This uplift should be accommodated within those cities and urban centres themselves except where there are voluntary cross boundary redistribution agreements in place, or where it would conflict with the policies in this Framework*~~ .
4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?	Norwich City Council agrees with this proposed change. Design codes should support the efficient use of land at appropriate densities for specific sites, strengthening expectations that plans should promote an uplift in density in urban areas. It is also agreed that the codes should focus on supporting the masterplanning of the redevelopment of areas of change such as East Norwich and of other large communities with the most potential for development.	Proposed changes remove the flowing red highlighted crossed through text: ~~*In applying paragraphs 129a and b above to existing urban areas, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan.*~~

5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?	The council agrees, as set out in the response to question 4 above, that the focus of design codes should be on establishing visions in local plans as well as supporting the redevelopment of areas such as East Norwich and other large communities. Such an approach would be more suitable for Norwich, rather than focussing on the production of a district wide code. District wide codes were previously intended to play a role in the intended introduction of a zonal planning system which has not been implemented.	
6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?	Agreed. Norwich City Council recognises the need to promote housing development, particularly in the short-term, in those areas which do not have an adopted plan. We agree that this should be supported through the "tilted balance", with additional wording being needed to ensure good quality development results when the "tilted balance" applies.	Proposed changes add the following red highlighted underlined text: *granting permission unless: ……..* *ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, in particular those for the location and design of development (as set out in chapters 9 and 12) and for securing affordable homes.*
7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?	Norwich City Council strongly disagrees with this proposed approach. "Saved" 5-year land supplies agreed through the examinations of recently adopted local plans should be retained. Such an approach recognises both the fact that considerable investment has been made in the formulation, examination and adoption of local plans and the importance of providing local people with greater certainty that development will take place in locations which are allocated in adopted plans and have been planned with supporting infrastructure. To consider recently adopted plans as out of date would undermine the plan-led approach which government is clearly advocating otherwise. Significant investment has taken place	This key proposed change would particularly impact on Broadland and South Norfolk. The proposed deletion of paragraph 76 which allowed us to "save" the 5-year land supply evidenced and agreed in our recent GNLP examination is one of the most significant changes for Greater Norwich resulting from proposed NPPF changes.

	in Greater Norwich in terms of resources and political and public engagement in getting to the point where the Greater Norwich Local Plan (GNLP) was adopted by three councils with different political make ups in March 2024. Amending the current approach risks leading to developers seeking to progress non adopted sites if the tilted balance applies, instead of progressing the delivery of allocated sustainable greenfield and brownfield sites with planned supporting infrastructure. This approach is likely to discourage developers from getting involved with drawing up plans and signing up to their delivery, instead focusing on speculative planning applications. Together, these likely outcomes risk undermining the plan-led system the government is committed to promoting. A better approach where there is not a 5-year land supply would be to allow recently adopted plans such as the GNLP to be partially reviewed so that any increases in housing numbers that result from a change in methodologies can be addressed by the allocation of additional sites, potentially including the first stages of new town developments. Such limited reviews would stimulate the market by providing additional planned housing sites to meet additional needs resulting from higher housing requirements, whilst at the same time retaining confidence in the plan-led system rather than promoting planning by appeal. The NPPF consultation is largely silent on adopted local plans. A recognition that such plans are the agreed strategy for local areas and that their integrity should be supported would be extremely helpful.	
8: Do you agree with our proposal to remove wording on national	Norwich City Council partially agrees with this change in that simplification of the NPPF would be helpful. However, as set out elsewhere in this consultation	The consultation proposes removing this paragraph and replacing it with simpler text requiring all areas to have a

planning guidance in paragraph 77 of the current NPPF?	response, the proposal requiring all areas to have a 5-year land supply at all times should not apply where the 5-year land supply has been “saved” through the examination into a recently adopted local plan (see response to question 7).	5-year land supply. ~~*In all other circumstances, local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide either a minimum of five years' worth of housing or a minimum of four years' worth of housing if the provisions in paragraph 226 apply. The supply should be demonstrated against either the housing requirement set out in adopted strategic policies, or against the local housing need where the strategic policies are more than five years old. Where there has been significant under delivery of housing over the previous three years the supply of specific deliverable sites should in addition include a buffer of 20% (moved forward from later in the plan period). National planning guidance provides further information on calculating the housing land supply, including the circumstances in which past shortfalls or over-supply can be addressed.*~~
9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?	Yes, a 5% buffer should apply where the requirement for a 5-year land supply remains.	
10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?	Yes, where the requirement for a 5-year land supply remains.	

11: Do you agree with the removal of policy on Annual Position Statements?	Yes, as they were very rarely used.	
12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?	Yes. Norwich City Council has long argued for a greater role for strategic planning and strongly agrees that effective co-operation on cross boundary and strategic planning matters is essential for good planning. This particularly applies to meeting housing needs, delivering strategic infrastructure, and building economic and climate resilience. Norwich City Council welcomes the proposed focus of strategic planning on FEAs. Although county or similar scale strategic planning where there is an elected mayor through Sustainable Development Strategies (SDSs) could be effective, it is felt that FEAs, most likely based on housing markets or travel to work areas, better represent economic reality and thus are the most appropriate geographical areas for sub-regional strategic planning (see the response to question 14 which also covers national and regional spatial planning for more details).	
13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?	The tests of soundness should be amended enable long-term strategic planning to take place. Norwich City Council agrees that it is important that the tests take account of the fact that strategic plans require implementation over a long period, making it more difficult to provide evidence of deliverability and viability. Detailed evidence of deliverability and viability is best provided on a site by site basis at the local plan level.	
14: Do you have any other suggestions relating to the	Strategic planning based on FEAs taking account of travel to work areas and housing markets is more logical, especially in large and economically diverse counties such as Norfolk, rather	

proposals in this chapter?	than Sustainable Development Strategies (SDSs) based on whole counties. A strategic planning approach based on FEAs should be an option even if directly elected mayors exist. Such an approach has proved successful in Greater Norwich in recent years with two strategic plans having been adopted jointly for Broadland, Norwich and South Norfolk during the last two decades. These three districts broadly represent the FEA for Norwich, though there could be an argument for extending the FEA to include those parts of neighbouring authorities which are within the housing market and/or travel to work area of Norwich. Within Norfolk, housing market and travel to work evidence show that Great Yarmouth and King's Lynn and West Norfolk in particular form distinctly different housing and economic areas to Greater Norwich and have different needs. County wide, the Norfolk Strategic Planning Framework (NSPF) has provided the required non-statutory co-ordination to ensure strategic matters have been addressed for almost a decade so that the duty to cooperate has been met. The NSPF consists of a number of agreements which focus on planning for infrastructure needs, and has included the LPAs agreeing to meet their housing needs within their own areas. The NSPF has also assisted in ensuring a coordinated approach to addressing environmental constraints such as Habitats Regulations Assessment (HRA) issues through local plans. Such informal agreements could play a role in coordinating strategic plan production based on FEAs. Norwich City Council feels that such an approach would be better than returning to a county wide Structure Plan type approach. As stated in responses to other	

	questions in this consultation, it is also felt that a national spatial strategy could provide a high-level framework addressing national priorities around climate change, green energy, the economy and the spatial distribution of growth. It could cover key issues such as the green belt, new towns, the implications of national infrastructure for development, and the management of natural resources such as water. A national spatial strategy could also guide the development of lower tier spatial strategies, possibly including regional strategies which could provide housing targets that could help to avoid the areas of greatest constraint and direct growth to the areas with the greatest potential. Lower tier strategies based on FEAs such as Greater Norwich should be developed to plan the allocation of sites strategically.	
Chapter 4 – A new Standard Method for assessing housing needs		
15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?	Yes. The current approach relies on household projections which are subject to regular change, making long-term planning through a local plan difficult. Furthermore, projections don't take sufficient account of "hidden households", especially in less affordable areas. The proposed approach is also broadly supported because it is simpler, would help to achieve national housing targets, would raise targets in the least affordable areas and would distribute growth more evenly across the country. However, this approach should be refined somewhat to ameliorate the proposed outcomes for a limited number of areas (see response to question 19).	

16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?	Yes, the workplace-based median house price to median earnings ratio is the most meaningful way of comparing housing affordability in different areas. Linking it to the last three years' figures allows changes over time to be reflected. However, this approach should be somewhat refined (see response to question 19).	
17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?	Yes, because the proposed method includes a multiplier which will increase the importance of housing affordability in assessing needs. This will direct more homes to where they are most needed. However, this approach should be somewhat refined (see response to question 19).	
18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?	In principle, it would be helpful to include rental affordability in the calculations, but this should be weighed up against increasing the complexity of the methodology.	
19: Do you have any additional comments on the proposed method for assessing housing needs?	Norwich City Council welcomes the proposed increase in the number of homes for the country as a whole from the current methodology's outcome of 306,500 homes to 370,000 homes under the proposed new methodology, a 20% increase. The NPPF consultation document emphasises that the proposed methodology would both spread housing growth more evenly across the country and would maximise delivery in urban areas, focussing 30% of the growth in	

	housing requirements across Mayoral Combined Authorities. Norwich City Council agrees that growth in larger urban areas such as the defined largest 20 core cities and other large towns and cities will increase agglomeration benefits. It is agreed that this will increase the contribution new housing makes to economic growth and that this approach will make the most of our transport hubs, also supporting the objectives of brownfield-first. However, under the proposed methodology, 24 of the 33 London boroughs, and some cities, would see their housing need decrease significantly, with some, such as Tower Hamlets and Leicester, falling by around 50%. A number of cities have formed the Key Cities group. The new methodology increases the targets by 22.6% in the Key Cities. The majority of the cities would have an increase of between 0 and 50% through the new methodology. However, there is a significant discrepancy between how some cities would be affected. For example, the proposed formula would see small falls in Bradford, Medway and Southampton, with Coventry's housing need falling by 50%, whilst that of Bath and NE Somerset, Doncaster, Preston and Sunderland would all rise by over 100%, with Blackpool rising by 328% and Cumberland by 398%. As set out in responses to questions 15 to 17, Norwich City Council broadly supports the proposed method's allocation of numbers in proportion to an area's existing housing stock rather than on household forecasts and supports giving more weight to affordability. However, this approach should be	

	refined somewhat to ameliorate the outcomes for some areas. Norwich City Council regards there as being potential to increase the role of both the core cities and other large urban areas and their FEAs. At the same time, the opportunity should be taken to iron out some of the discrepancies between the additional growth that would be required in some predominantly rural areas, along with areas currently with a weak housing market, that are a feature of the proposed new methodology. Examples include: • Current housing market cold spots, such as Redcar and Cleveland, Burnley and Hyndburn, where proposed increases would be by over 500% from the current methodology. This would lead to land for housing having to be released in areas where the population is static or declining, due to a relatively elderly population and low levels of in-migration. Whilst this approach could be argued to have a regeneration focus, it will likely require significant economic stimulus from government as homes may not be provided if there is limited market interest. This potentially risks both achieving national targets and placing a burden on areas where the absorption rate of the local housing market would be unlikely to allow for the scale of growth envisaged. • Some predominantly rural areas such as North Yorkshire, Northumberland and Staffordshire Moorlands which would see rises of over 200%, whilst within Norfolk growth of 88% is envisaged for King's Lynn and West Norfolk. Such areas have more limited access to services and facilities, so significant	

	growth here could lead to less sustainable patterns of development, most likely with increased travel by the private car. Such an approach would contrast with a main thrust of the NPPF which is make travel patterns more sustainable. Paragraph 109 of the current NPPF, which is not proposed to be changed, makes this clear, stating *"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes".* Thus, a strategically led planning system should focus the majority of growth in areas which have existing services and where such growth would not lead to major increases in the need to travel, particularly by the private car. The focus of growth should be placed more on the nation's cities and on city regions. **Suggested changes to outcomes:** It is therefore suggested that in the short term, the methodology should be amended to focus more growth on larger towns and cities and their surrounding areas, whilst reducing extreme increases, particularly in those areas experiencing limited in migration, or which are predominantly rural. In the long term, as stated in the response to question 14 of this consultation, a national spatial strategy should be used to focus growth in the environmentally and economically most suitable areas of the country. This would provide a highly important framework for the future development of lower tier spatial strategies.	

Chapter 5 Brownfield, grey belt and the Green Belt		
20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?	Norwich City Council strongly agrees that the default answer to brownfield development should be yes, whilst also recognising that brownfield development alone will not be enough to meet the nation's housing needs. It therefore supports this proposed amendment which reinforces the expectation that brownfield development will be viewed positively in principle.	Proposed changes add the following red highlighted underlined text: Planning policies and decisions should: ……. c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, *proposals for which should be regarded as acceptable in principle,* and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;
21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?	Norwich City Council strongly supports the proposed approach to promote the development of brownfield land in the green belt, along with wider measures set out in this chapter. This is because they will help to reduce the national housing crisis by creating the new definition of the "grey belt". This will release a limited amount of land in focused and sustainably located parts of the green belt which make a limited contribution to the five defined green belt purposes. Norwich City Council also supports the many safeguards set out in the consultation that will remain in place to ensure that the green belt continues to meet its defined purposes. As the council and its neighbours do not have a green belt, no responses are provided for questions 22 to 46 (the questions are consequently not included in this appendix, but are available in the consultation document).	

Chapter 6 Delivering affordable, well-designed homes and places		
47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?	Yes – within Norwich there is currently a need for Social Rent homes so we support the specific inclusion of this within the NPPF. It is however important that the mix of affordable housing is based on local housing needs assessments. Need can change over time so should be based on Local Authorities' most up to date evidence.	To support the objectives around boosting delivery of Social Rent while leaving local planning authorities in the driving seat, it is proposed to set **an expectation that housing needs assessments explicitly consider the needs of those requiring Social Rent and that authorities specify their expectations on Social Rent delivery as part of broader affordable housing policies.** It is expected that many areas will give priority to Social Rent in the affordable housing mix they seek, in line with their local needs, and this is something the government strongly supports. However, it is not proposed to be prescriptive; it is for local leaders to determine the balance that meets the needs of their communities.
48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?	Yes – there is very little need in Norwich for affordable home ownership, shared ownership and shared equity products. Tenure should be determined locally and should be based on housing need. Need can change over time so should be based on local authorities' most up to date evidence.	Currently, home ownership products are prioritised over homes for affordable rent, with particular priority given to First Homes. It is proposed to remove the requirement to deliver at least 10% of the total number of homes on major sites as affordable homes ownership.
49: Do you agree with removing the minimum 25% First Homes requirement?	Yes - there is very little need in Norwich for affordable home ownership, shared ownership and shared equity products. The 25% First Homes requirement demonstrates why policy prescription is incompatible with meeting identified local housing need. Imposing specific housing types and targets at a national	First Homes would however remain a type of affordable housing and an option for delivery where local planning authorities judge this to be appropriate for local needs.

	level is inconsistent with the requirement to assess and meet local housing need.	
50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?	No further comment – as an urban authority, Norwich City Council does not use the exception policy	
51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?	Norwich City Council has no objection to the introduction of this policy. However, national planning policy must also make it clear that tenure, as well as housing designed for specific groups (such as older people's housing and student accommodation), must be determined locally and should be based on housing need. Need can change over time so should be based on local authorities' most up to date evidence.	Mixed tenure sites can provide a range of benefits including creating diverse communities and supporting timely build out rates and local planning authorities should support their development through their policies and decisions. Mixed tenure sites can include a mixture of ownership and rental tenures, including rented affordable housing and build to rent, as well as housing designed for specific groups such as older people's housing and student accommodation, and plots sold for custom or self-build.
52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?	The council has significant experience of using its own land holdings to deliver high percentages of affordable housing, both through direct delivery and in partnership with Registered Providers. Recent examples include Three Score (a care home and around 125 affordable homes as part of a wider urban extension), the Norwich Orwell Partnership (over 200 affordable homes on small scale sites over a period of years) and the Stirling Prize winning 93 affordable homes at Goldsmith Street.	Whilst seeking to promote a mix of tenures on developments, the government also acknowledge that there will be circumstances where developments that are predominately (or exclusively) single tenure will be appropriate and should be supported. In particular, the government wants to make it clear that development that delivers a high percentage of Social Rent (or other affordable housing tenures) should be supported.

53: What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?	We always consider the wider existing community and plan on a site-by-site basis to ensure balanced and mixed tenures are delivered in an area. As a result, in our experience, thresholds are not necessary.	The government have however set out that they acknowledge that predominately or exclusively affordable housing developments can raise concerns, given evidence around the benefits of mixed communities. They are therefore seeking views on how to best promote sites of this type, while ensuring that adequate safeguards are in place that avoid unintended consequences (for example whether there is an appropriate maximum size for schemes of this nature).
54: What measures should we consider to better support and increase rural affordable housing?	No comment – Norwich is an urban authority.	
55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?	Norwich City Council supports these changes.	In order to ensure an appropriate amount and type of accommodation is provided for looked after children it is proposed to include a reference to this in the NPPF to ensure that the housing need of this group is assessed and reflected in planning policies. Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing *(including Social Rent)*; families with children; *looked after children*; older people (including those who require retirement housing, housing-

		with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.
56: Do you agree with these changes?	Norwich City Council has had some experience of community-led developments and co-housing and these are something that we would support in principle. The planning merits would however need to be considered on a case-by-case basis.	Community-led housing is delivered by community land trusts, housing co-operatives and other community-based groups seeking to help meet local housing need and is often able to provide housing on sites that are unavailable to mainstream commercial housebuilders or are commercially unattractive. Through the 2023 review of the NPPF, a number of amendments were made to enable planning authorities to support community-led housing. It is proposed to strength these by: a. including within the definition of 'community-led development' housing that is developed by a group originally set up for a purpose other than housebuilding; and b. removing the size limit for community-led exception sites, where an alternative limit is established through the development plan.
57: Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes	Norwich City Council does not agree with amending the definition of affordable housing for rent. To ensure that affordable housing is well managed, is truly affordable and remains affordable in perpetuity it needs to be taken on by registered providers or charities. It should however be made easier for community groups to become registered providers or charities.	The government is seeking views on whether changes are needed to the definition of 'affordable housing for rent' in the Framework glossary to make it easier for organisations that are not Registered Providers, for example community-led developers and almshouses,

would you recommend?		to develop new affordable homes.
58: Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?	Within the urban area of Norwich, much of our housing delivery is on sites smaller than one hectare and we acknowledge and support the important contribution that small and medium sizes have towards meeting our housing requirement. Norwich City Council allocates small sites and supports the development of appropriate windfall sites. There has not been the need to use tools such as Local Development Orders and we consider that the existing policy approach is relatively effective. However, we have found that small urban sites do not often deliver high levels of affordable housing either due to them not meeting the threshold for affordable housing or due to them having constraints that mean that development costs are high which affects the viability of the site. Notwithstanding this, Norwich City Council has itself delivered several 100% affordable housing schemes on small brownfield sites within the city. The policy could be strengthened by reforming the approach taken to exceptions sites for affordable housing.	The government are seeking views on why authorities are unable to identify enough small sites to reach the current 10% NPPF local plan allocation expectation and are welcoming views on measures to strengthen small site policy through the NPPF.
59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?	Yes. Norwich City Council agrees with removing references to beauty and beautiful. There needs to be a strong focus on design quality, but the concept of 'beauty' is a highly subjective. We feel that there should be more of an emphasis on the term 'placemaking'. When considering the principle of good design, this needs to respond to the local environment as what works in one setting may not be appropriate in another. Good design cannot also just consider the appearance of something. It is about enhancing an area, improving biodiversity, creating healthy places, being climate resilient, decarbonising, having connectivity and ensuring	The government propose to **reverse the changes made in 2023 to the Framework that reference beauty and beautiful in relation to well-designed development**. **They also propose to make small amendments to the changes made in 2023 to paragraph 138 of the existing Framework** to clarify the original intention for this wording to reflect that the National Model Design

	meaningful local community and stakeholder involvement. We agree that the National Model Design Code along with any local design codes should be the primary means of assessing and improving the design of development.	Code is now in widespread use and that the NMDC or where available local design guides and codes, prepared in line with the national guidance, is the primary means of assessing and improving the design of development.
60: Do you agree with proposed changes to policy for upwards extensions?	Norwich City Council would prefer it if references to mansard roofs in the NPPF were removed altogether. Norwich benefits from a wide variety of roof forms, with mansard roofs being a minority in that variety. In some instances, a mansard roof would be appropriate and in other cases it would have a significantly detrimental impact upon the streetscene and the wider conservation area. Upward extensions should be considered on their own merits and the concern is that by retaining the reference to mansard roofs within the policy wording it could make it harder to resist inappropriate development. Removing the reference to mansard roofs altogether would not preclude them (as they are a form of upward extension) and it would be better to address specific issues such as mansard roofs within local design codes or guides.	Paragraph 124(e) of the Framework was updated in 2023 to include detailed wording to encourage the development of mansard roofs as an appropriate form of upward extension, to recognise their value in delivering urban intensification where appropriate. Whilst the government is in favour of such schemes, they feel that the current wording places a disproportionate emphasis on one type of upwards extension development. To make clear that national policy is strongly supportive of all upward extensions, including mansard roofs, they are proposing to refer explicitly to mansard roofs within paragraph 124(e) as one appropriate form of upwards extension that national policy supports. The government also propose to retain and amend current policy to ensure that a condition of simultaneous development should not be imposed on an application for multiple upward extensions of any type unless there is an exceptional justification, to generate the same level of support for upwards

		extensions for other schemes that it has for mansard roofs.
61: Do you have any other suggestions relating to the proposals in this chapter?	No comment	
Chapter 7 Building infrastructure to grow the economy		
62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?	Norwich City Council welcomes these proposed changes to the NPPF. The Greater Norwich Local Plan has allocated sites for economic growth, mainly at strategic employment locations in its Strategic Growth Area which forms part of the Cambridge Norwich Tech Corridor. This will support growth of key national sectors, particularly advanced manufacturing and engineering; agri-tech; ICT/digital creative, fintech and life sciences, along with improvements to supporting infrastructure.	The proposed changes aim to drive development in the future economy sectors including laboratories, gigafactories (battery cell manufacturing plants), digital infrastructure and freight/logistics. The proposed changes are intended to create a positive expectation that suitable sites for these types of modern economy uses are identified in local plans. This includes support for the development of knowledge, creative, high technology and data-driven sectors, by giving more explicit recognition of the need to support proposals for new or upgraded facilities and infrastructure (including data centres and electricity network grid connections).The changes also include support for other growth sectors which are of local, regional and national importance which have not been specifically named.
63: Are there other sectors you think need particular support via these changes? What are they and why?	No, paragraph 87c which includes support for other growth sectors which are of local, regional and national importance which have not been specifically named is welcomed. This both allows for support for local economic strength and for flexibility as	See notes above.

	economic priorities change over time.	
64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?	Yes, this is a suitable approach for large scale schemes of national significance.	
65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?	A minimum scale would be appropriate so that only nationally significant projects are assessed through the NSIP process.	
66: Do you have any other suggestions relating to the proposals in this chapter?	No further suggestions.	
Chapter 8 Delivering community needs		
67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?	Yes, Norwich City Council agrees that greater priority should be given to the provision of key public service infrastructure such as colleges, hospitals and criminal justice facilities.	In recognition of the need to improve key public services infrastructure such as further education colleges, hospitals and criminal justice facilities, the consultation proposes adding wording to make clear that significant weight should be placed on the importance of facilitating new, expanded, or upgraded public service infrastructure when considering proposals for development.
68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?	Yes, Norwich City Council agrees that greater priority should be given to the provision of post-16 and early year places.	Proposed revisions to paragraph 99 reference post-16 and childcare places to support the Government's wider commitment to such improving such facilities.

69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?	Yes, Norwich City Council supports a vision led approach, as opposed to a "predict and provide approach", to transport planning for new development to reduce the need to travel and to promote sustainable travel modes. The council is keen to work with developers, Norfolk County Council and residents to achieve this.	Proposed changes seek to promote a "vision led" approach promoting sustainable transport modes for new developments, involving developers working with residents, LPAs and transport planners. This is intended to replace the current "predict and provide" approach, thus challenging the default assumption of automatic traffic growth.
70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?	More direct references to an integrated approach which includes the use of design tools such as Building for a Healthy Life and/or Health Impact Assessment would be helpful. Such an approach is taken in policy 2 of the GNLP. This is a broad ranging policy which seeks to promote the sustainable design of new homes and communities. This includes promoting the use of Building for a Healthy Life and, in some cases, Health Impact Assessments.	
71: Do you have any other suggestions relating to the proposals in this chapter?	No further suggestions.	
Chapter 9 Supporting green energy and the environment		
72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?	Norwich City Council agrees in principle that large onshore wind projects of 100 MW plus should be reintegrated into the NSIP regime. The reason for this is that large onshore wind projects would be consistent with other projects included within the NSIP regime and are usually schemes of national importance. However, we are concerned about the speed of decision making in the NSIP regime and the impact this could have on the timely delivery of onshore wind and other NSIP projects. A recent House of Commons report showed that the time for a decision to be made on an NSIP has increased from 2.6 years in	This type of project appears to be similar to those already covered by the NSIP regime in part 3 of the Planning Act 2008. Offshore generating stations with a capacity of more than 100 megawatts (MW) and onshore solar generating stations with a capacity of more than 50MW are classed as NSIPs. The NSIP regime applies to "major infrastructure projects" and large onshore wind would fit within this definition.

	2012 to 4.2 years in 2021. Although there are actions published in the February 2023 action plan to speed up the decision making process for NSIPs, we are concerned these changes are yet to be effective. Therefore, there is a concern that reintegration of onshore wind into the NSIP programme will see these types of applications take a significant period of time to be determined and delivered. We would support whichever method would get renewable and low carbon energy projects through the consenting process in the most efficient way.	
73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?	Norwich City Council supports the proposed amendments to the NPPF as they would require LPAs to both allocate land for renewable and low carbon energy generation and to give significant weight to the benefits associated with renewable and low carbon energy generation in assessing planning applications.	Proposed amendments to paragraph 160 state local plans should identify land suitable for these types of project which would give certainty for where this type of development would be acceptable. Proposed amendments to existing paragraph 164 would direct decision makers to, and proposals' contribution to meeting a net zero future.
74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?	Norwich City Council agrees that peat soils should be considered unsuitable for renewable energy development, as should Grade 1 agricultural land. A key NPPF aim is to reduce and adapt to the effects of climate change (proposed paragraph 158). Although renewable and low carbon energy generation is one way of achieving this, delivery of those projects at the expense of key carbon sequestration habitats would be counterproductive in relation to the NPPF's climate change aims.	
75: Do you agree that the threshold at which	Norwich City Council supports this proposed change since it would speed up delivery of small and medium sized	The consultation document sets out anecdotal evidence that renewable energy

onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?	onshore wind developments. The threshold at which offshore wind is deemed “large” and therefore part of the NSIP regime is 100 MW (The Planning Act 2008). Setting the same threshold for onshore wind seems sensible and proportionate.	generation projects are being stymied by the current lower thresholds as industry actors want to avoid the costly and time consuming NSIP process (see also answer to Q72). Therefore, increasing the threshold at which onshore wind is considered to be within the NSIP regime means more projects can be considered through the less complex planning process.
76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?	Norwich City Council supports this proposed change since it would speed up delivery of small and medium sized solar farm developments.	The consultation document sets out anecdotal evidence that renewable energy generation projects are being stymied by the current lower thresholds as industry actors want to avoid the costly and time consuming NSIP process (see also answer to Q72). Therefore, increasing the threshold at which solar projects are considered to be within the NSIP regime means more projects can be considered through the less complex planning process.
77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?	N/A	N/A
78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?	National planning policy could allow more demanding water efficiency standards, including water neutrality where required, to be set through local plan policies using more demanding standards which should be set in the Building Regulations. National policy should also ensure that the Future Homes Standard and measures to promote heat network zones are implemented as soon as possible.	

79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?	There is limited capacity at present. The challenge is having a standardised and readily available way to measure this, otherwise reporting of carbon accounting is of limited value. Development of carbon accounting tools by government for use by LPAs and developers would be highly beneficial.	
80: Are any changes needed to policy for managing flood risk to improve its effectiveness?	As policy on managing flood risk is fit for purpose and can currently be effectively implemented, our view is that no changes are required.	
81: Do you have any other comments on actions that can be taken through planning to address climate change?	See the response to question 78 above.	
82: Do you agree with removal of this text from the footnote?	Norwich City Council agrees with the removal of this footnote on the availability of agricultural land used for food production as it provides no certainty for the decision maker as to how to assess and weigh the availability of agricultural land in planning decisions.	The consultation proposes removing the following text from the footnote: "*The availability of agricultural land used for food production should be considered, alongside other policies in this Framework, when deciding what sites are most appropriate for development.*"
83: Are there other ways in which we can ensure that development supports and does not compromise food production?	No further comments beyond the response to question 82.	
84: Do you agree that we should improve the current water	Norwich City Council agrees that the proposed changes in relation to water resources developments should be made to ensure that projects of national	

infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?	importance are captured within the NSIP regime. This should provide the certainty required to speed up delivery of key water infrastructure projects such as large-scale water recycling. Water supplies and recycling are a key issues in the East of England.	
85: Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?	No further comments beyond the response to question 84.	
86: Do you have any other suggestions relating to the proposals in this chapter?	The council has no further suggestions in relation to this chapter.	
Chapter 10 Changes to local plan intervention criteria		
87: Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation? 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?	Norwich City Council recognises that it is essential that up-to-date local plans are in place. For this reason, working with its partners at Broadland District Council and South Norfolk Council, two strategic local plans and supporting local plan documents have been adopted in the last 15 years. The council agrees that, on balance, the clarity that new government local plan intervention criteria would provide as per question 87 would be preferable to relying on existing legal tests as set as an alternative approach in question 88.	
Chapter 11 Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects		
89: Do you agree with the proposal to increase householder	Norwich City Council agrees that householder application fees should be raised to at least meet cost recovery. The increase should initially be based	The fee for householder applications is currently £258 per application. Cost recovery is estimated to be at around

application fees to meet cost recovery?	on government's evidence-based estimate of £528 (see also the responses to questions 92 and 96 below).	£528.
90: If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387. If Yes, please explain in the text box what you consider an appropriate fee increase would be.	N/A – see the response to question 89 above.	
91: If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate? Yes No – it should be higher than £528 No – it should be lower than £528 no - there should be no fee increase Don't know If No, please explain in the text box below and provide evidence to demonstrate what you	We agree with this estimate -see the response to question 89 above.	

consider the correct fee should be.		
92: Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.	The principle for setting fees should be that they at least cover costs and can contribute to covering the cost of other aspects of LPA services. (see the response to question 96 below). The current fees for discharge of condition applications, prior approvals and Section 73 applications do not meet the costs of determination. S.73 and condition applications tend to be more complicated for major applications than for minor and other applications (although not always). Fees could be set to differentiate between the different kinds of applications. Prior approvals have grown increasingly complicated: those that require specialised input to consider noise, traffic impact, flooding, natural light etc. attract the same fee as those for larger home extensions. The fee for the former should be increased to recover the additional costs of considering the more complex matters.	Examples given in the consultation document include prior approval applications, section 73 applications which refers to an application for the removal or variation of conditions and applications for the approval of details reserved by conditions.
93: Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.	The same principle should apply as above – fees need to be set that allow an LPA to recover the costs of processing and determining these types of application.	Applications not currently subject to fees include listed building consents, consent to undertake relevant demolition in a conservation area and works to trees that are protected because they are in a conservation area or subject to a TPO.
94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?	No, as locally set fees would put LPAs with lower land values at a disadvantage. They would face the same costs but may not be able to set fees at an appropriate level to attract development and recover those costs. Nationally set fees creates more of a level playing field.	

Please give your reasons in the text box below.		
95: What would be your preferred model for localisation of planning fees? Full Localisation – Placing a mandatory duty on all local planning authorities to set their own fee. Local Variation – Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally. Neither Don't Know Please give your reasons in the text box below.	Neither model is supported as national fees are preferable (see the response to question 94 above).	
96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services? If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?	Yes – plan making and conservation services both provide a benefit to the development industry by providing certainty and guidance. Increasing fees to cover a proportion of an LPAs costs is reasonable. Enforcement provides a wider public benefit but also encourages compliance, which is a specific benefit to the development industry, encouraging all to follow the regulatory process. Funding enforcement activities could be entirely covered by application fees.	Wider planning services include plan-making, enforcement, heritage and conservation and design services. It is estimated that to cover the costs of the wider planning service all existing planning fees would need to increase by 157%.

97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?	See the response to question 96 above.	
98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?	Norwich City Council does not wish to comment on development consent orders as they apply to major infrastructure projects and are rarely relevant to planning in Norwich.	A development consent order is a legal instrument that grants permission for major infrastructure projects to be constructed. Although development consent order decisions are not made by the LPA, they play a crucial role in the process. Applicants are required to consult LPAs and LPAs help to secure effective connections to local infrastructure, identify and mitigate local impacts and address the impact of construction and operation of major projects on local communities and the environment. They are also responsible for monitoring and enforcing Development Consent Order requirements. This is often time-consuming and resource intensive but LPAs are not currently able to charge fees for their services.
99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services	No response – see the response to question 98 above.	Applicants are required to consult local authorities listed under section 43 of the Planning Act 2008. This includes host local authorities (both upper and lower tier authorities), districts and unitary authorities which border a host district of unitary authority and upper tier authorities which border a

which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.		host upper tier or unitary authority. Local authorities can seek to negotiate planning performance agreements with applicants, which can provide funding for an agreed level of service, however these can be uncertain and lead to lengthy negotiations which can slow an authority's ability to resource work in a timely and effective way.
100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?	If this question is aimed at discretionary activities such as pre-application advice, current guidance is appropriate and there is not a need to legislate for fees.	
101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.	Since this question focuses on development consent orders, it is unlikely to have significant impacts on Norwich, so no response has been made.	
102: Do you have any other suggestions relating to the proposals in this chapter?	We have no further suggestions.	
Chapter 12 The future of planning and plan making		
103: Do you agree with the proposed	Whilst the proposals for transitional arrangements do not apply to Norwich as its joint local plan with Broadland and	National DM policies seem likely to be available later this year. It seems to be

transitional arrangements? Are there any alternatives you think we should consider?	South Norfolk was adopted in March 2024, the council considers that a flexible approach should be allowed for recently adopted plans. Such an approach should allow for a limited review of recently adopted plans so that additional allocations can be made to meet any additional housing needs required by a changed methodology (see also the responses to questions 7 and 105).	unrealistic for a review of the Norwich DM policies plan to be promoted under transitional arrangements using the current plan-making regime.
104: Do you agree with the proposed transitional arrangements?	As above.	As above.
105: Do you have any other suggestions relating to the proposals in this chapter?	Whilst it is understood that the consultation is on amendments to the NPPF and thus does not focus on recently adopted plans, it would be helpful if additional information could be provided on the government's expectations for the review of such adopted plans. In general, Norwich City Council supports increased digitisation and the speeding up of the local plan-making process.	
Chapter 13 Public Sector Equality Duty		
106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how.	Since effective equalities duty legislation is in place, Norwich City Council does not have any response to make to this question.	

Is there anything that could be done to mitigate any impact identified?		

Appendix 2 Housing requirements in Norfolk

The existing housing requirements for each Norfolk district and for Greater Norwich, along with those arising from the proposed changes to the standard methodology and further analytical data, are set out for information in the tables below. The figures for the Greater Norwich authorities are highlighted.

These figures are derived from the government's spreadsheet referred to in paragraph 13 of the report and from analysis by consultants Lichfields (which is available here).

Norfolk districts

District	Annual requirement current methodology	Annual requirement proposed methodology	Increase between methodologies (%)	Change from current local plan (%)	Change from average delivery (%)	Net additional dwellings (3 year average)
Breckland	625	917	45	50	22	749
Broadland	501	877	75	25	28	687
Great Yarmouth	354	569	61	36	23	462
King's Lynn and West Norfolk	554	1,042	88	58	253	295
North Norfolk	556	943	70	136	148	380
Norwich	606	828	37	75	223	257
South Norfolk	821	942	15	10	-4	982

Greater Norwich:

Area	Annual requirement current methodology	Annual requirement proposed methodology	Increase between methodologies (%)	Change from current local plan (%)	Change from average delivery (%)	Net additional dwellings (3 year average)
Greater Norwich	1,928	2,647	37	30	37	1,926