

Appendix B

Implementation of the Greater Norwich Green Infrastructure Strategy Supplementary Planning Document (SPD)



Consultation Report, January 2026

1.0 Purpose of this Document

- 1.1 This purpose of this report is to summarise how Broadland District Council, Norwich City Council and South Norfolk Council involved communities and stakeholders in preparing the Implementation of the Greater Norwich Green Infrastructure Strategy Supplementary Planning (SPD). It summarises the responses received to the consultation and sets out how these comments informed the final version of the plan.

2.0 Details of the consultation

- 2.1 The consultation commenced on Monday 10th November 2025 and ended on Friday 19th December 2025. Norwich City Council's Statement of Community Involvement (SCI) sets out a requirement to consult on SPDs for the minimum statutory period of 28 calendar days. Broadland District Council's SCI and South Norfolk Council's SCI both require four weeks for consultations on SPDs. A six-week consultation was undertaken to give Town and Parish Councils time to consider the SPDs at their relevant meetings.
- 2.2 The consultation document **Implementation of the Greater Norwich Green Infrastructure Strategy Supplementary Planning Document** along with the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report and Equality Impact Assessment were available on the Norwich City Council website for the duration of the consultation. Broadland and South Norfolk's website included information about the consultation and directed interested parties to Norwich City Council's website for more information about the documents and for details on how to respond.
- 2.3 Consultation methods accorded with the SCIs for all three authorities. A variety of methods were used which included:
- Email to statutory consultees
 - Emails to all groups and individuals on the Norwich City Council plan-making database
 - Emails to all Broadland and South Norfolk Parish and Town Councils.
 - Emails to GI Strategy consultees
 - LinkedIn
 - Social media
 - Press release
 - Councils' websites
 - Paper documents in City Hall and the Horizon Centre
 - Announcement at October Agent's Forum meeting
- 2.4 Feedback could be submitted by email and post.

3.0 Responses to the consultation

- 3.1 The following bodies/individuals responded to the consultation.

- Broads Authority
- Woodland Trust
- Breckland Council
- Norfolk Police
- Individual
- National Highways
- Individual
- Historic England
- The Coal Authority
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- Natural England
- Norwich Climate Commission
- Norfolk Wildlife Trust
- East Norwich Programme Team

3.2 A table of the comments received is in Appendix 1. This also includes the Council's response to the comment and proposed changes to the SPD to take account of the comments as appropriate.

4.0 Summary

4.1 The responses to the consultation have helped inform the final version of the SPD.

Appendix 1: Consultation comments

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
Broads Authority	The text and maps include areas of the Broads Authority - are you expecting the BA to endorse the SPD? The SPD could be more explicit about how it should be used such as clarifying things or setting instructions. The GI SPD is not clear in its intentions 1.1 – It applies to the administrative Local Planning Authority areas of Broadland District Council, Norwich City Council, and South Norfolk Council. • As this is a planning document, rather than saying 'Broads National Park', please say 'Broads Authority Executive Area'. • What are the instructions for developers within this SPD? It is not clear what they are to do. • GI Strategy seems to cover the Broads. How should we be involved? Endorse the SPD? • Page 7 Blue spaces are shown annotated on the map. Do you need to set out what a 'blue space' is? Maybe you need a glossary?	It is not the intention for the SPD to apply to the areas for which the Broads Authority is the Local Planning Authority. The text of the SPD has been updated at para 1.1 to make this clear. It remains the decision of the Broads Authority if and how they wish to formally use the GI Strategy to inform planning decision making within their local planning authority area. A new section 2.2 has been added to the SPD to include a worked example which provides clearer instructions on how the GI Strategy should be used in the design of development and in decision making.	A new section 2.2 included.
Broads Authority	• Page 14 – last para: it would be good to be able to promote the area's heritage in the delivery of some of the projects mentioned (for example, Burgh Castle and Caistor Roman town are both mentioned – as well as others such as Whitlingham Country Park, Ladybelt	The remainder of the comments relate the GI Strategy document within the appendices. The consultation on the SPD focuses on <i>how</i> the GI Strategy should be	As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	Country Park, Earlham Park – all have heritage designations). As such other partners might include heritage organisations such as the Norfolk Archaeological Trust, Historic England etc. The promotion of heritage in some of these projects would provide many benefits, including potentially additional funding opportunities Page 17 Active Places – last bullet point – heritage sites could be included in the list of places that could be explored to provide accessible green spaces • Page 21 – gives the number of listed buildings as 116 – is this just the number in the Greater Norwich area as the Broads contains 279 listed buildings? Again, is the number of CAs given (18) just those in the Greater Norwich area as there are 25 in the BA area? • Page 21 – Industrial heritage – this also includes historic water management structures such as the dyke network and collection of drainage mills in the Halvergate Marshes Conservation Area, used to drain the land to enable its use for grazing • Page 22 – reference to Broads LCA – state currently being updated? • Page 32, second column – if this is the RAMS scheme then that needs to say that as that is what it is known as. • Page 34, urban tree canopy cover standards box – formatting issues	used for designing and locating development and determining planning applications. The GI Strategy document itself is a standalone evidence document that has been through several rounds of stakeholder engagement and consultation before being finalised. The Strategy has already been endorsed as a finalised evidence document by all three Greater Norwich authorities and therefore the content of the Strategy document is not the focus of this consultation and cannot be amended at this stage.	the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the GI Strategy.
Woodland Trust	1. Introduction The Woodland Trust welcomes the opportunity to comment on the Draft Greater Norwich Green Infrastructure Strategy Supplementary Planning Document (SPD). The SPD plays a crucial role in ensuring	Comments noted.	No changes required.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	that development across Norwich, Broadland and South Norfolk delivers high-quality, multifunctional green infrastructure (GI) that supports sustainable growth, nature recovery, climate resilience and the wellbeing of local communities. This response aims to ensure that the SPD: 1. Properly reflects the protections required by national policy, particularly for ancient woodland, and ancient and veteran trees (AVTs); 2. Fully aligns with the Environment Act 2021, Biodiversity Net Gain, Local Nature Recovery Strategy (LNRS), and Natural England's GI Framework (2023); 3. Integrates principles and technical guidance from the Planners' Manual for Ancient Woodland and Veteran Trees and the Woodland Trust Tree Strategy Template; 4. Helps the SPD deliver the ambitions of the Greater Norwich Green Infrastructure Strategy (2025) in a robust and spatially meaningful way. We strongly support the production of this SPD and offer the following recommendations to strengthen clarity, certainty, and environmental outcomes.		
Woodland Trust	2. General Support for the SPD's Purpose and Scope the SPD appropriately supports the interpretation of GNLP Policies 2 (Sustainable Communities), 3 (Environmental Protection and Enhancement), 4 (Strategic Infrastructure), 6 (Economy) and 7 (Growth Strategy). Its role as a material consideration is welcomed, as is the intent to guide consistent and collaborative GI delivery. In particular, the Woodland Trust supports: • The strategy's focus on strategic GI corridors and priority	Comments noted	No changes required.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	areas; • The use of spatial evidence including Area Profiles and the Strategic Delivery Plan; • Clear alignment with the emerging LNRS and commitments under the Environment Act; • Recognition of GI as essential infrastructure for climate change mitigation/adaptation, health, biodiversity, and placemaking. These components make the SPD a strong foundation for delivering regionally coherent GI across Greater Norwich		
Woodland Trust	3. Strengthening Compliance with the NPPF – Irreplaceable Habitats 3.1 Explicitly citing NPPF paragraph 193(c) 2 The SPD should explicitly restate NPPF para. 193(c), which states: “Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.” Clarity is essential: developers must not assume that mitigation or compensation makes impacts acceptable. Adjacency impacts to ancient woodland (e.g., hydrological change, pollution, shading, recreational pressure) also constitute deterioration under this paragraph. The Planners’ Manual for Ancient Woodland and Veteran Trees emphasises that this wording should be clearly conveyed in local policy to avoid misinterpretation. 3.2 Embedding the national mitigation hierarchy The SPD	Comments 3.1 noted - The SPD has been produced to support policies in the GNLP specifically therefore direct reference to NPPF policies is not considered necessary. The policies within the NPPF are national policies and will apply to relevant planning applications regardless of whether they are referenced in any local policies or guidance. No changes made. Comments 3.2 – 3.3 noted - The SPD has been produced to support policies in the GNLP specifically and therefore cannot include any new policy requirements such as adopting	No changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	should explicitly require application of the full mitigation hierarchy: 1. Avoid harm entirely; 2. Minimise impacts that cannot be avoided; 3. Mitigate residual harm; 4. Compensate only where development is wholly exceptional, noting that irreplaceable habitats cannot truly be replaced. This sequencing is essential for properly applying NPPF para. 193(c). 3.3 Buffering requirements We strongly recommend that the SPD adopts the Woodland Trust/Standing Advice standards: • 50m minimum buffer to ancient woodland (larger if major engineering or lighting is proposed, or where hydrology is vulnerable); • For ancient and veteran trees: o Root Protection Area = 15 × trunk diameter, or 5m beyond canopy, whichever is greater; • Nitrogen deposition assessments for ammonia-emitting developments within 5km of ancient woodland. These standards are evidence-based and essential to avoid deterioration prohibited by NPPF 193(c).	the Woodland Trust standing advice standards. In addition, the full mitigation hierarchy must be applied to development as per the requirements of the NPPF which apply to relevant planning applications regardless of whether they are referenced in any local policies or guidance.	
Woodland Trust	4. Green Infrastructure Delivery – Opportunities for Strengthening 4.1 Embedding the Lawton Principles The SPD rightly emphasises connectivity and multifunctionality. To strengthen its evidence basis, we recommend explicitly adopting the Lawton principles (“bigger, better, more joined up”), requiring major developments to demonstrate how proposals: • Increase the area and function of natural habitats (bigger); • Improve habitat quality and resilience (better);	The GI Strategy was produced by consultants and involved extensive stakeholder engagement before being endorsed by all three local planning authorities earlier in 2025. The GI Strategy is therefore already a fixed evidence base that cannot be changed as part of this SPD consultation. In addition, the Lawton Principles have	No changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	• Strengthen ecological and physical connectivity (more joined up). This would provide a clear and measurable test for GI adequacy. 4.2 Urban greening and canopy cover expectations The Tree Strategy Template provides critical guidance on expanding urban canopy. The SPD could strengthen its GI requirements by: • Expecting around 30 per cent canopy cover for major new residential and mixed-use schemes; • Requiring developers to incorporate street trees, natural regeneration and integrated SuDS planting early in masterplanning; • Requiring the use of UKISG (UK and Ireland Sourced and Grown) stock to minimise pest and disease risk. 4.3 Addressing tree and GI inequity The GN GI Strategy highlights inequalities in access to greenspace and canopy cover. The SPD should require: • GI uplift targeted to areas of greatest need, including deprived communities with lower greenspace access; • Consideration of Tree Equity Scores, 1 aiming for no score below 75; • Compliance with Natural England's ANGSt-like principles to ensure accessible greenspace within 200-300m.	biodiversity conservation as their primary driver. The GI Strategy is concerned with both the natural environment and also providing spaces for people, therefore the scope of the GI Strategy is wider than biodiversity alone. Measuring success of GI delivery will take place as part of the implementation of the GI Strategy through the Greater Norwich Growth Board work, therefore these comments will be forwarded to the GNGB to be considered in the implementation phase. Comments 4.2 noted - The SPD has been produced to support policies in the GNLP and cannot introduce new policy requirements such as requiring certain percentages of tree canopy over or requiring schemes to include certain features. No changes made. Comments 4.3 noted - The SPD has been produced to support policies in the GNLP and cannot introduce new policy	

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		requirements such as using Tree Equity Scores. In addition, the GI Strategy has updated the Natural England ANGSt methodology (referred to as ANGSt+) to include actual travel routes as part of identifying priority areas for GI provision - no changes made. The GI Strategy already encourages the provision of GI in areas with a deficit of GI or areas with high levels of deprivation, however this has been encouraged further by the inclusion of a new section 2.2 with the inclusion of a worked example which makes reference to this.	A new section 2.2 included.
Woodland Trust	5. Supporting Nature Recovery and BNG 5.1 Avoiding misuse of Biodiversity Net Gain BNG cannot be used to justify loss or deterioration of ancient woodland or AVTs. This should be stated plainly. 5.2 Linking BNG to LNRS spatial priorities To support nature recovery at landscape scale, the SPD should require BNG delivery to: • Align directly with LNRS opportunity areas; • Demonstrate how outcomes contribute to strategic GI corridors and ecological networks. 5.3 Encouraging natural regeneration	Comments 5.1 noted - this SPD is not explicitly concerned with BNG. There are statutory processes for BNG, and new Norfolk Local Nature Recovery Strategy and the Norwich Biodiversity Net Gain Planning Guidance Note that already exist in relation to this matter. Comments 5.2 noted - The GI Strategy and LNRS were produced concurrently and both	No changes made. New section 2.2 included.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	The SPD should explicitly encourage natural colonisation and woodland edge expansion where appropriate, consistent with both the LNRS and national woodland creation evidence.	documents have integrated relevant information as appropriate - no changes made. The SPD at para 2.1 states that development proposals are required to demonstrate how they contribute to strategic GI corridors, the Norwich Green Grid and other priority areas for GI, however this has been strengthened by the inclusion of a worked example in a new section 2.2. Comments 5.3 noted - the SPD is concerned with how the GI Strategy should be used to inform development proposals and does not make reference to any specific natural environment measures that must be undertaken. This is because the most appropriate GI measures will differ and need to be assessed on a site-by-site basis. It is therefore not considered appropriate to encourage these specific measures in a broad GI Strategy SPD.	No changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
Woodland Trust	6. Clarifying Developer Requirements 6.1 GI Design Statements 1 The SPD should require a standalone Green Infrastructure Design Statement for all major applications, including: • Baseline ecological and GI asset mapping; • Evidence of adherence to NPPF 193(c); • Impact assessments for ancient woodland, AVTs and other sensitive features; • Demonstration of alignment with the GI Strategy's objectives and corridor priorities; • Stewardship arrangements for at least 30 years. 6.2 Binding long-term management It is crucial to establish: • Secured long-term funding (e.g., commuted sums, management companies, trusts); • Ongoing monitoring requirements, including tree survival, canopy uplift and habitat condition.	Comments 6.1 noted - The SPD has been produced to support the GNLP policies and therefore cannot introduce any new policy requirements such as the submission of GI Design Statement for all major planning applications. Comments 6.2 noted - The long term management and maintenance of GI provided as part of or by new developments will be secured either through planning condition or S106 legal agreement where appropriate, as is the current standard practice.	No changes made.
Woodland Trust	7. Comments on Spatial Components of the SPD 7.1 Strategic GI Corridors We welcome the strong spatial logic of the GI corridors. To guarantee connectivity benefits, the SPD should require applications within or adjacent to corridors to: • Avoid severance or narrowing of ecological links; • Provide net improvements to corridor function, not only avoid harm; • Include tree planting and woodland expansion where appropriate. 7.2 Area Profiles add useful nuance and should:	Comments 7.1 noted - The SPD has been produced to support policies in the GNLP and cannot introduce new policy requirements such as requiring applications adjacent to corridors to not sever or narrow ecological links etc. The GI Strategy provides significant information on where the GI network in Greater Norwich can be enhanced and improved and the inclusion of the	A new section 2.2 included.

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	• Form part of the formal decision-making process; • Be explicitly referenced in GI Design Statements; • Be updated to include clear mapping of ancient woodland, AVTs and restoration opportunities.	worked example in a new section 2.2 of the SPD provides greater clarity on how the Strategy can be used to demonstrate new development is contributing to this network. Comments 7.2 noted - The area profiles will form part of the formal decision-making process via their reference in sections 2.1 & 2.2. See above comments regarding GI Design Statements. The maps within the GI Strategy are the culmination of a significant amount of data collection including national, local and remote sensed datasets. These maps cannot be updated as part of the SPD consultation, however comments on suggested changes for the maps will be passed to the Greater Norwich Growth Board so they can be considered as part of a future review of the strategy.	
Woodland Trust	8. Public Health, Climate and Social Benefits We strongly support the SPD's recognition of GI as a driver of: • Urban cooling and shading; • Flood mitigation and improved soil/water health;	Comments noted - The SPD has been produced to support policies in the GNLP and cannot introduce new policy requirements such as requiring major developments to	No changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	• Physical and mental wellbeing; • Social cohesion and community identity; • Nature connectedness, particularly for children and disadvantaged communities. We recommend an explicit requirement that major developments demonstrate quantifiable climate adaptation contributions through GI (e.g., tree density to reduce heat-island effects).	demonstrate quantifiable climate adaptation contributions as is consistent with the national Planning Practice Guidance (Paragraph 008-https://www.gov.uk/guidance/plan-making). However, the inclusion of a worked example in a new section 2.2 provides greater clarity on how the GI Strategy can be used to demonstrate, amongst an array of things, climate adaptation and mitigation measures in new developments.	
Woodland Trust	9. Summary of Key Recommendations For clarity and ease of implementation, the Woodland Trust strongly recommends: 1. Embed NPPF para. 193(c) directly into the SPD. 2. Adopt minimum 50m buffers to ancient woodland and robust AVT root protection standards. 3. Make the avoid–minimise–mitigate–compensate hierarchy explicit. 4. Introduce a requirement for GI Design Statements. 5. Establish measurable canopy cover expectations, including a 30 per cent target for major housing schemes. 6. Strengthen integration with the LNRS and ensure BNG aligns with spatial priorities. 7. Explicitly state that BNG cannot offset harm to irreplaceable habitats. 8. Require development to demonstrate contribution to the	Comments noted - see responses above.	No further changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	GI Strategy's strategic corridors and the Lawton principles. 9. Target GI uplift to areas of greatest social and environmental need. 10. Secure long-term stewardship and funding for GI.		
Woodland Trust	10. Conclusion The Woodland Trust supports the ambition and direction of the Draft Greater Norwich Green Infrastructure Strategy SPD. With the refinements outlined above, the SPD can provide a highly effective mechanism for: • Protecting irreplaceable habitats in line with NPPF para. 193(c); • Delivering a coherent, connected and nature-rich GI network; • Supporting climate resilience and the health and wellbeing of communities; • Ensuring development genuinely enhances the natural capital of Greater Norwich for the long term. We welcome continued engagement with the Greater Norwich authorities and look forward to supporting the ongoing implementation of the GI Strategy	Comments noted - see responses above.	No further changes made.
Breckland District Council	Breckland Council welcomes notification of the Sustainable communities SPD & Greater Norwich Green Infrastructure Strategy SPD. However, at this stage the Council does not have any comments to make on the draft SPD's.	Noted.	No changes made.
Norfolk Police	The draft SPD supports the delivery of high-quality, multifunctional green infrastructure. It provides guidance for developers, planners and communities on how to use	The consultation on the SPD focuses on <i>how</i> the GI Strategy should be used for designing and	No changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	the Greater Norwich Green Infrastructure Strategy to implement GNLP policies 2, 3, 4, 6 and 7. I wish to recommend the following for inclusion within: • Draft Implementation of the Greater Norwich Green Infrastructure Strategy SPD Award Schemes such as Green Flag are flourishing in Norwich. The award was launched with criteria to drive improvements in the safety of users and equal access for all, helping ensure every person, wherever they live, has access to a quality park or green space and the associated benefits that this brings to their physical and mental health. However, research conducted by Leeds University shone a light on the fact that women and girls face barriers in accessing our parks and green spaces because they often feel unsafe or unwelcome. Police Crime Prevention Initiatives (Police CPI) has always been focused on the prevention of crime in the built Environment. 'Safer Parks – Improving access for women and girls' further demonstrates the continuing commitment to improve places and spaces for all sections of society. Please encourage the use of this guide by all disciplines involved in the creation of public space and champion the cause for placing good design at the forefront of all considerations when undertaking such work. Design Guide Safer Parks PoliceCPI.pdf	locating development and determining planning applications. The GI Strategy document itself which is appended to the SPD is a standalone evidence document that has been through several rounds of stakeholder engagement and consultation before being finalised. The Strategy has already been endorsed as a finalised evidence document by all three Greater Norwich authorities and therefore the content of the Strategy document is not the focus of this consultation and cannot be amended at this stage. As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the Strategy.	

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	Furthermore, the provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood. In order to do this it must be carefully located to suit its intended purpose – mere residual space unwanted by the developer is very unlikely to be acceptable. SBD Residential Guide 2025 Secured By Design (SBD) Residential Guide 2025 promotes principles within its Development Design & Layout Section on communal areas and play spaces. Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour. The design and layout of play spaces will vary depending on the age requirements. - The space must be inclusively designed for all, with wide, clearly visible entrances and exits, and with due regard for wayfinding, permeability and natural surveillance, to ensure there are no potential hiding places or areas for inappropriate loitering. - Boundary security measures and features should strongly and clearly define the public, communal, semi-private and private spaces.	In addition, comments relating to referencing relevant designing out crime documents have been dealt with as amendments in the Policy 2 Sustainable Communities SPD which is being prepared at the same time as this SPD. Therefore these documents are not referenced in this SPD.	

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	Lighting provides reassurance and enables people to see at night that they are safe or, to assess a developing threat and if necessary, to identify a route they could take to avoid such a potential. How much light should be provided and what times these levels should be applied is a critical one for the success of a lighting strategy as it will, if correctly calculated, enhance the public's experience of an area whilst simultaneously increasing their safety in it. - Adequate mechanisms and resources must be put in place to ensure its long-term future management, such as landscaping and maintenance. - Care should be taken to ensure that a lone dwelling will not be adversely affected by the location of the amenity space. - It should be noted that positioning public amenity/play spaces to the rear of dwellings can increase the potential for crime and complaints arising from increased noise and nuisance. Nationally, the Police have sought to provide advice and guidelines to support and create safer communities, most notably reflected in their Secured By Design initiative which seek to improve the security of buildings and their immediate surroundings to provide safe places to live. It attempts to deter criminal and anti-social behaviour within developments by introducing appropriate design features that enable Natural Surveillance and create a sense of ownership and responsibility for every part of the development. Inclusion of the above is sought within the Supplementary Planning Documents where appropriate		

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
Nigel Hargreaves	I have only skimmed through this document and found it somewhat repetitive in draft form. I think it will be necessary, to improve access to green infrastructure and address the points made about aging and obesity, by a lot more attention and investment in building cycle/walking routes along each of the green corridors you have identified. This would speak to the points you make in the SPD on: • P20 Strategy - healthier, happier and more active people • P5 Deliver plan - Green Loop • P10 Strategic GI Opportunities - Accessible green space • P16 Strategic GI Opportunities - Urban greenways • etc. This would expand existing networks and critically, link rural communities together and with Norwich, by safe, nature accessible infrastructure that does not share rural roads. Financial contributions towards the cost of such accessibility infrastructure should be an explicit policy requirement of developers under SPD, Policy 2 Issue number 3 (Green Infrastructure) and link to coordination with wider transport policy for the spatial scope of the GNLP.	Comments noted. The SPD requires that the GI Strategy is used to aid the design and location of new GI (and enhancement of existing GI) and in particular to direct this provision or enhancement to the identified GI corridors within the strategy as part of new development proposals. Comments made in relation to the Policy 2 SPD are not relevant to the GI Strategy SPD.	No changes made
National Highways	No comment	Comments noted	No changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
David Barton	Submission of a 'universal consultation' response to all UK planning consultations. Community Campaigner David Barton is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government. David Barton is particularly concerned with Design Codes and SPDs relating to this across both designated and non-designated heritage assets.	The response is not specific to this consultation. It mainly relates to detail that would be contained within Design codes or conservation area appraisals. The provision of detailed design guidance and advice is not the purpose of this SPD and therefore is not considered relevant in this instance.	No change
Historic England	Due to the important synergy between the historic and natural environment, Natural England guidance recognises that Green Infrastructure Strategies (GIS) should not only be considered in terms of the natural environment but also the role they can play in conserving and enhancing the historic environment. This broader function can increase the profile and applicability of the GIS and may increase the range of potential sources of future funding to deliver ambitions. GIS can, for example, be used to: • improve the condition of historic landscape features such as scheduled monuments at risk. • improve the setting of heritage assets • improve access to heritage assets esp. for schools, local community's and visitors • create a sense of place and tangible link with local history	The consultation on the SPD focuses on <i>how</i> the GI Strategy should be used for designing and locating development and determining planning applications. The GI Strategy document itself which is appended to the SPD is a standalone evidence document that has been through several rounds of stakeholder engagement and consultation before being finalised. The Strategy has already been endorsed as a finalised evidence document by all three Greater Norwich authorities and therefore the content of the Strategy	No changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	Your Strategy should include reference to the role in relation to the historic environment. Historic England would encourage consideration of the suggestions relating to the historic environment in the aforementioned Natural England guidance http://publications.naturalengland.org.uk/publication/35033 We would also encourage reference to the many landscape heritage assets within the District which appear on the national Heritage at Risk register. The GIS may well provide an opportunity to improve their condition and access, securing multiple benefits arising which chime with the objectives of this important initiative.	document is not the focus of this consultation and cannot be amended at this stage. As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the Strategy.	
Historic England	APPENDIX 1 Greater Norwich Green Infrastructure Strategy P14 Multifunctional, varied and connected - We recommend adding in reference to the role of GI in relation to heritage (see comments above) P14 Landscape-led and responsive to character – We welcome the reference to historic and cultural character. We recommend that reference to historic landscape characterisation is also added here. P17 We welcome reference to the historic environment include designated heritage assets. There are also non-designated heritage assets (archaeology, historic landscapes etc which, although not designated also form an important part of the GIA Network. Add reference to	As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the Strategy.	No changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
	these here. P22 3. Strengthening distinctive places – We welcome this section. Reference should also be made to historic landscape characterisation in this section.		
Historic England	APPENDIX 2 Greater Norwich Green Infrastructure Strategic Delivery Plan The Delivery Plan should include actions to address Heritage at Risk through Green Infrastructure measures. Opportunities to better connect heritage assets and enhance the setting of heritage assets through green infrastructure.	As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the Strategy.	No changes made.
Historic England	APPENDIX 3 Greater Norwich Green Infrastructure Strategy Area Profiles We welcome the sections in the Area Profiles relating to Heritage/cultural GI assets. We advise that you should also assets on the Heritage at Risk register in each area. The profiles should also include non-designated heritage assets (e.g. archaeology, designed landscapes etc).	As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the Strategy.	No changes made.

Respondent	Comment	NCC/BDC/SNC response	Changes (all paragraph references relate to the consultation version of the SPD rather than the amended version)
The Coal Authority	The Coal Authority are a Statutory Consultee in the planning process in coalfield areas across England, Scotland and Wales. Is it noted that your Authority's boundary falls outside of the coalfield area. On this basis we have no interest in your plan area and no comments to make on the above consultation or on any future emerging planning policy documents.	Noted	No changes made.
Natural England	Natural England warmly welcomes the draft SPD, as implementation of the Greater Norwich Green Infrastructure Strategy will help various policies within the Greater Norwich Local Plan in the delivery of good quality multifunctional green infrastructure (GI) across the plan area. An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulations Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. However, we agree with your Authorities' reasoning as to why neither of the above SPDs will require an individual SEA or an HRA.	Comments noted - no actions required. SEA/HRA screening consultation with relevant bodies has been undertaken as appropriate for this SPD and determines that a full SEA/HRA assessment is not required as this was undertaken for the GNLP, and the SPD has been prepared to support the implementation of the adopted local plan	No changes made.

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Norwich Climate Commission	The Commission greatly welcomes the introduction of the Strategy and its supporting evidence base, and welcomes the SPD that will ensure that its use by developers is a material consideration in planning. It welcomes that in so doing developers will be able to assist in the delivery of the Strategic Green Infrastructure Initiatives such as the Strategic Green Infrastructure Corridors and Sites and the Norwich Green Grid. Lastly, it would also be helpful if the newly published Climate Change Committee report Duties and Powers for Local Authorities in the UK to Adapt to Climate Change were mentioned as a foundational document in these SPDs.	Noted. All of the evidence used to inform the preparation of the GI Strategy is referenced within the relevant documents.	No changes made.
Norfolk Wildlife Trust	Page 33: We support the plan to develop a GI planning checklist as this will help ensure that GI is fully considered and all options explored and integrated into development proposals. It is advised on page 33 that: 'Consideration will also be given to requiring planning applications for major and strategic development proposals to be supported by a Green Infrastructure Plan to demonstrate how the proposal responds to the requirements of the Local Plan's GI Policy...' The term 'consideration' cannot be robustly applied within the planning system. We therefore recommend that 'Major and strategic development proposals should be supported by a Green Infrastructure Plan...'	The SPD has been prepared to support the implementation of several policies in the adopted GNLP. An SPD cannot introduce new policy or new requirements that are not already contained within adopted policy, but can provide additional detail on how the policy can be implemented. This is consistent with the national Planning Practice Guidance (Paragraph 008-https://www.gov.uk/guidance/plan-making). The GNLP as the strategic local plan document for Greater Norwich has not adopted	No changes made.

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	Page 34: Regarding how the targets on page 34 of the Strategy (targets for Urban Greening Standards etc.) are applied to development, we recommend that further clarification is provided to ensure that relevant planning applications adhere to the targets rather than just use them as 'standards for consideration'. For example, to ensure that 'New major residential development will have at least 50% average green cover...' and 'Major development will achieve Natural England's Urban Greening Factors of at least 0.3 for commercial development. Etc.' Page 34: We recommend that until any targets are incorporated into future reviews of relevant plans, any specific measurable targets, such as those on page 34, are signposted within the SPD so that they are not missed in planning decisions. (They are currently embedded within a long document.)	the suggested targets referred to on page 34 of the GI Strategy, therefore this SPD cannot introduce this as a new measure of delivery of GI in Greater Norwich. However, these comments will be considered as part of the forthcoming local plan review. In addition, the consultation on the SPD focuses on <i>how</i> the GI Strategy should be used for designing and locating development and determining planning applications. The GI Strategy document itself which is appended to the SPD is a standalone evidence document that has been through several rounds of stakeholder engagement and consultation before being finalised. The Strategy has already been endorsed as a finalised evidence document by all three Greater Norwich authorities and therefore the content of the Strategy document is not the focus of this consultation and cannot be	

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		amended at this stage. As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the Strategy.	
Norfolk Wildlife Trust	Delivery Plan: We welcome the proposed initiatives within the delivery programme which will help to achieve the GI priorities. Strategic GI Opportunities, Active Places: Networks of green walking and cycling routes help to reduce carbon emissions, support nature's recovery, increase biodiversity, provide habitats for wildlife and improve habitat connectivity. They can also help to reduce flood risk whilst also providing health benefits for people. We therefore particularly support the aim to 'Explore opportunities for enhancing and expanding a network of urban greenways providing off-road, traffic free active travel routes for walking and cycling.'	The consultation on the SPD focuses on <i>how</i> the GI Strategy should be used for designing and locating development and determining planning applications. The GI Strategy document itself which is appended to the SPD is a standalone evidence document that has been through several rounds of stakeholder engagement and consultation before being finalised. The Strategy has already been endorsed as a finalised evidence document by all three Greater Norwich authorities and therefore	No changes made.

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	However, to assist in identifying the type of green infrastructure that might be appropriate for development proposals, we recommend that there is also specific reference in this section to incorporating natural SuDS and other green infrastructure into the design of new and enhancement of existing off-road, traffic free active travel routes. We recommend that opportunities should be sought for development proposals to sensitively and creatively incorporate GI into the design and layout of active travel routes including; trees, shrubs, wildflowers, natural SuDS such as rain gardens, bioswales, planters, tree pits etc.	the content of the Strategy document is not the focus of this consultation and cannot be amended at this stage. As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the GI Strategy.	
Norfolk Wildlife Trust	We also recommend that the opportunities below are included and incorporated into the delivery programme to ensure that the network of GI is optimised and to further assist in identifying the type and scale of green infrastructure that might be appropriate for development proposals. The recommendations particularly relate to the following policies of the GNLP: Policy 2, Sustainable Communities and Policy 3, Environmental Protection and Enhancement. Also relevant are Policies 4, 6 and 7. • Living roof bus shelters, bin stores, cycle shed storage, sheds etc. We note and welcome that green roofs are included in the text throughout the strategy. We particularly advocate the	The consultation on the SPD focuses on how the GI Strategy should be used for designing and locating development and determining planning applications. The GI Strategy document itself which is appended to the SPD is a standalone evidence document that has been through several rounds of stakeholder engagement and consultation before being finalised. The Strategy has already been	No changes made.

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	addition of green roofs/walls to buildings, particularly civic, educational and commercial buildings as they provide many benefits; increasing biodiversity, reducing run-off, improving air quality, improving thermal performance by providing shading and insulation which contributes to greater energy efficiency, whilst enhancing aesthetic appeal to areas. However, we recommend that other creative/innovative solutions using green/living roofs are included in the relevant sections of the delivery plan, perhaps under 'Natural Places'. Using an example from Torbay; 'Living Roof bus shelters' are one of the latest measures being put in place to help make Torbay carbon neutral and tackle the climate emergency. Please see: Living Roof bus shelters help Torbay tackle climate emergency - Torbay Council. Green roofs can also be used successfully on sheds, bin stores, cycle sheds etc. and therefore we recommend that these opportunities are also incorporated into the text. • Living Green Screens We note that living green screens are included in the text on page 24 of the GNGI Strategy. However, we recommend that living green screens are also included under 'Strategic GI Opportunities' (Natural Places) pg 10, as they are becoming an increasingly popular solution to roadside air pollution. The installation of living green screens is very beneficial in helping to protect areas from pollution as they form effective pollution barriers. They also contribute towards	endorsed as a finalised evidence document by all three Greater Norwich authorities and therefore the content of the Strategy document is not the focus of this consultation and cannot be amended at this stage. As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the Strategy.	

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	increasing biodiversity whilst enhancing the aesthetics/attractiveness of an area.(They have been used for example around the perimeter of schools to help absorb PM10 particulates, on polluted streets with buildings on both sides where the air pollution is higher at street level than the area above the surrounding buildings etc.) • B-Lines: There may also be opportunities in the delivery plan to link in with B-Lines; a network of flower-rich insect superhighways which can form part of the solution to the loss of flowers and pollinators. (B-Lines – Buglife).		
East Norwich Programme Team	The proposed Strategy recognises that East Norwich is a strategically important for growth and this is welcomed. East Norwich can make a significant contribution to meeting Greater Norwich’s housing needs and supporting local and regional economic growth. A strategic approach to providing the green infrastructure to support this level of growth is supported as sites of this nature cannot feasibly be expected to meet all their needs on-site or on a piecemeal individual basis. Indeed, some nuance in the expectations for ‘major developments’ is required as complex brownfield regeneration sites have constraints and costs which other large sites, even those of a similar size, will not. The opportunities to enhance and expand GI for all are best delivered through a joined up approach and this	Noted.	No changes made.

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	needs to be implemented in a way which focuses on solutions that enable the delivery of new housing and economic development. We welcome further engagement with the Greater Norwich authorities on a strategic approach to supporting delivery of East Norwich as a key growth area for Greater Norwich.		
Redenhall with Harleston Town Council	1. What steps are being taken to achieve maximum accessibility to Green Spaces for people with mobility, sensory or mental issues e.g. suitable pathways, distance from parking or public transport, public amenities. 2. How does the Policy mesh with those of adjoining Authorities such as the boundary with Suffolk across the Waveney which is a line on a map which is not recognised by nature or has any change in landscape.	The GI Strategy used an extensive evidence base to identify priority areas for GI delivery including analysing data on the type and amount of available green space, and how accessible those spaces are. As part of the delivery of GI projects accessibility needs of the local population will be a key consideration of any project design. The Gi Strategy and SPD apply to new development proposals within the boundaries of Broadland, Norwich and South Norfolk councils only as the relevant local planning authorities. However, the GI Strategy has been prepared alongside other	No changes made.

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		workstreams which cross these administrative boundaries including the Local Nature Recovery Strategy for Norfolk and Suffolk. As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the Strategy.	
Norfolk County Council (LLFA)	Page 13 - bullet point "improvement water management" This section could be improved to ensure better clarity. At present it states "GI reduces flood risk, improves water quality and natural filtration, helps maintain the natural water cycle and sustainable drainage at local and catchment scales, reducing pressures on the water environment and infrastructure, bringing amenity, biodiversity, economic and other benefits". 1.3.The LLFA suggests "GI can reduce flood risk, improve water quality and natural filtration and can help maintain	The consultation on the SPD focuses on how the GI Strategy should be used for designing and locating development and determining planning applications. The GI Strategy document itself which is appended to the SPD is a standalone evidence document that has been through several rounds of stakeholder	No changes made.

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	the natural water cycle through the use of sustainable drainage at local and catchment scales, reducing pressures on the water environment and infrastructure, providing amenity, biodiversity, economic and other benefits". 1.4. On page 15, the LLFA recommends that the phrase "flood defence" is amended to "flood risk management". Flood defence is a term that is associated with hard engineering solutions rather than the more nature-based solutions that are being promoted in this SPD. 1.5. In relation to the discussion on funding (Page 31), the LLFA notes that in the past the LLFA has not been able to access CIL funding as GI and flood risk were not included as funding issues that could be secured within the scope of CIL. The LLFA seeks confirmation whether this has now changed and seeks further information on how the LLFA can secure funding for nature-based flood risk management solutions through CIL in appropriate at-risk areas. 1.6. In relation to GI Strategy Link on page 40, please be aware that the LLFA is currently updating its Local Flood Risk Management Strategy. 1.7. In Appendix 2 - Table 2.1, the LLFA notes there is no mention of SuDs or sustainable drainage which focus on the management of surface water runoff. 1.8 However, there is reference to fluvial floodplain improvements and restoration. This is not consistent with the various references in the preceding appendix which referred to sustainable drainage and SuDs on a number of occasions. The LLFA requests that natural flood	engagement and consultation before being finalised. The Strategy has already been endorsed as a finalised evidence document by all three Greater Norwich authorities and therefore the content of the Strategy document is not the focus of this consultation and cannot be amended at this stage. As these comments relate to the content of the GI Strategy in the appendices and not the SPD text, no changes are required to the SPD. However, all suggestions for amendments to the GI Strategy and its evidence base will be considered by the Greater Norwich Green Infrastructure Project Team as part of the monitoring and review of the Strategy. Norfolk County Council were the project sponsor for and were represented on the Green Infrastructure Project Team group responsible for the production of the GI Strategy.	

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	management solutions for surface water management in affected areas is also considered because at present, there is an inconsistency between what the strategy is and what is proposed to be delivered. Further work is suggested. 1.9. In the Example GI Project Assessment Form, While the LLFA acknowledges there is a "strengthening blue-green infrastructure" box, the LLFA notes there is no linking, referencing or consideration of water management improvements as part of the GI project assessment such as in section 6.2 and 6.3. The LLFA requests better signposting to relevant organisations such as LLFA and IDBs who would also be responsible for consenting on ordinary watercourses. 1.10. In relation to the Area 2 - The Broads Wetlands section there is no reference to the Broadlands Future Initiative where they have been studies of various environmental issues about the future management of the Broad that relate to both flood risk and the environment. There could be useful information that would support the GI strategy. 1.11. In relation to the Area 4 - Yare Farmland, the LLFA notes the reference in opportunities "creating new habitat for reducing surface water runoff to reduce flood risk and regulate water quality". However, there is no indication as to where this may take place. Perhaps there is an opportunity for a discussion with the LLFA to help see if there are any areas of existing flood risk that could benefit. 1.12. Throughout the report and its appendices, flood risk is mentioned as a benefit yet there appears to be little		

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	identification of opportunities for the benefits to be realised. It is not clear to the LLFA whether a suitable amount of consideration has been undertaken in relation to this aspect. It is also not clear whether consultation or engagement with the LLFA was undertaken as part of the preparation of this SPD.		