

Cabinet

Agenda

Date

Tuesday 6 February 2018

Members of the Cabinet

Mr A J Proctor
Chairman (Leader) Policy

Mr S M Clancy
(Deputy Leader) Economic Development

Portfolio holders

Mr J F Fisher Environmental Excellence

Mr R R Foulger Communities and Housing

Mrs T M Mancini-Boyle Finance

Mr S A Vincent Planning

Time

9.00 am

Place

Council Chamber
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich

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If any Member wishes to clarify details relating to any matter on the agenda they are requested to contact the relevant Head of Service.



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**The Chairman will ask if anyone wishes to
film / record this meeting**

A G E N D A

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| 1 | To receive declarations of interest under Procedural Rule no 8 | |
| 2 | Apologies for absence | |
| 3 | <u>Minutes of meeting held on 9 January 2018</u> | 4 – 14 |
| 4 | Matters arising therefrom (if any) | |
| 5 | Public Speaking

To consider representation from the members of the public who have expressed the wish to convey their views on items on this Agenda.

In accordance with the Constitution a period of 3 minutes is allowed per member of the public. | |
| 6 | Representations from Non-Cabinet Members

To receive the views from non-Cabinet Members on items on this agenda. Members are reminded to advise the Leader if they wish to attend and speak at the meeting.

In accordance with the Constitution a period of 3 minutes is allowed per non-Cabinet Member. | |
| 7 | <u>Overview and Scrutiny Committee</u>

To receive the Minutes of the meeting held on 16 January 2018.

The Cabinet will also be advised of views expressed by the Committee at its meeting on 30 January 2018 in relation to items on this Agenda. | 15 – 22 |
| 8 | <u>Service Improvement and Efficiency Committee</u>

To receive the Minutes of the meeting held on 22 January 2018. | 23 – 26 |
| 9 | <u>Economic Success Panel</u>

To receive the Minutes of the meeting held on 23 January 2018. | 279 – 286 |
| 10 | <u>Financial Monitoring to 31 December 2017</u>

To receive a report from the Head of Finance and Revenue Services. | 27 – 29 |

11	<u>Treasury Management Strategy 2018/19</u>	30 – 48
	To receive a report from the Head of Finance and Revenue Services.	
12	<u>Joint 5 Year Infrastructure Investment Plan</u>	49 – 86
	To receive a report from the Head of Planning.	
13	<u>Norfolk Strategic Planning Framework</u>	87 – 232
	To receive a report from the Head of Planning.	
14	<u>Public Sector Equality Duty Annual Update</u>	233 – 253
	To receive a report from the Deputy Chief Executive.	
15	Exclusion of Press and Public	
	The Chairman will move that the press and public be excluded from the meeting for the remaining items of business because otherwise, information which is exempt information by virtue of Paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, as amended by The Local Government (Access to Information) (Variation) Order 2006, would be disclosed to them.	
16	<u>Asset Management</u>	254 – 268
	To receive a report from the Head of Economic Development.	
17	<u>Waste Collection, Street Cleansing and Grounds Maintenance Service – Contract Update</u>	269 – 275
	To receive a report from the Environmental Protection Manager (Special Projects).	
18	<u>Exempt Minutes of meeting held on 9 January 2018</u>	276 – 277

P C Kirby
Chief Executive

Minutes of a meeting of the **Cabinet** held at Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich on **Tuesday 9 January 2018** at **9.00 am** when there were present:

Mr A J Proctor – Policy

Portfolio holders:

Mr S M Clancy	Economic Development
Mr J F Fisher	Environmental Excellence
Mr R R Foulger	Communities and Housing
Mrs T M Mancini-Boyle	Finance
Mr S A Vincent	Planning

Mrs Bannock and Mrs Leggett were in attendance for part of the meeting. Mr D Harrison attended the meeting for its duration.

Also in attendance were the Deputy Chief Executive, Head of Democratic Services and Monitoring Officer, Head of Finance and Revenue Services, Head of Economic Development, Head of Corporate Resources, Corporate Finance Manager, Environmental Protection Manager, Historic Environment Officer and the Committee Officer (JO).

104 DECLARATIONS OF INTEREST UNDER PROCEDURAL RULE NO 8

Member	Minute No & Heading	Nature of Interest
Mr A Proctor	115 – Update Report on News Joint Venture Company	Non pecuniary, local choice interest as Director of the Joint Venture Company
	116 – Overview and Scrutiny Committee – Exempt Minutes	

105 MINUTES

The Minutes of the meeting held on 5 December 2017 were confirmed as a correct record and signed by the Chairman

106 REPRESENTATIONS FROM NON CABINET MEMBERS

The Chairman agreed that, at his discretion, all non-Cabinet Members in attendance be allowed to join the debate at the relevant point of the proceedings on request.

107 OVERVIEW AND SCRUTINY COMMITTEE

The Chairman of the Overview and Scrutiny Committee advised Members on the views expressed by the Committee when it reviewed the Cabinet agenda on 4 January 2018, as each item was considered.

Time and Task Panel Review: Broadland Early Help Hub

Members considered the recommendations by the Time and Task Panel, which had been deferred from the 5 December 2017 Cabinet meeting (Minute no. 92 – Overview and Scrutiny Committee).

The Chairman of the Panel advised the meeting that the Panel had been convened over March to October 2017 to assess the work of Broadland's Early Help Hub, which was a multi-agency team based at Thorpe Lodge which delivered early intervention to residents of all ages who required some form of support.

The Panel had attended several Hub collaboration meetings, where officers from any of the participating agencies could present cases to obtain more information or assistance from other agencies. The Hub operated a referral model through which residents could be offered support before issues became a problem requiring more specialised help.

Members were advised that it was clear that the service was beneficial for Broadland and that it compared favourably with Early Help Hubs at neighbouring authorities. However, there was no mechanism in place for measuring the performance of the Hub. Establishing a performance framework that would allow the benefits to be quantified was one of the 10 recommendations of the Panel as set out below:

- (1) Norfolk County Council to consider how a single point information sharing platform could be implemented for Norfolk Hub's use;
- (2) ensure the Council's new ICT Strategy takes account of the multi-agency working practices to enable fluent information exchange;
- (3) Broadland Early Help Hub to continue to form a performance measuring framework to assess success and cost-savings achieved by the Hub and report this at minimum on an annual basis to the Overview and Scrutiny Committee;
- (4) Broadland Early Help Hub Steering Group to consider running 'virtual Hub' meetings e.g. conference calls or video calling to provide opportunities for partners unable to attend collaboration meetings to participate in person eg school representatives;

- (5) the Broadland Early Help Hub Steering Group to strongly encourage representatives from Mental Health and Adult Social Care services to engage with the Early Help Hub;
- (6) Broadland Early Help Hub Steering Group to explore incorporating Age UK into the Hub as a partner or collaboration agency;
- (7) the Overview and Scrutiny Committee to request the six monthly Public Health Update reports include a chapter on the performance and effectiveness of the Broadland Early Help Hub;
- (8) Heads of Service to encourage professional curiosity in meeting the needs of residents; helping their officers to understand the principles of early help, how it affects their service area and how they can effectively link with services provided within the Early Help Hub;
- (9) the Overview and Scrutiny Committee to investigate further how the model of the Early Help Hub partnership working could be applied to other Council service areas;
- (10) in the course of investigating the Early Help Hub, Panel Members were made aware of a 'social prescribing' project; therefore suggest the Overview and Scrutiny Committee request information about it is included in the next Public Health Update report. Furthermore inviting the Early Help Hub Steering Group to explore effective links with social prescribing projects.

The Portfolio Holder for Economic Development commended the review of the Hub, which he considered an excellent initiative. He agreed with the Panel that it needed to be monitored to provide positive evidence of the benefits being produced for Broadland's Council Tax payers. He added that the recommendation for representatives from Mental Health and Adult Social Care to engage with the Hub was also particularly pertinent.

The Deputy Chief Executive confirmed that the Early Help Hub Steering Group now had a representative from Adult Social Services sitting on it. He also advised Members that he would be meeting with the Assistant Director of Adult Social Care at Norfolk County Council shortly and would discuss the Panel recommendations and would feed any responses back to the Overview and Scrutiny Committee in due course.

The Deputy Chief Executive also emphasised that a lot of the agencies had their own performance frameworks, but there was no overarching one for Early Help Hubs and he was of the view that one might be difficult to establish. He suggested that an alternative means of measuring the performance of the Hub might be to look at individual case studies. He also confirmed that Clinical Commissioning Groups (CCG) had had limited

involvement with Early Help Hubs at this stage, as they were commissioning bodies and not involved with delivery of services. However, a meeting was to be held with the North Norfolk CCG shortly and this was an issue that could be explored.

RESOLVED

to endorse and approve the recommendations of the Time and Task Panel.

108 WELLBEING PANEL

Cabinet received the Minutes of the meeting of the Wellbeing Panel held on 4 December 2017.

109 ENVIRONMENTAL EXCELLENCE PANEL

Cabinet received the Minutes of the meeting of the Environmental Excellence Panel held on 7 December 2017.

The Panel had considered a report about a proposal from the Environment Agency to rationalise parts of the Main River Network, which could have significant financial implications for the Council.

Members expressed concern about the potential costs to Council Tax payers in the district and emphasised that Broadland's representatives on the Internal Drainage Boards had a role to play in ensuring that the levies that they submitted to the Council were correct.

A report that set out proposals to expand and diversify the Food Safety Service was also considered and commended by the Panel, as it would be good for business and generate income for the Council.

Cabinet noted the Panel's views and it was:

RESOLVED

to

- (1) agree to the diversification of the Food Safety Service; and
- (2) delegate authority to the Portfolio Holder for Environmental Excellence and the Food, Safety and Licensing Team Manager to take all necessary steps to implement the decision.

110 SERVICE IMPROVEMENT AND EFFICIENCY COMMITTEE

Cabinet received the Minutes of the meeting of the Service Improvement and Efficiency Committee held on 18 December 2017.

111 COUNCIL OWNED BRIDGES ON THE BURE VALLEY AND MARRIOTT'S WAY ROUTES

The Council owned sections of two former railway lines: the Bure Valley Railway and a section of Marriott's Way, which was used as a long distance permissive footpath, bridleway and cycle route. Along these routes were 24 bridges and five culverts, owned by the Council and which a recent inspection had identified were in need of major repair. The report sought an increase in the capital budget of £120,000 pa for a period of five years for this purpose. Legal advice had been taken and it had been confirmed that the Council had a contractual liability to maintain the bridges.

It was noted that one of the bridges was in North Norfolk, but as this been installed by the Council, it was unlikely that North Norfolk District Council would contribute towards its maintenance, despite the economic and social benefits provided by the bridge. The bridge could be removed, but this would cost around £10,000 and leave Bure Valley train and footpath users without a safe walking route unless a new pedestrian crossing could be installed and a right of way negotiated with the owner of a nearby car park.

The other bridge in Attlebridge could be closed, but the bridge could not be allowed to collapse into the river and its removal would be likely to cost more than its repair.

The Portfolio Holder for Economic Development suggested that both North Norfolk Council and Norfolk County Council had an interest in maintaining access to the footways, as well as a number of nearby stakeholders such as parish councils and retailers.

It was proposed that accurate costings be identified for the high priority bridges and stakeholders approached regarding sharing the costs of the repairs and that a decision on the lower priority bridges be deferred to a later date.

RESOLVED

to

- (1) obtain accurate costings for the required works to the two bridges identified as high priority, for inclusion in the Capital Programme, and undertake discussions with other interested parties to seek a financial

contribution towards the repair costs; and

- (2) defer a decision on setting a budget for further bridge repairs pending a report back to Cabinet.

Reasons for decision

To meet the Council's contractual obligations.

112 BUDGET AND MEDIUM TERM FINANCIAL PLAN 2018-2021

The report presented a summary of Broadland's 2018/19 budget for net revenue and capital expenditure, as well as the schedule of proposed fees and charges for the year. It set out a three year projection, as there was increasing uncertainty about economic matters beyond this period. This was due in part to the reduction of the Revenue Support Grant to zero in 2021/22 and a forthcoming Fair Funding Review, which might result in less income for the Council.

The predicted level of New Homes Bonus also reflected a prudent estimate and no amounts had been included after October 2018, as the scheme was likely to be reformed.

The budget also took account of a rise in inflation to three percent to reflect contractual costs, income and supplier price inflation.

The report proposed the following Council Tax options for consideration:

- (1) Option 1 showed a rise in Band D Council Tax of £5.00 each year from 2018/19.
- (2) Option 2 showed no rise in Band D Council Tax for the year 2019/20 only, but allowed for an increase in Special Expenses of £5.00 in that year.
- (3) Option 3 showed no rise in Band D Council Tax in 2018/19 and 2019/20 but allowed for an increase in Special Expenses of £5.00 in 2018/19.

The public consultation on the budget had received 31 responses. Of these, 27 were in favour of a rise in Council Tax in order to protect the key services provided by the Council; two neither agreed nor disagreed with an increase in Council Tax and two strongly disagreed.

Members were asked to note the pressures on services throughout the Council and in particular those relating to Universal Credit and Housing Benefit changes.

The draw on the Council General Reserves was approximately £2m for Council Tax option 1, rising to £3.1m for option 2.

The Medium Term Financial Plan included provision for an uplift of two percent on salary costs in respect of inflation and Performance Related Pay (PRP) rises each year. A remuneration consultancy would provide the Council with recommended cost of living increases each year and should their recommendation for 2018 be close to the Local Government Employer's offer of two percent this would be considered. This did not include a decision on the PRP award. An additional one percent salary increase for the Council's staff equated to approximately £76,500 (including pensions and National Insurance contributions). This was not reflected in the draft budget.

During 2017/18, Broadland would receive a grant of £752,000 in relation to Business Rates Relief. It was proposed that this sum would be earmarked for the Business Rates reserve to address any loss of income through appeals.

The Portfolio Holder for Finance noted that there would a lot of variables to consider in the future not least collaborative working. She recommended Council Tax Option 2, as it would allow the additional cost of footway lighting to be passed on to the parishes that benefited by it and not the Council Tax payer across the district as a whole. She also noted that the current provision for pay was acceptable and that a decision on increasing the budget for this could be made when the remuneration consultancy made their report.

The Head of Finance and Revenue Services confirmed that an amendment would be made to the draw on capital receipts to take account of the £270,000 required for the bridge maintenance already agreed (see Minute 111).

The Chairman noted that an increase in Council Tax was justified if it served to maintain current levels of service and that Option 2 would help address the Special Expense issue in the short term, but a new way to manage the cost of footway lighting would need to be found in the longer term. He also noted that the possibility of an increase levy from the Internal Drainage Boards was part of a move to localise taxes, which would also need to be addressed in the future.

RECOMMENDED TO COUNCIL

to approve

- (1) the amendments to be included in the Budget for 2018/19 (attached at Appendix 1 to these Minutes);
- (2) proposed changes in discretionary fees and charges (attached at Appendix 2 to these Minutes);
- (3) the capital programme for 2018/19 to 2020/21, as amended (attached at Appendix 3 to these Minutes);
- (4) no rise in Band D Council Tax for the year 2019/20 only, but allow for an increase in Special Expenses of £5.00 in that year. Therefore a £5.00 Council Tax rise will be recommended for 2018/19 (Option 2);
- (5) the General Reserves draw for 2017 to 2021 (attached at Appendix 4 to these Minutes).

Reasons for decision

To meet the Council's statutory requirements for setting a budget.

113 BROADLAND AND SOUTH NORFOLK – COLLABORATIVE WORKING OPPORTUNITIES

Broadland and South Norfolk Councils had agreed to develop a Feasibility Study to explore sharing services. The paper outlined the opportunity for the early adoption of a shared Planning Management Team to support the delivery of a planning service at both councils.

Whilst the Feasibility Study was being developed it had been agreed to explore any potential shared arrangements as they presented themselves. South Norfolk had recently had a vacancy in a senior planning post, which presented an opportunity for a shared Planning Management Team. It was proposed to combine the planning teams from Broadland and South Norfolk together, under a joint Management Team comprising the following three posts: Head of Planning; Development Manager and Spatial Planning Manager. It was suggested that the proposal be an interim arrangement for an initial period of 12 months.

If agreed, the next stage would be for the Head of Planning and the managers to review team structures and identify if there were any opportunities for expanding service delivery, driving efficiencies and delivering further savings. The service would continue to be delivered from the respective council offices. The autonomy of the respective Planning Committees would remain as at present.

It was emphasised that the increased staffing costs, as set out in the report, would cease in March 2018. From then on a small saving would be made.

Both Council's Overview and Scrutiny Committees had considered the report and the following recommendations:

- (1) agree the introduction of an interim shared planning management team between Broadland District and South Norfolk Councils on the basis set out in the report;
- (2) agree that the new structure and post holders be in place by 22 January 2018; and
- (3) review the impact of the interim arrangements 3, 6, 9 and 12 months after being established. Reviews will be taken back to the informal joint member groups at each reviewing stage. After 9 months, both Councils to consider whether as a result of the wider Feasibility Study outcomes the arrangement is made permanent and a formal recruitment process is undertaken;
- (4) agree that officers be delegated authority to pursue other early opportunities without the need to go through the formal Member governance process.

The recommendations had been endorsed subject to the following amendments: Recommendation 3 should include reference to a six month review by the Overview and Scrutiny Committee and in recommendation 4 that the delegation to officers should be limited to opportunities regarding shared posts where vacancies occur and other contract opportunities.

The following additional recommendation had also been proposed by the Overview and Scrutiny Committee:

- (5) *that the Head of Planning provide Members with a clear plan of the arrangements for the respective Planning Departments over the next 12 months.*

The Head of Planning confirmed that he would be in a position to report on the arrangements for the respective Planning Departments to the Overview and Scrutiny Committee after three months.

Members expressed concern about recommendation 4, which lacked Member involvement in pursuing other early opportunities. The Chairman concurred with this view and suggested that meetings could be convened at short notice, if required, to make decisions regarding opportunities for sharing services. It was, therefore, proposed that recommendation 4 be amended to resolve that final implementation would go through the formal governance process.

RESOLVED

to

- (1) agree the introduction of an interim shared planning management team between Broadland District Council and South Norfolk Council on the basis set out in the report;
- (2) agree that the new structure and post holders be in place by 22 January 2018; and
- (3) review the impact of the interim arrangements at 3, 6, 9 and 12 months intervals after being established. Reviews will be taken back to the informal joint member groups at each review stage and to the Overview and Scrutiny Committee at the 6 month stage. After 9 months, both councils to consider whether as a result of the wider Feasibility Study outcomes the arrangement is made permanent and a formal recruitment process is undertaken;
- (4) agree that officers be delegated authority to pursue other early opportunities regarding shared posts where vacancies arise and other contract opportunities, but for final implementation to go through the formal governance process; and
- (5) that the Head of Planning provide Members with a clear plan of the arrangements for the respective Planning Departments over the next 12 months.

Reasons for decision

To explore an early opportunity for sharing services with South Norfolk Council.

114 EXCLUSION OF PRESS AND PUBLIC

RESOLVED

to exclude the Press and public from the meeting for the remaining business because otherwise, information which was exempt information by virtue of Paragraph 3 of Part I of Schedule 12A of the Local Government Act 1972, as amended by the Local Government (Access to Information) (Variation) Order 2006 would be disclosed to them.

115 UPDATE REPORT ON NEWS JOINT VENTURE COMPANY

The report provided information on the financial performance of the NEWS Joint Venture Company.

Following discussion; (as detailed in the exempt Minutes) it was:

RESOLVED

to

- (1) note the contents of the report; and
- (2) endorse the continuing progress made by NEWS to provide a cost effective way for this Council to process recycling it collects.

Reasons for decision

The report was a factual account.

116 OVERVIEW AND SCRUTINY COMMITTEE – EXEMPT MINUTES

A letter from the Managing Director of NORSE in response to the two main issues raised by the NEWS Time and Task Limited Panel was received.

Following discussion; (as detailed in the exempt Minutes) it was:

RESOLVED

to note the response to the letter from the Managing Director of Norse Commercial Services regarding the two main points raised by the Time and Task Limited Panel.

Reasons for decision

The letter was a factual account.

The meeting closed at 10.19 am

Minutes of a meeting of the **Overview & Scrutiny Committee** held at Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich on **Tuesday 16 January 2018** at **10.00 am** when there were present:

Mr J J Emsell – Chairman

Mr A D Adams
Mr G Everett
Mr R F Grady

Mr K Leggett
Mr G K Nurden

Mr V B Tapp
Mr D C Ward

Also in attendance were the Head of Democratic Services & Monitoring Officer, Head of Economic Development, Economic Development Manager, Overview and Scrutiny Research Officer and the Committee Officer (JO).

Mr Woodbridge was also in attendance for the duration of the meeting.

The meeting observed a minute's silence in remembrance of Mr Jack Sadler, an independent Member of the Standards Committee, who had recently passed away.

126 APOLOGIES FOR ABSENCE

Apologies for absence were received from Mrs Bannock, Mr Buck, Mrs Copplestone, Mr D Harrison, Mrs Hemsall, Mr Ray-Mortlock, Mrs Vincent and Mr Peck.

127 MINUTES

The Minutes of the meeting held on 4 January 2018 were confirmed as a correct record and signed by the Chairman.

Minute no: 120 – Budget and Medium Term Financial Plan 2018-2021

Members were concerned that Cabinet had recommended Council Tax option 2 to Council, which would result in a £5.00 increase in the Special Expenses in 2019/20.

A Member advised the meeting that this would result in a Special Expense increase of £5 for 300 households in Freethorpe for just five footway lights, which was grossly unfair.

The Head of Democratic Services & Monitoring Officer informed Members that they would have the opportunity to debate the issue at Council on 22 February 2018 and if any parish councils wished to speak on the matter they would also be allowed to make representations at that meeting. In

addition they had the opportunity to lobby the relevant Portfolio Holder.

Reference was made to a previous decision to convene a meeting with the five parish councils affected, which had subsequently been cancelled due to the invitation being declined or not responded to.

A Member suggested that the consultation meeting on street lighting should have still gone ahead with the smaller parishes, despite the two largest parishes affected having refused to attend.

It was noted that there remained an opportunity to negotiate on the provision and maintenance of footway lighting in the district ahead of the decision being implemented.

RESOLVED

to request the Portfolio Holder for Finance and Environmental Excellence to attend the meeting of the Committee on 30 January 2018 to discuss the matter further.

Minute no: 121 - Council Owned Bridges on the Bure Valley and Marriott's Way Routes

Members noted that Cabinet had decided to set aside funding for the high priority bridges and deferred a decision on further bridge repairs.

Minute no: 122 - Broadland and South Norfolk - Collaborative Working Opportunities

It was noted that it had been agreed to introduce an interim shared Planning Management Team with South Norfolk Council.

The Vice-Chairman advised the meeting that he and a number of other Members had visited Waveney District Council to discuss their experience of sharing services with Suffolk Coastal District Council. He confirmed that the process had worked very well for both Councils, which bode well for Broadland and South Norfolk, as they were starting from a better position.

Members were advised that the eventual merger of Waveney and Suffolk Coastal had come about as a result of a boundary review.

128 BROADLAND ECONOMY UPDATE

The report provided an update on the local economy over the past three months. Areas highlighted were:

- The Job Seekers Allowance claimant's rate in Broadland at the end of November 2017 was 485 people down from 600 people in May 2017.
- Two Broadland Business Forum meetings had been held. One on 12 July at Sprowston Manor Hotel with the key theme of tourism and the other on 11 October 2017 at The Cottage in Thorpe St Andrew, with a keynote speaker from Archant. Both events had been well attended.
- In March 2017 the 'Buy in Broadland' voucher booklet was sent out to over 58,000 homes with Council Tax invoices. The scheme had been extremely well received with many more businesses now coming forward and wishing to take part.
- The Choices Group continued to meet at Carrowbreck to tackle long term unemployment and barriers to work, often relating to low level Maths and English skills, lack of confidence and poor self-esteem.
- In mid-October 2017, the Council attended MIPIM at Olympia in London to promote the district as a potential development and growth area to investors from the UK and abroad.

The Greater Norwich Manufacturing Group, which was supported and co-ordinated by the Economic Development Manager (Partnerships and Growth) continued to grow in membership and reputation. A recent event was held at KLM's facility at Norwich Airport in December 2017 and was attended by 30+ business and education representatives from across the area.

The Financial Industry Group (FIG) held its second annual conference in November 2017 at the UEA. Speakers were drawn from a range of industry experts and were extremely well received.

November 2017 also saw the Norfolk launch of the Better Business for All (BBfA) initiative at the Abbey Conference Centre. Broadland's Economic Development Officers had played a key part in supporting and promoting this initiative which sought to bring 'regulators' from across Norfolk and Suffolk, together to offer businesses a cohesive, consistent and supportive service to enable them to prosper with the minimum of 'red tape'. Broadland's Chief Executive gave the keynote speech at the launch and would act as the local authority lead in respect of the implementation of the initiative in Norfolk.

In December 2017 the Vice Chairman, Leader and Cabinet Members joined members of the Economic Development Department to celebrate Small Business Saturday 2017. The group visited a number of small Broadland businesses over the course of the day and listened to their experiences of operating in Broadland.

Economic Development continued to run the very popular Tots2Teens service, which allowed parents to work during school holidays. It also ran the Broadly Active referral service, the Marriott's Way running event, three Parkruns and the Why Weight programme, which all assisted residents in becoming fitter and better able to work. A Member suggested that other activities such as cycling could be promoted on the Marriott's Way

In respect of the car parking questions raised by Members, the Head of Economic Development advised the meeting that this issue was subject to discussion with South Norfolk Council as part of the Feasibility Study and was also being discussed at the Economic Success Panel.

On-street parking enforcement in Broadland was delegated to King's Lynn and West Norfolk Borough Council via the Norfolk Parking Partnership. The surplus from parking charges was used to offset the cost of delivery of the service, which resulted in no cost to Broadland for this service. The majority of the income was derived from Great Yarmouth and King's Lynn.

Norfolk Parking Partnership's expenditure had been approximately £45,000 for 2016/17 and income for Broadland was around £10,000 leading to a loss of approximately £34,000 for the delivery of Broadland's on street parking service; how long this arrangement would stay in place was uncertain and it was probable that Broadland would be asked to contribute to the Partnership in the future.

The Council's off-street car parks were free as the Council wanted to encourage trade and visitors in market towns and villages. Due to the cost of parking enforcement it could not be implemented unless charges were in place to offset the cost and there remained the risk that this would still result in a cost for the Council. The car parks provided 300 spaces and cost approximately £17,000 per annum to maintain. Arrangements had also been made with two businesses in Aylsham and one in Reepham to provide free parking.

In response to a query, the Head of Economic Development confirmed that the Broadland Business Forums were very well attended and it had even been necessary to put a cap on the number of business attending according to the size of the venue. A list of attendees could be forwarded to Members if they wished, as could a list of those businesses that attended the Greater Norwich Manufacturing Group meeting at the KLM facility at Norwich Airport.

The meeting was informed that the 'Buy in Broadland' booklet contained 96 vouchers from businesses across the district. These businesses were subsequently contacted to confirm how many vouchers were redeemed. The vast majority of the responses were very positive and had shown an increase in footfall and sales. So far, 88 businesses had signed up for the next voucher booklet which would be published in March 2018.

Members were informed that the Choices Group tackled long term unemployment, which often related to low level Maths and English skills, lack of confidence and poor self-esteem. A case study would be published in *Broadland News* about how the Group had helped a lady back into work with a company that the Council had helped to start up. Clarion Housing Association was supporting the course to get its tenants back in the workplace and one of their officers might be available to speak to the Committee about their experience at a future meeting.

In response to a query, the Head of Economic Development made the point that the report was an update on activity in the Economic Development department; for more statistical information they should refer to the Broadland Business Plan, which had been presented to Cabinet in December 2017.

129 JOINT VENTURE ARRANGEMENTS

The briefing paper provided Members with an overview of Joint Venture Arrangements, which were increasingly being used by local authorities as a means of generating income, as well as meeting social and environmental needs. A joint venture allowed a council to draw on the expertise and resources of partners, whilst mitigating risk.

The Council currently had two Joint Venture Company (JVC) arrangements – NEWS delivering the Council's waste collection service and Broadland Growth delivering housing development. Each JVC arrangement had been negotiated on a case by case basis.

The process adopted thus far had been for negotiations to be led by the head of service in consultation with the relevant Portfolio Holder and a contract drafted with legal advice.

A Member questioned why the Council did not form a company on its own and buy in the relevant expertise, so that it could benefit from a greater share of the profits, as many other councils did. However, the Chairman noted that a JVC would mitigate any risk to the Council.

A Member suggested that if the Council was considering forming a JVC in the future Members should have scrutiny of the contract at an earlier stage. However, it was confirmed that once terms were provisionally agreed they were clearly outlined in a Cabinet report, which was subjected to scrutiny and ultimately approved by Council, so a degree of Member input already existed.

The Head of Democratic Services & Monitoring Officer reminded Members that the Carrowbreck project had resulted in a profit of £250,000 for the Council as well as considerable non-financial benefits, which had previously been reported. Any future projects would be reported to Cabinet and be subject to scrutiny by the Committee. It was also confirmed that the Council

charged for services that it provided for Broadland Growth Ltd.

A Member advised the meeting that historically Broadland had a very lean staffing structure, which made JVCs the most logical choice for commercial undertakings. Other councils had higher levels of staffing, so could put more resources into commercial activities and use different models.

Another Member also noted that setting up a company alone would be a big undertaking for Broadland and it would be better to mitigate the risk by working with a partner.

AGREED

- (1) to note the briefing paper; and
- (2) that a set of priorities be drafted that would clearly identify the Committee's financial, legal and qualitative expectations for any future JVC, so that it could be fully assessed against these criteria and allow Members to give a steer to Cabinet.

130 REVIEW OF OVERVIEW AND SCRUTINY PERFORMANCE

The report presented an appraisal of the Overview and Scrutiny Committee, which assessed how the Committee had moved forward and grown over the years, particularly in terms of its achievements and scrutiny of Council services.

The report also took into consideration the national changes to overview and scrutiny practices communicated by the Centre for Public Scrutiny and Communities and Local Government, who recently conducted a review of scrutiny practices.

It was also suggested that Actions and Outcome summaries from Norfolk Health Overview and Scrutiny Committee, Health and Wellbeing Board, Corporate Equalities Group and Police and Crime Panel be circulated as papers for information outside of the standard committee cycle. Any areas of concern could then be raised under a standing item on the agenda for any Review Proposals

Members were advised that they were already doing a lot of the good practice recommended in the Communities and Local Government Review and it was proposed to augment this by utilising the Forward Plan and Work Programmes from Cabinet-led panels to develop a streamlined Committee Work Programme to provide a strong basis for Cabinet and the Committee to work together. This could shift the focus of the Committee to take a greater overview role with scrutiny reviews being held on a rolling basis.

A Member also suggested that the Committee should look at the wider perspective and request that outside agencies attend its meetings (for example Highways England and the Environment Agency to respond to questions about the A47 and the Western Link to the Norwich Northern Distributor Road).

The Overview and Scrutiny Research Officer confirmed that subjects for discussion with outside bodies could be identified for the Work Programme. She also confirmed that the Committee underused the 'Appreciative Enquiry' and 'Mini Scrutiny' methods of scrutiny. An additional meeting could be scheduled for an 'Appreciative Enquiry', if necessary.

The Overview and Scrutiny Research Officer confirmed that she would recirculate the paper that set out the four approaches to scrutiny for Members' information.

A Member also suggested that the Committee could look at acute social problems, such as drug addiction in the district, during the coming year.

AGREED

to confirm the approach, as outlined above, for the Committee's next Work Programme.

131 NORFOLK HEALTH OVERVIEW AND SCRUTINY COMMITTEE UPDATE

The Committee noted the Outcomes and Actions from the meetings of the Norfolk Health Overview and Scrutiny Committee held on 7 December 2017 and 11 January 2018.

132 CORPORATE EQUALITIES GROUP

The meeting of the Corporate Equalities Group held on 11 January 2018 had been advised that the Youth Advisory Board was seeking to develop a mentoring system in youth clubs around bullying, cyber bullying and peer pressure.

The Community Project Officer was developing a number of Council actions on dementia, following the winding up of the Dementia Action Alliance.

A new simplified version of the Equalities Impact Assessment was agreed and would be introduced shortly. Report authors would be given training and the Overview and Scrutiny Research Officer suggested that it would be helpful to provide it as a refresher for the Overview and Scrutiny Committee.

133 OVERVIEW AND SCRUTINY COMMITTEE WORK PROGRAMME

The Committee Annual Report would be presented to the 20 March 2018 meeting. Scrutiny training would be included in the future Work Programmes.

134 EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

to exclude the Press and public from the meeting for the remaining business because otherwise, information which was exempt information by virtue of Paragraph 3 of Part I of Schedule 12A of the Local Government Act 1972, as amended by the Local Government (Access to Information) (Variation) Order 2006 would be disclosed to them.

135 EXEMPT MINUTES OF MEETING HELD ON 4 JANUARY 2018

The exempt Minutes of the meeting held on 4 January 2018 were confirmed as a correct record and signed by the Chairman.

The meeting closed at 12.45 pm

Service Improvement & Efficiency Committee

Minutes of a meeting of the **Service Improvement & Efficiency Committee** held at Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich on **Monday 22 January 2018** at **10.00am** when there were present:

Mr G Peck – Chairman

Mr G Everett
Mr C Harrison

Mrs M L Hemsall
Mrs J Leggett

Mr G K Nurden
Mrs K A Vincent

Also in attendance were the Head of Corporate Resources, Service Improvement Officer and the Committee Officer (JO).

26 APOLOGIES FOR ABSENCE

Apologies for absence were received from Mrs Copplestone, Mr Landamore and Mr Whymark.

27 MINUTES

The Minutes of the meeting held on 18 December 2017 were confirmed as a correct record and signed by the Chairman.

28 COLLABORATIVE WORKING

The Chairman advised the meeting that on 11 January 2018 Members from Broadland and South Norfolk Councils had visited Waveney District Council, who had shared services with Suffolk Coastal District Council for the past 10 years. The meeting had been very productive and Members had been struck by how positive both Members and staff there were about collaborative working.

The Head of Corporate Resources confirmed that the Feasibility Study Project Plan was progressing well and a series of workshops and briefings had been arranged to develop it further.

Two all-staff 'launch' briefings had been held by both Chief Executives on 10 January 2018. These had been videoed and were available on each council's respective intranet. The text of the questions asked by officers would also be made available shortly.

On 11 January 2018, a meeting to define their role and plan for the briefing with service leads had been held by the Joint Strategic Group. These briefings had been subsequently held on 18 January 2018 as two workshops with the Transformation Enablers (eg IT, HR and Business Improvement) and

with Strategic Intent Enablers (eg Economic Development, Planning and Strategic Housing).

It was emphasised that the Feasibility Study was not aiming to review all Council services, just those that helped achieve transformation and those that were drivers for growth and prosperity.

The next task would be for baseline data to be collected, so that the similarities and differences between both councils could be identified, as well as establishing a greater understanding of how both councils worked. Service leaders would also be tasked with identifying any opportunities for collaboration that could be presented to Members for consideration.

On 7 and 8 February 2018 further workshops would be held to develop a joint approach with service leads as well as frontline staff who would be able to bring their perspective to the project.

Further workshops would be held on 13 and 14 March 2018 where learning from the previous six weeks would be considered and proposals could be challenged and refined. The outputs from these meetings would be collated and drafted into an interim report to be made to the respective Cabinet and Council meetings in March / April.

A Member suggested that the whole of the Planning Department should have been consulted about the proposal to share their Management Team, not just the senior planning officers concerned, as inevitably the new arrangements would have an effect on the department as a whole.

It was also emphasised that the arrangements in the Planning Department were interim and would be reviewed at three, six, nine and 12 months. If available, progress would also be reported in the March interim report.

The Head of Corporate Resources advised Members that recent communications on the broader Feasibility Study had been discussed with the Senior Management Team and it had been decided to supplement existing methods in a less formal way. Therefore, it had been decided to have a number of meetings with smaller groups that would include all Council staff.

Members were also advised that governance was included in the services that would assist transformation, as if the councils were to share services in the longer term they would need to consider how to harmonise how the formal governance structures worked. This element of the project would, therefore, seek to identify how both decision making processes worked and the extent to which they could be aligned.

The Chairman informed the meeting that although sharing services might be an opportunity to access increased funding, the main drivers were economic

and housing growth across both districts and not the generation of income or making savings. He added that collaboration might also be a better proposition than having something imposed by central Government, without any Council input.

The Head of Corporate Resources advised Members that overall the Feasibility Study would place Members in a position to make an informed choice about future possible collaboration. The Study would draw together two elements: one would be to collate data about both authorities and identify similarities and differences and to ascertain what could be done to close any gaps in support of closer collaborative working. The second element would be to identify specific opportunities for collaboration that would drive forward economic and housing growth and broader transformation.

In response to a suggestion that the Feasibility Study appeared to be too inward looking and did not take account of the external environment, it was confirmed that the Strategic Group had a key role in taking an external perspective and would be looking at funding opportunities for the authorities as well as issues such as how the councils could be placed in a stronger position through collaboration in the event of a local government review in the future.

The Head of Corporate Resources confirmed that he would convey a request that an external opinion be sought on the Feasibility Study by the Strategic Group.

The meeting was also advised that the timescales for collaboration could be significant. For example, it had taken 10 years for Waveney and Suffolk Coastal to move from a shared Chief Executive to a shared workforce. This had been an organic process, rather than a rapid transformation and this was to be explained more clearly to staff at the staff briefings that were to be arranged.

The Chairman noted that the measure of success for sharing services would be a seamless transition that would not be noticed by residents.

Members were informed that the Leader would be giving a brief update on Collaborative Working to the Annual Parish and Town Council meeting on 24 January 2018.

29 WORK PROGRAMME

Income Generation had been suggested as an item at the last meeting and was to be included as an item for a future meeting. This had been proposed as it was clear that the Council would become increasingly reliant on Business Rates for its income and, therefore it should ensure that it supported businesses as much as possible.

In respect of the Performance Related Pay Review it was confirmed that this item had been deferred until the outcome of the Feasibility Study was known, as if collaboration was pursued aligning the terms and conditions of staff across both councils would be a likely aim.

The Chairman noted that work was being undertaken to draft a protocol on how the benefits of collaboration would be shared between the councils and that this might be available for the 5 February 2018 meeting of the Committee.

The meeting closed at 11.08 am

DRAFT

FINANCIAL MONITORING TO 31 DECEMBER 2017

Portfolio Holder: All

Wards Affected: All

1 SUMMARY

- 1.1 This report summarises the financial position of the Council at 31 December 2017.

2 KEY DECISION

- 2.1 This is not a key decision but has been published in the Forward Plan.

3 BACKGROUND

- 3.1 The simplified performance monitoring arrangements allow for the report to be presented to Cabinet at an earlier date than would otherwise be possible.
- 3.2 The 2017/18 Budget predicts a net contribution from reserves of £0.59m, comprising a £0.68m draw on General Fund reserves and contributions of £0.09m to earmarked reserves to fund irregular or cyclical expenditure.

4 RESOURCE IMPLICATIONS

- 4.1 The summary financial position for the Council at 31 December 2017 is:

Capital	Original Budget 2017/18	£1,675,900
	Supplementary budgets approved	£82,800
	Prior Year Carry-forward Budgets called upon	£316,400
	Total Capital Budget to 31 December 2017	£2,075,100
	Expenditure and commitments	£1,241,351
	Percentage of total budget spent or committed	59.8%
	Unspent budget carried forward from 2016/17	£414,900
	Expenditure/committed against carried forward budgets	£316.400
	Percentage of carried forward budget spent or committed	76.2%

Revenue	Original Base Budget (excluding Parish Precepts)	£11,309,600
	Budget profiled to date	£7,870,000
	Net revenue expenditure to 31 December 2017	£6,854,300
	Percentage of budget to 31 December spent	87.1%

- 4.2 The Council's General Fund Reserves began the year at £13.46 m. This figure includes a reserve of £343,600 unspent revenue budgets from previous years set aside to fund committed expenditure on delayed projects. The Council's current Medium Term Financial Plan (MTFP) covers the next three financial years and takes into account the risks and uncertainties surrounding the authority's various funding streams.
- 4.3 The importance of good financial management has been communicated to every officer within the authority. The level of unspent revenue budgets carried forward to be spent in the following year was £1,185,400 in April 2011; this was reduced to £343,600 in April 2017, due to a greater awareness of the need for financial efficiency.
- 4.4 This has been given higher prominence by the clear message from central Government that local authorities are expected to become self-financing in the medium term, together with a forecast in December 2016 that Broadland's Revenue Support Grant will fall to £30,000 in 2019/20 and to nil in 2020/21.
- 4.5 Expenditure against capital budgets is monitored to ensure that projects are proceeding with as little slippage as possible. It should be noted that capital projects may be subject to delays beyond the control of the budget officers concerned.
- 4.6 Reports on the major variances on revenue and capital budgets are circulated quarterly to Heads of Service with a request for explanations. These highlight specific service related budget issues to assist individual Portfolio Holders with their discussions regarding performance and financial efficiency.
- 4.7 The indications at this stage are that the draw on the General Fund Reserve at year end will be lower than the budgeted draw of £680,000, although the full extent of this will not be known until after the 2017/18 accounts are closed.

5 LEGAL IMPLICATIONS

- 5.1 There are no direct legal implications arising from this report.

6 RISK IMPLICATIONS

- 6.1 The Council has a duty to set a balanced budget before the beginning of the financial year to which that budget relates. Any significant deviation from that budget may indicate that the authority runs the risk of being unable to meet its financial obligations by the end of that financial year, or may have to make an unsustainable draw on its reserves to be able to do so.
- 6.2 The expenditure levels shown in Section 4 indicate that the Council will be able to keep within the budget approved for 2017/18. These are kept under review and budget officers ask the Accountancy Team for advice on expenditure that might exceed budgetary limits.

7 EQUALITIES IMPLICATIONS

- 7.1 There are no equality implications as the report is a factual account of the Council's financial position. The 2017/18 Budget was determined without bias and affects all groups in the District.

8 OPTIONS

- 8.1 Cabinet has the following options:
- (1) to note the report;
 - (2) any other decision that Cabinet considers to be appropriate.

Jill Penn
Head of Finance

Background Papers

None

For further information on this report call Jill Penn on (01603) 430589 or e-mail jill.penn@broadland.gov.uk

TREASURY MANAGEMENT STRATEGY 2018/19

Portfolio Holder: Finance
Wards Affected: All

1 SUMMARY

- 1.1 This report sets out the proposed Treasury Management Policy, Treasury Strategy Statement and Annual Investment Strategy for 2018/19. These are required by three key documents defining best practice, described in paragraphs 3.1, 3.3 and 3.5.
- 1.2 The Treasury Management Policy Statement 2018/19 forms Appendix 1 to this report. It defines the scope of the Council's treasury management activities and gives a high-level overview of Broadland's policies on borrowing and investments.
- 1.3 The Treasury Strategy for 2018/19 is set out as Appendix 2 to this report. It sets the objectives and parameters of the Council's treasury management activity for the coming financial year.
- 1.4 The Annual Investment Strategy 2018/19 forms Appendix 3 to this report. It sets out the Council's policies for the prudent management of investments, including its methods for assessing and managing the associated risks.

2 KEY DECISION

- 2.1 This is a key decision and has been published in the Forward Plan.

3 BACKGROUND

- 3.1 The Chartered Institute of Public Finance and Accountancy (CIPFA) issued a revised Treasury Management Code of Practice in 2017 (The CIPFA TM Code). The TM Code governs best practice in public sector treasury management and was formally adopted by the Council in March 2013.
- 3.2 The CIPFA TM Code requires local authorities to hold an annual review of the policies and strategies governing its treasury management activities and to have these approved by Council or its equivalent body before the start of the financial year to which they relate.
- 3.3 In April 2004 the historic regime of central Government controlling the level and source of debt taken on by local authorities was replaced by a system of debt self-regulation governed by the Prudential Code. The key words for the

Prudential Code were 'Affordable, sustainable and prudent.' Local authority borrowing was limited only by their own assessment of what they could afford; repayment of debt and interest, plus the revenue costs of the capital project.

- 3.4 Each authority must calculate Prudential Indicators, presenting them for approval and monitoring annually by Council or its equivalent body. These measure a variety of factors relevant to debt and treasury, forming a check on Prudential Code compliance at an early stage of debt decision making.
- 3.5 In April 2010 the Department of Communities and Local Government (DCLG) issued 'Guidance on Local Government Investments' (investment Guidance), which required local authorities to approve an Annual Investment Strategy each year, before the start of the year to which it relates.
- 3.6 The Investment Guidance was issued in response to concerns over the scale of treasury losses experienced by local authorities during the collapse of the Icelandic banking sector, and the focus is exclusively on the management of risks associated with investing surplus cash. Although there is some overlap with the Treasury Strategy, it is useful to present this as a separate document which captures the nuances required by the Investment Guidance.
- 3.7 The TM Code recommends that each authority should approve Treasury Management Practices (TMPs). The current TMPs were approved by Council in March 2014. These are kept under review and updated where necessary, with any major change brought to the attention of Council for consideration. No major changes have been made to the TMPs since March 2014.

4 RESOURCE IMPLICATIONS

- 4.1 The financing of capital expenditure and management of short-term cash resources has a major impact on the revenue budget through both interest receivable and to a lesser extent, interest payable.
- 4.2 The UK economy has been affected by the uncertainty following the vote to leave the European Union in June 2016. Interest rates have recently risen by $\frac{1}{4}$ percent (25 basis points) but continue to remain low. This has been reflected in the investment income in the 2018/19 Budget and Medium Term Financial Plan (MTFP).
- 4.3 Revenue Support Grant settlements have reduced significantly in recent years, and there is a stated intention to reduce this support to zero by 2020. With local authorities expected to become self-sufficient within five years, the need for an effective treasury management function has never been greater.

5 LEGAL IMPLICATIONS

- 5.1 Adoption of the CIPFA Code of Practice on Treasury Management is recommended by CIPFA and therefore falls within the remit of section 15 of the Local Government Act 2003.
- 5.2 Local authorities are required by Regulations 2 and 24 of the *Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 [SI 3146]* to have regard to the current editions of the CIPFA codes of best practice.

6 RISK IMPLICATIONS

- 6.1 This report and its appendices are primarily concerned with an assessment of the risks involved in the Treasury Management function of the Council.
- 6.2 The Policy Statement in Appendix 1 sets a framework of priorities to manage the risks involved. The Strategy Statement detailed in Appendix 2 sets limits and procedures within which these risks may be managed. The indicators in Appendix 3 provide benchmarks against which our levels of risk can be measured.

7 EQUALITIES IMPLICATIONS

- 7.1 Treasury decisions are made impartially, within the guidelines set out in Appendices 1, 2 and 3. The primary objective of the Council's Treasury Management function is to minimise risk to the principal amounts involved whilst still maintaining optimum liquidity.
- 7.2 The qualities of all potential counterparties are assessed impartially under these guidelines. It is not possible to treat counterparties equally with disregard to their creditworthiness, except at the risk of compromising the primary objectives set out in Appendix 1.
- 7.3 The distribution of funds represented by the Council's Capital Programme (Appendix 3) is subject to equality impact assessment as each new scheme is considered.

8 OPTIONS

- 8.1 The Cabinet is requested to consider the following:
 - (1) the adoption of the proposed Treasury Management Policy and Treasury Strategy Statements for 2018/19;

- (2) the recommendation of the adoption of the Annual Investment Strategy for 2018/19 by Council.

Jill Penn
Head of Finance and Revenue Services

Background Papers

CIPFA Codes (Treasury Management and Prudential Code)

Government Investment Guidance

For further information on this report contact Jill Penn on 01603 430486, e-mail jill.penn@broadland.gov.uk or Tim Spooner on 01603 430464, e-mail tim.spooner@broadland.gov.uk

Treasury Management Policy Statement

CIPFA defines treasury management as; 'The management of the authority's borrowing, investments** and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.'

Broadland District Council defines the policies and objectives of its treasury management activities as follows:

- (1) The authority regards the successful identification, monitoring and control of risk to be the prime criteria by which the effectiveness of its treasury management activities will be measured. Accordingly, the analysis and reporting of treasury management activities will focus on the risk implications for the authority.
- (2) The Council acknowledges that effective treasury management will provide support towards the achievement of its business and service objectives. It is therefore committed to the principles of achieving best value in treasury management, and to employing suitable performance measurement techniques, within the context of effective risk management.
- (3) The Council's borrowing will be affordable, sustainable and prudent and consideration will be given to the management of interest rate risk and refinancing risk. The source from which the borrowing is taken and the type of borrowing should allow the Council transparency and control over its debt.
- (4) The Council's primary objective in relation to investments remains the security of capital. The liquidity or accessibility of the Authority's investments remains the security of capital. The liquidity or accessibility of the Authority's investments followed by the yield earned on investments remain important but are secondary considerations.

**'Investments' in the definition above covers all the financial assets of the authority, as well as other non-financial assets which the authority holds primarily for financial returns, such as investment property portfolios. This may therefore include investments which are not managed as part of normal treasury management or under treasury management.

In summary, the Council's Treasury Management objectives are (in order of importance)

Investments

- (1) Security of capital
- (2) Liquidity (access to funds)
- (3) Consistency of return
- (4) Enhanced return

Borrowing

- (1) Affordability
- (2) Maturity profile
- (3) Interest Rate and Refinancing Risks
- (4) Borrowing Source (to ensure the Council retains, as far as is practicable, flexibility over its borrowing)

Last reviewed February 2018

Treasury Strategy Statement 2018/19

1 INTRODUCTION

- 1.1 The Treasury Strategy Statement sets out the aims and limits of the Treasury function for the 2018/19 financial year. It is based on the Head of Finance and Revenue Services' view on interest rates, as informed by forecasts provided by the council's treasury advisors (Capita), at the time of writing.

2 CURRENT PORTFOLIO POSITION

- 2.1 The authority is currently debt free, although the current Medium Term Financial Plan (MTFP) predicts the possibility of borrowing to finance the proposed capital programme. The capital programme and the MTFP will require a draw on cash reserves over the next five years but the authority will still be a net investor over this period.
- 2.2 Some town and parish councils and a local charity have occasionally deposited funds with the authority to assist with their cash flow. At 31 January 2018, third party deposits amounted to £128,000.
- 2.3 At 31 March 2018 the Council anticipates its investments (net of third party deposits) to be:

	£m
Externally Managed Funds (Pooled Funds)	13.0
Banks and building societies	15.0
UK Government Gilts	0.0
Total	28.0

3 TREASURY LIMITS FOR 2017/18

- 3.1 Under the Prudential Code liabilities such as committed lease payments and bank overdrafts are classed as external debt. As at 31 March 2017, the authority had £325,000 in capital liabilities, all relating to nominal embedded finance lease repayments, of which £228,000 was due within twelve months.
- 3.2 The authority is required to set limits on the level of external debt it is able to carry at any one time.

Limits on external debt	2017/18	2018/19	2019/20	2020/21
		Estimate		
Authorised limit	£6m	£6m	£6m	£6m
Operational boundary	£4m	£4m	£4m	£4m

- 3.3 Full Council should be advised at the earliest opportunity if the Operational Boundary is exceeded. The Authorised Limit must not be exceeded without formal agreement in advance by Council.
- 3.4 The authority is also required to set limits on its exposure to fixed and variable interest rates, to the maturity structure of its borrowing and the total amounts invested for initial terms of more than 364 days. As the authority is aware of the changing economic situation at the moment, it is minded to keep these limits as flexible as possible to take advantage of the best opportunities as they present themselves. These limits are therefore set as follows:

Upper limits	2017/18	2018/19	2019/20	2020/21
Fixed rate exposure	100%	100%	100%	100%
Variable rate exposure	100%	100%	100%	100%
Total principal sums invested for initial terms over 364 days	A maximum of £10m medium term (up to 5 years) and £5m long term (up to 10 years)			

- 3.5 If the authority decides to take up long-term debt to finance a major capital project in the future, it will discuss the matter with its treasury advisors to determine the best option in terms of repayment pattern, term and whether fixed or variable rates would be more efficient. As debt is likely to consist of one loan, it is not possible to set meaningful limits on the authority's debt maturity profile in advance.
- 3.6 The authority is required to calculate the ratio of its financing costs to its net revenue stream. Financing costs are broadly defined as the net of the return on investments and other financial assets, against the payments made on debt and similar financial liabilities. This is a measure of the authority's ability to meet any debt payments from its revenue. An increasing positive figure indicates an increasing inability to meet such payments. As Broadland is a net investor, its ratios are negative, and are relatively stable.

	2016/17 Actual	2017/18 Estimate	2018/19 Estimate	2019-20 Estimate
Ratio of Financing Costs to Net Revenue Stream	(0.35%)	(0.28%)	(0.03%)	(0.44%)

- 3.7 The updated Prudential Code (2017) states that in order to demonstrate that authorities take capital expenditure and investment decisions in line with service objectives and properly take into account stewardship, value for money, prudence and sustainability authorities should have in place a capital strategy that sets out the long term context in which capital expenditure and investment decisions are made. Broadland District Council maintains a regularly updated Capital Strategy (most recent iteration October 2017).
- 3.8 The authority's capital programme is a major influence on its expenditure. The total expenditure on the 2016/17 capital programme was £1.702m, of which £0.564m was funded from revenue sources. The revenue budgets within the current MTFP include the funding needs of the following capital programme:

	2017/18 £m	2018/19 £m	2019/20 £m	2020/21 £m
Capital programme	1.676	1.452	1.163	1.165

- 3.9 The Capital Financing Requirement (CFR) represents the authority's need to finance capital expenditure by means of borrowing or other long-term liability arrangement such as a finance lease. It is not necessarily matched by a corresponding external debt, as it may have been funded from the authority's own resources. The actual CFR for 31 March 2017 and the estimated CFRs for future years are as follows:

CFR as at 31 March:	2017 £'000	2018 £'000	2019 £'000	2020 £'000
CFR	554	327	122	1,349
Gross External Debt	325	120	1,346	1,053

- 3.10 The CFR is a key indicator of prudence. In order to ensure that debt will be only for a capital purpose over the medium term, the local authority should ensure that debt does not, except in the short term, exceed the total of the CFR in the preceding year plus the estimates of any additional CFR for the current and next two financial years.
- 3.11 The Head of Finance & Revenue Services reports that the authority had no difficulty in meeting this requirement in 2016/17, and that there is no difficulty envisaged for the current or future years. This view takes into account current commitments, existing plans and the proposals in the approved budget.

4 ADVISORY SERVICES

- 4.1 The Council employs a professional treasury management advisor to provide the following services:

- (1) Advice on counterparty credit worthiness
 - (2) Provision of economic and interest rate forecasts
 - (3) General treasury management and capital financing/borrowing advice and updates
 - (4) Investment advice and a monitoring service on the performance of the council's externally managed funds
 - (5) Advice on compliance with treasury management codes and practice
- 4.2 The current provider of treasury advice services is Capita Treasury Services. Their contract runs from 1 April 2017 to 31 March 2020

5 INTEREST RATES

- 5.1 The budget for 2018/19 assumes a return on investments of 0.5%, based on current rates for short-term investments plus a prediction of a greater level of investment in longer term investments. Longer terms attract a higher rate of interest; however, the authority is aware that the risk of counterparty default is also higher and will consider all such investments with regard to the risk of losing all or part of the principal sum. Market rates are currently priced with a view that Base Rate will remain low for the foreseeable future.
- 5.2 The provisional funding settlement predicts that central Government support will be removed by 2020/21, leaving all local authorities to rely on their own resources. The predicted draw on reserves to fund the authority's services and the consequent reduction in the level of investments will have an effect on investment income. Emphasis will be laid on increasing the return on the surplus funds left to invest without increasing the risk of loss of capital.

6 INVESTMENT STRATEGY

- 6.1 Approximately half of the Council's short term surplus cash is managed by three Pooled Fund managers, two appointed in 2011 and one in 2012.
- 6.2 The remainder of the available surplus cash is managed in-house as short-term investments, to accommodate operational cash flow requirements.
- 6.3 The authority is required to adopt an Annual Investment Strategy at the start of the financial year, with approval by full Council. The Investment Strategy for 2018/19 is set out as Appendix 3.

7 BORROWING STRATEGY

- 7.1 The current MTFP includes the need to find efficiency savings and income generation schemes within the next five years. Alongside this requirement, the authority has included a budget for potential borrowing to fund any major invest to save schemes. If this becomes necessary, advice will be sought from the authority's treasury advisors on the most efficient form of borrowing.
- 7.2 The difference between interest payable on debt and interest offered for short-term investments means that borrowing more than required or in advance of need incurs additional cost. Although the use of internal resources in lieu of borrowing is the most cost effective means of financing capital expenditure at present, alternative means of financing will be assessed as the need arises.
- 7.3 The Prudential Code for capital expenditure allows for authorities to take on debt to fund capital expenditure, provided that the implications of affordability, sustainability and prudence are fully considered. Should the need to borrow arise, these assessments will form part of the decision process.

8 ANNUAL MRP STATEMENT

- 8.1 The Local Authorities (Capital Finance and Accounting) (England) (Amendment) Regulations 2008 (SI 2008/414) and Guidance on Minimum Revenue Provision (MRP) requires full Council to approve a statement of its MRP policy in respect of the forthcoming financial year, indicating which of the four options set out in the Guidance are to be followed in the financial year:

Option 1: Regulatory Method

Option 2: CFR Method

Option 3: Asset Life Method

Option 4: Depreciation Method

- 8.2 The Council has adopted Option 3 as its policy for 2018/19.
- 8.3 MRP in respect of leases brought on balance sheet under the IFRS-based Local Authority Accounting Code of Practice will match the annual principal repayment for the associated deferred liability.

9 REPORTING ON THE TREASURY OUTTURN

- 9.1 The Head of Finance and Revenue Services will report to the Cabinet on treasury management activity and performance as follows:

- (1) Activity against the strategy approved for the year, a mid-year and year end review of treasury activity.
- (2) An outturn report on its treasury activity no later than 30 September after the financial year end.
- (3) Cabinet will be responsible for the scrutiny of treasury management activity and practices.

10 TRAINING

- 10.1 The CIPFA TM Code requires the Head of Finance and Revenue Services to ensure that all members tasked with treasury management responsibilities, including scrutiny of the treasury management function, receive training that enables them to understand fully their roles and responsibilities.
- 10.2 Any new member with treasury management responsibilities will be required to receive training. This has been provided in recent years by our treasury advisors, and has proved effective and popular.
- 10.3 Officers dealing with treasury management issues are encouraged to attend workshops run by the Council's treasury management advisors.

11 USE OF FINANCIAL INSTRUMENTS FOR RISK MANAGEMENT

- 11.1 Local authorities' legal power to use derivative instruments remains unclear. The General Power of Competence enshrined in the Localism Act is not sufficiently explicit. Consequently, the authority does not intend to include derivatives within its investment options.
- 11.2 Should this position change, the authority would develop a detailed and robust risk management framework governing the use of derivatives. Including derivatives into the treasury framework would be deemed a change in strategy and would be brought to full Council for prior approval.

12 MANAGEMENT PRACTICES FOR NON-TREASURY INVESTMENTS

- 12.1 The Council recognises that investment in other financial assets and property primarily for financial return, taken for non-treasury management purposes, requires careful investment management. Such activity includes loans supporting service outcomes, investments in subsidiaries, and investment in property portfolios. It will be recognised that the risk appetite for these activities may differ from that for treasury management.

Annual Investment Strategy 2018/19

1 INTRODUCTION

- 1.1 The Council has incorporated the best practice recommendations within CLG's 2010 'Guidance on Local Government Investments' ("Guidance") and CIPFA's 2011 'Treasury Management in Public Services: Code of Practice and Cross Sectoral Guidance Notes' ("CIPFA TM Code") into this Strategy.

2 INVESTMENT PRINCIPLES

- 2.1 All investments will be in sterling.
- 2.2 The general policy objective for this Council is the prudent investment of its treasury balances.
- 2.3 The Council's investment priorities are primarily the security of capital, with the liquidity of its investments a secondary consideration. The rate of return on capital will be subordinate to security and liquidity at all times.
- 2.4 The Council will aim to achieve the optimum return on its investments, after considering the proper levels of security and liquidity.
- 2.5 Borrowing with the sole intention of investing or on-lending to make a return is unlawful. The authority will not engage in such activity.

3 SPECIFIED AND NON-SPECIFIED INVESTMENTS

- 3.1 An investment is a specified investment if it meets all of the following criteria:
- The investment and any related payments are denominated in sterling
 - It is due or can be demanded to be repaid within twelve months
 - It is not defined as capital expenditure by virtue of regulation
 - It is made with a body of high credit quality as defined in 3.2 and 3.3 below, or with the UK Government, a local authority or a parish council.

3.2 A counterparty will be judged to be of high credit quality if it holds a credit rating from at least one of the credit rating agencies as follows:

- Short-term F1 or long-term A- (Fitch) or
- Short-term P1 or long-term A3 (Moody's) or
- Short-term A1 or long-term A- (Standard & Poor's)
- Short-term rating AAA or equivalent for Money Market Funds (MMFs).

The authority will use UK institutions and those from countries with a minimum sovereign rating of AA- from at least one rating agency.

3.3 Organisations with no credit rating or an insufficient credit rating may be included, subject to assessment by other criteria:

- Building societies that do not meet the criteria in 3.2 above may be considered for use if their assets are valued at a minimum of £3 billion. Such institutions will be added to the counterparty list only after consultation with the authority's treasury advisors.
- Part-nationalised banks can be included, subject to discussion with our treasury advisors. Should the bank subsequently be de-nationalised, any investment will be considered on the basis that it meets the ratings in 3.2.
- Property Funds will be considered after relevant due diligence has been undertaken in conjunction with our treasury advisors.

3.4 The authority will take into consideration additional indicators as available eg share price, credit default swap price, corporate developments and market sentiment towards the counterparties.

3.5 The Investment Strategy for 2018/19 takes into account the changes in rating methodology undertaken by all three ratings agencies during the course of 2015, in response to the removal of implied sovereign support.

3.6 The CIPFA TM Code states "Authorities are advised to have regard to the ratings issued by all three rating agencies – Fitch, Moody's and Standard & Poor's". Accordingly, where counterparty achieves the minimum credit rating from one ratings agency, the authority will consider the ratings given to that body by the other two.

3.7 The Council is authorised to invest in the following instruments in 2018/19:

- UK Government Gilts
- Treasury Bills (short-dated Government backed borrowing)
- Debt Management Agency Deposit Facility (UK Government backed)
- Term deposits with UK Government or local authorities
- Municipal Bond Agency
- Sterling denominated bonds issued by European governments or multinational development banks
- Deposits with banks and building societies which have “high credit quality” (see 3.2 and 3.3 above)
- Certificates of Deposit issued by banks and building societies
- Commercial Paper
- Corporate Bonds
- Property Funds
- Property Unit Trusts
- Money Market Funds with acceptable credit ratings (see 3.2 above)
- Other Money Market and Collective Investment Schemes (pooled funds)

Investments will be in sterling, will not be capital expenditure and credit quality limits will be observed. As such, they will be specified investments unless they are deposits made for fixed terms exceeding twelve months. Limits on non-specified investments are detailed in paragraph 5.3 below.

If investing in property funds a third party property fund selection service would be employed at a cost of £7,500 per annum, to support the Authority in deciding key objectives for the appointment of a manager, drafting questionnaire, collating responses and review.

4 SECURITY OF CAPITAL

- 4.1 The authority employs professional consultants to advise on matters relating to their treasury activities in the context of local and global economic matters. The current treasury advisor is Capita Treasury Services. The authority will monitor the quality of advice; however, the pool of established and respected treasury consultants is small, such that there is currently only one alternative provider available.
- 4.2 The Council will maintain a counterparty list based on the credit criteria in sections 3.2 and 3.3 of this Appendix. Exposure to overseas institutions will be discussed in advance with our treasury advisors.
- 4.3 The Council receives creditworthiness advice from its treasury consultant on a regular basis. Although it takes such advice into account in all considerations involving security of investments, in all matters of judgement the ultimate decision lies with the Head of Finance & Revenue Services.
- 4.4 The Council's lending list will be checked at least monthly. If a ratings downgrade or change in other creditworthiness indicators result in a counterparty no longer meeting the Council's minimum criteria, no new investments will be made with that organisation. If an organisation's rating is upgraded so that it fulfils the Council's criteria, the Head of Finance and Revenue Services will have the discretion to include it on the lending list.
- 4.5 Where an organisation holding investments for the authority either falls below, or is deemed to be in danger of falling below the minimum thresholds detailed in 3.2 and 3.3 above, the authority will consider whether to recall its funds immediately or to maintain a watch during the remainder of the investment's
- 4.6 Should the authority's banking services provider fall below the minimum credit criteria set out in 3.2 and 3.3 above, the Head of Finance & Revenue Services will ensure that reasonable measures are put in place to keep the authority's operational cash balances secure. These will include a consideration of any contingency banking arrangements and assessments of the need to procure an alternative banking services provider before the end of the current contract.

5 LIQUIDITY

- 5.1 Based on its cash-flow forecasts, the Council anticipates that its surplus cash balances will range between £23m and £40m during 2018/19. This will be dependent on the timing of expenditure on capital schemes and other large and unpredictable items.
- 5.2 The authority has reviewed its investment portfolio with the assistance of its treasury advisors. This review took account of the level of balances, the need

for liquidity, spending commitments, provision for contingencies and the feasibility of possibility that the funding situation may be better than previously anticipated. The review reveals that there may be some scope for medium and longer term investments.

- 5.3 Investments may be made for longer initial terms to take advantage of higher returns, with the security of capital and the need to fund operational activities prevailing as the primary objective. Unspecified investments will be made only after significant due diligence has been undertaken in conjunction with our treasury advisors and the Head of Finance & Revenue Services has been consulted. Term and monetary limits on long-term (unspecified) investments will be as detailed below:

Limits on long-term deposits	Fitch Long Term Rating (or equivalent)	Monetary limit	Term limit
Banks	A+	£5m	3 years
Banks – part nationalised		£5m per group	2 years
Property Funds	As advised	£5m per fund	No limit
Local authorities	N/a	£5m	5 years
Maximum invested in total for terms exceeding 12 months	A maximum of £10m medium term (up to 5 years) plus £5m long term (up to 10 years)		

6 INVESTMENTS DEFINED AS CAPITAL EXPENDITURE

- 6.1 The acquisition of share capital in any body corporate is defined as capital expenditure under Regulation 25(1) (d) of the Local Authorities (Capital Finance and Accounting) (England) Regulations 2003. Such investments will have to be funded out of capital or revenue resources and will be classified as 'non-specified investments'.
- 6.2 Investments in bonds issued by multilateral development banks or money market funds (defined in SI 2004 No 534 and subsequent amendments) will not be treated as capital expenditure. Additionally, investments in shares issued by real estate investment trusts (as defined in SI 2007 No 573) and the acquisition of shares in an investment scheme approved under the Trustees Investments Act 1961 (as defined in SI 2010 No 454) will not be treated as capital expenditure.
- 6.3 A loan, grant or financial assistance by this Council to another body for capital expenditure by that body will be treated as capital expenditure. Loans by this Council to local housing associations or other companies will be clearly identified as to their purpose, ie treasury or policy. Appropriate due diligence will be undertaken before any loan or financial assistance is provided.

7 PROVISIONS FOR CREDIT-RELATED LOSSES

- 7.1 If any of the Council's investments appeared at risk of loss due to default (ie this is a credit-related loss and not one resulting from a fall in price due to movements in interest rates) the Council will make revenue provision of an appropriate amount.

8 TRAINING

- 8.1 Officers invited to join the treasury management team will have been recruited through the Council's rigorous selection process, and have proved their competence through their work and qualifications. They are required to undergo further training; theoretical training provided by our treasury advisors, and practical training, provided by experienced colleagues.
- 8.2 Officers are encouraged to attend external workshops, to discuss matters with our treasury advisors and to network with their peers in other authorities on a regular basis.

9 EXTERNAL CASH FUND MANAGEMENT

- 9.1 The Council's externally managed funds are invested in collective investment schemes (pooled funds); the type and range of investments the individual fund can use are described in the fund's prospectus.
- 9.2 The performance and suitability of the three pooled funds are monitored by the Council's treasury management advisor and the Head of Finance and Revenue Services. A decision on the investment levels allocated to external fund management is linked to the review of alternative investment vehicles, and will be concluded early in 2017.

10 BORROWING IN ADVANCE OF NEED

- 10.1 The Guidance requires authorities to consider their policy concerning borrowing in advance of need.
- 10.2 The authority has considered the additional costs inherent in carrying debt held in advance of need against the advantages of fixing debt at the current low rates, and has determined that their policy is to borrow as close to the time of requiring the funds as possible.

11 SCRUTINY AND REPORTING

- 11.1 As required by the revised CIPFA Treasury Management Code, the Council will prepare as a minimum a mid-year and end of year outturn on its treasury activity, including investment activity.
- 11.2 Additionally, as required by the revised Code, Cabinet will be responsible for the scrutiny of treasury management activity and practices.

JOINT 5 YEAR INFRASTRUCTURE INVESTMENT PLAN

Portfolio Holders: Planning

Wards Affected: All

1 SUMMARY

- 1.1 This report proposes that Cabinet recommend to Council that the Greater Norwich Joint 5 Year Investment Plan, included at Appendix 1 be agreed.

2 KEY DECISION

- 2.1 This is a key decision and has been published in the Forward Plan.

3 BACKGROUND

- 3.1 Key pieces of infrastructure are required to support the planned level and distribution of growth set out in the Joint Core Strategy (JCS), such as new or expanded schools, road junction improvements and green infrastructure improvements, with some of the funding coming from the pooled Community Infrastructure Levy (CIL) pot. The Greater Norwich Infrastructure Plan (GNIP), which is updated regularly, sets out and describes the infrastructure that will support currently planned growth.
- 3.2 From 2017/18 onwards, a single Infrastructure Investment Plan (IIP) covering the whole of the three Greater Norwich districts has been prepared, for which pooled funding support from the Infrastructure Investment Fund (IIF) will be sought.
- 3.3 The Greater Norwich Five Year Infrastructure Investment Plan (January 2018, Appendix 1) therefore sets out the priorities for infrastructure spending for 2018/19. The 2018/19 IIP also includes infrastructure funding priorities for the subsequent four years to 2022/23 (i.e. it is a five-year investment plan).

4 THE ISSUES

- 4.1 The adopted Joint Core Strategy (JCS) identifies key infrastructure required to support the planned level and distribution of growth. The JCS has been developed with infrastructure delivery in mind and has an accompanying Implementation/Infrastructure Framework. The three local planning authorities have subsequently prepared a delivery plan, the Greater Norwich Infrastructure Plan (GNIP), which sets out and describes the infrastructure listed in the JCS and which is regularly updated (the most recent iteration was published in July 2017; see Appendix 1 for the weblink). The Annual

Business Plans for each district and the combined Annual Growth Programme are key parts of the GNIP process.

- 4.2 Delivery of the strategic programme of infrastructure is vital to keep the planned housing and jobs growth on track and Broadland District, Norwich City and South Norfolk Councils have agreed to pool CIL contributions to assist in delivery of the programme as part of the Greater Norwich Growth Board Joint Working Agreement. The programme supports the key aims of the Greater Norwich City Deal, which has infrastructure as one of its three strands.
- 4.3 The pooling of Broadland/Norwich/South Norfolk's CIL payments to the shared pot; the agreement in principle to use pooled CIL in future years to help ensure the delivery of Norwich Area Transportation Strategy projects, particularly the Norwich Northern Distributor Road and the Long Stratton bypass, have all previously been agreed by Cabinet and Council and so therefore do not need to be agreed specifically again this year.
- 4.4 Construction work on the Norwich Northern Distributor Road is nearing completion. Two sections of the 12 mile road opened towards the end of 2017 with the final section due for completion by March 2018. Previous Annual Growth Programmes approved by all the Greater Norwich authorities committed to support this project with £40m of local investment.
- 4.5 Updates on all projects with an element of CIL funding/borrowing endorsed in earlier and current Annual Growth Programmes for Greater Norwich are detailed in Appendix D of the IIP, which is Appendix 1 to this report.

5 DISCUSSION

- 5.1 The Draft Five-Year Infrastructure Investment Plan (Appendix 1) describes the background and development of the IIP, updates on some major infrastructure projects previously approved for delivery, the proposed 2018/19 Annual Growth Programme (AGP), and the Proposed Five-Year IIP. This information is therefore not repeated in this covering report.
- 5.2 The draft Greater Norwich Five-Year Infrastructure Investment Plan promotes 15 schemes across Greater Norwich to receive a total of £2,423,000 funding from the IIF for delivery starting in 2018/19. Appendix A of the Draft Five-Year IIP includes details of the projects proposed as the 2018/19 AGP.
- 5.3 Within Broadland/Norwich/South Norfolk for 2018/19 there are 5/7/7 projects, supported by £1,440,000/£1,005,000/£548,000 CIL funding from the IIF. These are:

Broadland

- Improvements to the Marriott's Way between Thorpe Marriott and Costessey (£100,000)
- Community Sports Hub proposal Horsford Manor site – (£1,000,000)
- Thorpe Marriott Greenway – £105,000
- Marriott's Way: Surfacing Works (Drayton) – £85,000
- Access for All – a five-year pot of £150,000 to allow various smaller-scale improvements to trails across Greater Norwich to be made (such as surfacing and gate/fence improvements), with decisions being made by the Infrastructure Delivery Board.

Norwich

- Green Pedalway – Earlham Road section – £560,000 over two years
- UEA to Eaton Boardwalk extension – £30,000
- Earlham Millennium Green Phase 3 – £25,000
- Yare and Wensum Valleys Link – £170,000 (for 19/20 onwards)
- Earlham and Mile Cross Library self-access improvements – £35,000 each
- Access for All – a five-year pot of £150,000 to allow various smaller-scale improvements to trails across Greater Norwich to be made (such as surfacing and gate/fence improvements), with decisions being made by the Infrastructure Delivery Board.

South Norfolk

- Improvements to the Marriott's Way between Thorpe Marriott and Costessey (£100,000)
- Signage and route improvements to and the development of a management plan for, the Wherryman's Way Yare Valley cycle route (£23,000)
- Self-access improvements to Harleston, Loddon and Costessey libraries (£35,000 each)

- Yare and Wensum valley links improvements (£170,000, from 2019/20 onwards)
- Access for All – a five-year pot of £150,000 to allow various smaller-scale improvements to trails across Greater Norwich to be made (such as surfacing and gate / fence improvements), with decisions being made by the Infrastructure Delivery Board. As examples, a number of potential improvements to the Boudicca Way (from Diss to Norwich) have been identified.

5.4 A description and the rationale for selecting these projects are included as Appendix A to the Greater Norwich Five Year Investment Plan (Appendix 1 to this report).

5.5 In the 2017/18 IIP, a cash reserve of roughly £2.6m was proposed to be built up over three years, equal to one annual repayment of the £50m which has been borrowed or committed to support the delivery of the Northern Distributor Road and the Long Stratton bypass. A total of £860,323 is proposed to be set aside to this end in 2018/19.

5.6 In addition to those projects detailed in Appendix A, the Draft IIP also proposes an allocation of £2m to be held in the IIF for 2018/19 for the purposes of helping to deliver the Children's Services' Capital Programme. This Plan also seeks a commitment to explore funding opportunities for the new Broadland Growth Triangle High School.

6 PROPOSED ACTION

6.1 It is proposed that Cabinet recommends to Council that the Joint Five-Year Infrastructure Investment Plan (Appendix 1) in general, and the 2018/19 projects proposed, for consideration by the next meeting of the Greater Norwich Growth Board, with the first year of the Infrastructure Investment Plan to be considered as the Annual Growth Programme for 2018/19 should be agreed.

7 RESOURCE IMPLICATIONS

7.1 The financial implications are detailed in the Investment Plan that accompanies this report. Members are reminded that the planned spending is funded by pooled CIL income.

7.2 The level of staff resource required to oversee the implementation of the Investment Plan is increasing as projects are being planned and come to fruition. This resource is not always provided by this authority (eg the transport programme is typically delivered by Norfolk County Council as part of the Transport for Norwich programme). Ensuring that there are adequate

resources to enable the delivery of planned infrastructure is likely to become a growing challenge for Broadland District Council in the forthcoming months and years.

8 LEGAL IMPLICATIONS

- 8.1 There are no legal implications arising from this report.

9 RISK IMPLICATIONS

- 9.1 The key risk is that the Investment Plan is rejected or delayed and as a consequence the delivery of infrastructure is delayed.

10 EQUALITIES IMPLICATIONS

- 10.1 An EqlA has been completed (attached at Appendix 2) and there are not considered to be any significant equalities implications arising from this report.

11 OPTIONS

- 11.1 The Cabinet has the following options to RECOMMEND to Council:

to

- (1) agree the Joint Five-Year Infrastructure Investment Plan (Appendix 1) in general, and the 2018/19 projects proposed, for consideration by the next meeting of the Greater Norwich Growth Board, with the first year of the Infrastructure Investment Plan to be considered as the Annual Growth Programme for 2018/19;
- (2) not agree the Joint Five-Year Infrastructure Investment Plan (Appendix 1) in general, and the 2018/19 projects proposed, for consideration by the next meeting of the Greater Norwich Growth Board, with the first year of the Infrastructure Investment Plan to be considered as the Annual Growth Programme for 2018/19;
- (3) any other recommendation that Cabinet considers appropriate.

Phil Courtier
Head of Planning

Background Papers

None

For further information on this report call Paul Harris on (01603) 430444 or e-mail paul.harris@broadland.gov.uk

Greater Norwich Growth Board

Joint Five Year Infrastructure Investment Plan

January 2018

Introduction

This Infrastructure Investment Plan sets out the projects for which pooled funding support from the Infrastructure Investment Fund (IIF) is sought through the Greater Norwich Growth Board (GNGB) during 2018/19 to support the delivery of planned growth. It also projects the infrastructure funding priorities for the subsequent four years to 2022/23. The schemes it identifies are those currently considered to be a priority for delivery to assist in achieving the economic growth targets as set out in the Joint Core Strategy and the Greater Norwich City Deal; one of the key strands of the City Deal was the delivery of an infrastructure programme facilitated by a pooled funding arrangement between the Authorities.

This Infrastructure Investment Plan incorporates the updated position on infrastructure delivery since the preparation of the 2017/18 Annual Growth Programme (AGP) which was agreed by District Councils in April and May 2017 and by Norfolk County Council, as the Accountable Body, in July 2017. Also included are revised Community Infrastructure Levy income projections, updates on infrastructure development and programming from previous AGPs and planned preparatory work for infrastructure schemes in future years.

Development of the Infrastructure Investment Plan

As part of developing the 2018/19 AGP the Greater Norwich Infrastructure Plan (GNIP) has been updated¹. The GNIP identifies infrastructure projects to 2026 and is used as the basis for identifying schemes for delivery in 2018/19 and projecting future infrastructure priorities over the subsequent period to 2022/23. The updated GNIP reflects progress made on infrastructure delivery and current knowledge of the timing of planned development schemes.

The first year of this Infrastructure Investment Plan should be considered as the proposed AGP for 2018/19. Thus approval of this plan will commit IIF funding to those projects identified for delivery in 2018/19. Projects in subsequent years will be confirmed through annual updates to the Infrastructure Investment Plan.

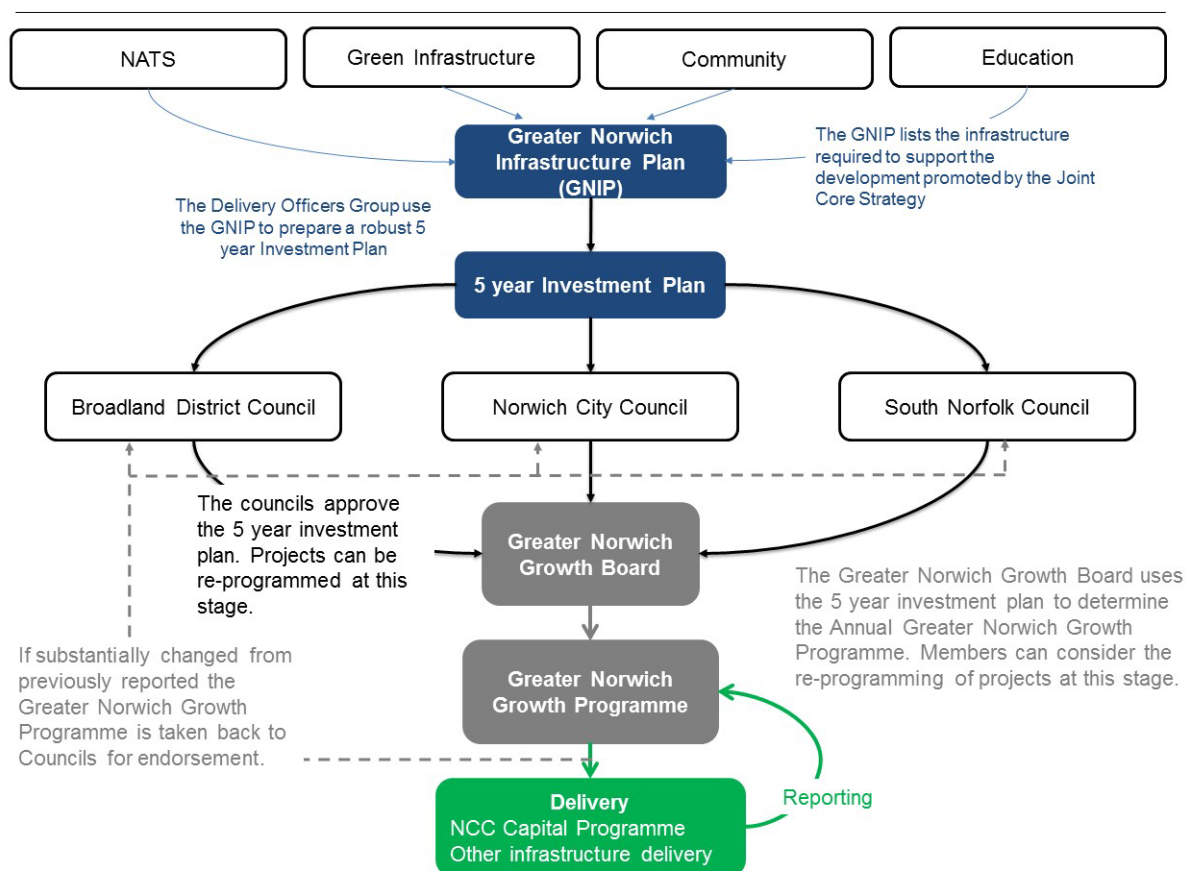
District Councils will consider the Infrastructure Investment Plan in February 2018. The GNGB will consider the Infrastructure Investment Plan at its meeting in March 2018.

As the Accountable Body for the GNGB, Norfolk County Council will also receive a report on the 2018/19 AGP in early 2018.

¹ <http://www.greaternorwichgrowth.org.uk/delivery/greater-norwich-infrastructure-plan/>

The Infrastructure Investment Plan process is illustrated in Figure 1, below.

Fig. 1 – Infrastructure Investment Plan Development Process



Project Updates

Updates for projects already approved for delivery through the AGP process are included at Appendix D.

Proposed 2018/19 Annual Growth Programme (AGP)

For the year 2018/19 Greater Norwich partners have identified 15 schemes totalling £2,423,000 as priorities to receive IIF support. In addition to this the proposal includes an allocation of £2m to be held in the IIF for the purposes of delivering the Children's Services' capital programme and £860,323 into its cash reserve. This Plan also seeks a commitment to explore funding opportunities for the new Broadland Growth Triangle High School.

There are a number of projects which have been agreed in previous Growth Programmes that were to be delivered over more than one year. These projects already have funding allocated to them and will continue to be taken forward in 2018/19 and beyond.²

² Details of the agreed Growth Programmes to date can be found at Appendix C

NATS including the NDR and Long Stratton Bypass and Hempnall crossroads junction

The Norwich Area Transportation Strategy (NATS) programme identifies future investment in the six Bus Rapid Transit (BRT) corridors to link major growth locations, measures in the city centre and measures to aid public transport, walking and cycling, as well as the Norwich Northern Distributor Road (NDR) and the Long Stratton Bypass and Hempnall crossroads junction.

It is likely that NATS projects will be primarily funded from sources other than the Infrastructure Investment Fund (for instance £11m Local Growth Funding has already been secured for NATS through the Growth Deal and in excess of £12m secured for cycle improvements to 2020 through the Cycle City Ambition Grant [CCAG]) although funding sources for projects in the longer term are yet to be secured.

The 2015/16 AGP agreed to the use of IIF funding to top up other funding to help deliver the NATS programme over the period 2015/16 to 2019/20. A total of £3,570,000 was committed from the IIF. It has not been necessary to draw down IIF funding in 2015/16 and 2016/17 because schemes have taken advantage of other funding streams including, in particular Growth Deal and CCAG to deliver projects. Indeed since the original IIF commitment was made Growth Deal committed an additional £4,175,000 to the implementation of NATS. In addition project development has improved our understanding of delivery and costs and as such the Infrastructure Delivery Board have agreed to re-profile the previously agreed top-up allocations as outlined below³:

Table 1 – re-profiled NATS programme supported by pooled CIL (£,000s)

	2015/16	2016/17	2017/18	2018/19	2019/20	TOTAL
Original NATS allocation	695	725	100	1,600	450	3,570
Additional CIL allocation	-	170	750	415	415	1,770
<i>Cumulative sub-total</i>	695	1,590	2,420	4,475	5,340	5,340
New NATS delivery profile incl. additional allocations ⁴	-	170	1,40	925	900	3,405
<i>Cumulative underspend</i>	695	1,420	860	1,960	1,935	1,935

In addition, the 2016/17 AGP agreed to use IIF funding in future years to ensure the delivery of NATS measures, including the NDR and Long Stratton bypass and Hempnall crossroads junction. Construction of the NDR is now almost complete and £40m of borrowing to support its delivery took place during the 2016/17 financial year. While the Long Stratton Bypass and Hempnall crossroads project has significant developer contributions associated with it, £10m of borrowing to support its delivery is likely to be required in 2018/19 and 2019/20. Borrowing will be repaid by future CIL income.

Work continues to determine the order, timing and detail of other NATS priorities and in securing funding from mainstream sources and other bidding opportunities as they arise.

Growth Deal funding will be sought to help fund the refreshed and updated NATS Implementation Plan. However, it is likely that there will be further requests for funding from the IIF after the currently agreed programme ends in 2019/20. As such a provisional

³ Further details can be found at Appendix E

⁴ Including A140 corridor scheme delivery

allocation of £900,000 per annum is included for the final three years of the Five Year Infrastructure Investment Plan.

Education

The education capital programme is significant over the Plan period with 17 new primary schools planned across the Greater Norwich area and 1 new high school planned in the North of Norwich⁵. In addition 6 schools require extending to support planned growth. Additional details of the requirements of growth on education provision can be found in the GNIP; a list of those projects prioritised for 2017/18 spend was put forward at the GNGB meeting on 13 July 2017.

Work will continue to determine the order, timing and detail of education priorities. This work will be overseen by Norfolk County Council's Children's Services' Capital Priorities Group. The Group will also keep under review funding availability. The current view of the Group is that Government allocations of Basic Need for school projects will be insufficient to cover delivery costs of the schools capital growth programme over the next ten years and that all options for covering this affordability gap will need to be examined. The Group's view is that an annual allocation of funding from the IIF would reduce uncertainty and allow the affordability gap in the Greater Norwich area to be better understood. Based on the current projected CIL income figures the Infrastructure Investment Plan gives a commitment to an annual £2m allocation to support the delivery of the Children's Services' capital programme. As part of the annual review of the Infrastructure Investment Plan, these forecasts will be updated and if CIL income varies significantly from projected figures, the allocation will need to be reviewed by all parties concerned.

The largest scheme within the education infrastructure programme is the new high school in the Broadland Growth Triangle. This Plan seeks a commitment to explore funding opportunities for this strategic project in order to mitigate any financial risk/uncertainty around its delivery to support growth. A progress report on the development of the new High School project is expected in early 2018.

⁵ Projects in the early development stages are not yet included.

Green infrastructure

A programme of strategic projects is proposed by the Green Infrastructure Programme Team over the next five years. The total value of projects proposed can be found in Table 2. Details of projects seeking IIF support in 2018/19 can be found in Appendix A.

In addition to projects seeking IIF support in 2018/19 a number of key strategic projects have been identified by the Green Infrastructure Programme Team:

Broadland Way

A key element of the North-east Norwich Growth Triangle (NEGT) Area Action Plan is an off-carriageway cycle and pedestrian route between east Norwich at Thorpe St Andrew and the Northern Broads at Wroxham known as Broadland Way. The intention is that Broadland Way will be a multi-functional Green Infrastructure corridor that will provide a safe commuting and leisure cycling and walking route for residents of the new development as well as providing ecological connectivity.

River Yare Crossing

This project is part of the wider East Norwich Gateway project (described below) and is a cycle/pedestrian bridge crossing the River Yare to enable better access to Whitlingham Country Park from the city centre.

Yare Valley

The project aims to develop the unifying concept of a river parkway, a linear country park based on the River Yare river corridor between Bawburgh and Whitlingham Country Park. The parkway would comprise of a linear corridor of linked spaces along banks of the River Yare. This 'umbrella' project was included in the Green Infrastructure Delivery Plan and included a number of smaller projects, some of which have been brought forward in part since the study was published.

North-West Country Park

A new country park in the north-west, potentially a wetland in the Colney/Bawburgh area.

River Wensum

A strategy is being developed to guide regeneration of the River Wensum Corridor in Norwich, extending to Whitlingham in the east, which is expected to be adopted in 2018.

The draft strategy objectives include enhancing connectivity throughout the river corridor, including with the Norfolk Trails network, and enhancing the natural environment and green infrastructure. Key green infrastructure proposals include completion of missing links of the Riverside Walk (projects for which are included in the investment plan), improvements to accessibility of the existing Riverside Walk (an approved project in the AGP) and enhanced links with the Broads network at Whitlingham in the longer term. Potential future GI projects include enhancement of Bishops Bridge to Whitefriars Bridge green space, and enhancement of the Boom Towers and Ber Street wooded ridge area.

The Riverside Walk is identified as a sub-regional green infrastructure corridor supporting growth locations in the Joint Core Strategy. All these projects will help support growth in Greater Norwich, particularly the green infrastructure requirements for anticipated new housing and employment development identified in the city centre and east Norwich.

Work is ongoing to progress developing feasibility work in support of these strategic green infrastructure projects to allow for capital investment to take place in future iterations of this Plan.

Community

A number of strategic community projects are proposed through the Infrastructure Investment Plan. These include library improvements, open space, community facilities, play space and sports facilities identified through the strategic review of sports facilities and playing pitches which reported in 2015 and taken forward by the Sports Strategy Implementation Group. The total value of projects proposed can be found in Table 2. Details of projects seeking IIF support in 2018/19 can be found in Appendix A.

Economic Development and Regeneration

A number of projects promoted in the IIP significantly contribute to the economic growth of the area. These include the public realm improvements promoted in the city centre, including Tombland and St Mary's Works which provide transport, green infrastructure and community benefit. These projects will be included as part of the refreshed and updated NATS Implementation Plan highlighted above.

One notable project is the delivery of significant public realm improvements, infrastructure and transport links at Norwich Airport Industrial Estate. This will enable this key employment location to offer more attractive, modern premises to better serve the needs of the existing SME community and those of emerging high value sectors identified in the New Anglia LEP Strategic Economic Plan and the Greater Norwich City Deal. There is an important synergy between this project and the improved transport connections that will be provided by the agreed St. Faiths Road to Airport project and the NE Norwich Link Road.

Another project of strategic significance is the East Norwich Gateway. This project will provide infrastructure to open up the development of the Utilities Site and Deal Ground (the largest brownfield sites within the Norwich City Council area) and extend cycling and pedestrian access from Norwich City Centre to Whitlingham Country Park in South Norfolk. The proposal would consist of three bridges, one across the River Wensum and two across the River Yare (one of which is the green infrastructure project referred to above) and associated road infrastructure.

The regeneration of brownfield land, particularly in the northern part of Norwich city centre will also be an important consideration for future work.

Cash Reserve

The 2016/17 AGP agreed to borrow £50m at PWLB project rate to support the delivery of both the Northern Distributor Road and the Long Stratton Bypass and Hempnall crossroads junction. The Infrastructure Investment Plan proposes that a cash reserve equal to one annual repayment be built up over 3 years from 2017/18. This Investment Plan looks to set aside £860,323.

Table 2 – Proposed Five Year Infrastructure Investment Plan

	to date	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
INCOME								
Balance brought forward	£3,396,917							
Actual CIL receipts		£3,214,589						
Forecast CIL receipts			£4,719,530	£7,271,195	£9,586,646	£10,956,389	£10,179,162	£8,853,709
Cumulative Income	£3,396,917	£6,611,506	£11,331,035	£18,602,230	£28,188,876	£39,145,265	£49,324,427	£58,178,136
EXPENDITURE								
Programme agreed	£182,827	£466,000	£5,543,323	£1,430,000	£1,065,000	£440,000		
Borrowing agreed		£404,938	£1,997,498	£2,064,776	£2,322,873	£2,580,970	£2,580,970	£2,580,970
Transport				£500,000	£60,000	£900,000	£900,000	£900,000
Green infrastructure				£363,000	£1,349,000	£1,783,000	£1,489,000	£436,000
Community				£1,175,000	£2,346,000	£3,800,000	£3,015,000	£100,000
Education				£2,000,000	£2,000,000	£2,000,000	£2,000,000	£2,000,000
Cash Reserve				£860,323	£860,323	£0	£0	£0
TOTAL	£182,827	£870,938	£7,540,821	£8,393,099	£10,003,196	£11,503,970	£9,984,970	£6,016,970
Cumulative Expenditure	£182,827	£1,053,765	£8,594,586	£16,987,685	£26,990,882	£38,494,852	£48,479,822	£54,496,792
Cumulative Surplus/Deficit	£3,214,090	£5,557,741	£2,736,449	£1,614,544	£1,197,994	£650,413	£844,605	£3,681,344

Full details of projects included in the Infrastructure Investment Plan can be found at Appendix B.

APPENDIX A – 2018/19 AGP Project Details

Broadland

Marriotts Way: Thorpe Marriott to Costessey – £100,000

To complete the improvement in access to and on the Marriott's way between Thorpe Marriott and Costessey. This will create an improved commuting route from Thorpe Marriott to the city and vice versa.

This is part of a programme of projects being developed through the Marriott's Way Implementation and Delivery plan, which have been informed by public and stakeholder consultation in 2015. It is now identified as the second highest scored project for delivery in the plan (Marriott's Way Improvement and Delivery Plan 2015-2015 – Appendices: p.90-91).

Community sports Hub proposal Horsford Manor site – £1,000,000

Norwich City Community Sports Foundation (CSF) has obtained the Anglia Windows sports site at Horsford Manor within Broadland District to develop a large scale "Community Hub" that will provide inclusive facilities for the growing community.

The vision of the CSF is to: *"Make a difference to people's lives by developing sustainable community facilities based on the needs of the local people"*.

The Community Hub will comprise: An indoor sports facility comprising full size 3G football pitch, full size sports hall, indoor gym and associated changing facilities, cafe, learning space, classrooms and office 10 sleeping pods to be used for residential training courses external spectator stand and associated parking, outdoor gym, alterations to access and infrastructure. It will be the only full 11aside indoor football pitch in the region that is open to the public.

A hybrid planning permission was granted for the Community Hub as described above in October 2017 and work has already commenced with pitches being laid out and internal renovations to the club housing being undertaken.

Thorpe Marriott Greenway - £105,000

This project focuses on two tree belts within Thorpe Marriott. The first is the belt that runs north to south on the western edge of Thorpe Marriott. The second is the tree belts to the north and west. The project will provide a strategic link from the Marriott's Way past a large residential area to the main pedestrian / cycle link (the green-bridge) over the NDR, which then gives the opportunity for further links to the north to Horsford and publicly accessible open spaces, and potentially to future links towards Hellesdon.

Marriott's Way: Surfacing Works (Drayton) - £85,000

This is part of a programme of projects being developed through the Marriott's Way Implementation and Delivery plan, which have been informed by public and stakeholder consultation in 2015. This project covers the section of Marriott's Way at the rear of the Tesco supermarket in the Drayton area (between Fakenham Road and Taverham Lane) and involves surface improvements and work to reduce the gradient of access ramps to allow better accessibility. Improvement of this section will fit into the ongoing surface

improvement between Norwich and Thorpe Marriott to improve cycle commuting into the city. The aim is to have the length of Marriott's Way between the City Centre and Thorpe Marriott adopted as highway to better facilitate its use as a cycling and walking commuter route.

Norwich

Green Pedalway – Earlham Road section – £560,000 over two years

The Green Pedalway project sees a comprehensive upgrade and extension to this strategic cycle route. In the west it will connect Easton to the city centre via Longwater, Lodge Farm, Bowthorpe and West Earlham. In the east it will connect Broadland Business Park to the city centre via Thorpe St Andrew and Thorpe Hamlet. It will comprise a set of improvements to cycling infrastructure along the route, complemented by the extension to 20mph areas in adjacent residential neighbourhoods and the installation of new monitoring equipment. This project element relates to improvements along Earlham Road.

UEA to Eaton Boardwalk extension – £30,000

The project is to extend the existing boardwalk which forms part of the Yare Valley Walk between UEA and Eaton/Cringleford. The boardwalk currently only extends half the length of the path from the UEA to Eaton/Cringleford. Planning permission would be required for the boardwalk.

Earlham Millennium Green Phase 3 – £25,000

Earlham Millennium Green (EMG) provides both an attractive area for the local community to enjoy and a variety of wildlife habitats. EMG also forms a valuable link for pedestrian access connecting Bowthorpe, West Earlham, the UEA and the Research Park. With the Three Score developments progressing, this route is likely to increase in importance and there are opportunities for improvements that would encourage more people to walk rather than use their cars. Facilities such as path surfacing and gates etc. will need to be more robust to handle this increased level of use and to ensure that the natural habitats and amenity value of EMG and the adjacent sites are not compromised. EMG and the adjacent areas, which include Earlham Marsh, are already well-loved by many local residents and a higher standard of amenities would increase the site's value to the community. A local scout pack has already expressed interest in using the site for leisure and educational activities.

The main pedestrian route through EMG has already been improved and upgraded under Phase 2 of a CIL funded improvement project. Under an earlier Phase 1, habitat improvements were undertaken including refurbishment and enlargement of the wildlife pond. The current proposals seek to build on this work by:

- Improving links to the main route through the site from Bowthorpe, and from West Earlham via George Fox Way;
- Refurbishing and improving existing but 'tired' entrance features such as estate fencing and gates;
- Provision of a new, high quality interpretative signboard;
- Replacing 3 worn-out timber pond and river dipping platforms with more durable recycled plastic versions; and
- Refurbishing an existing timber footbridge connecting EMG with Earlham Marsh

Yare and Wensum Valleys Link – £170,000 (for 19/20 onwards)

The River Wensum and Yare run close together in the west of the city between Marriott's Way near Gunton Lane and the Three Score development site. The link between the two river valleys is a recognised green infrastructure corridor and the route of the purple pedalway. Project delivery will commence in 18/19 and is programmed over 3 years. There is no CIL funding requirement until 19/20 as the 18/19 element consists of the S106-funded Bunkers Hill project.

Earlham and Mile Cross Library self-access improvements – £35,000 each

This project will introduce self-service technology that enables people to use the library outside the current opening times. The technology allows the library service to automatically control and monitor building access, self-service kiosks, public access computers, lighting, alarms, public announcements and customer safety. Each library will be able to have increased opening hours, making access to the library more convenient for current and new customers without an increase in staff costs. This is a great opportunity for libraries to be accessible and relevant to more people.

Refurbishment of Hewett Academy Swimming Pool

The request for CIL funding for this project is on hold as the Hewett Academy does not have the required resources to take forward this project in the foreseeable future. A further key issue is that the project costs have now doubled and would require a successful bid to Sport England for £150K match funding alongside other funding being identified.

South Norfolk

Wherryman's Way: Yare Valley Cycle Route – £23,000

Improve the Yare Valley Cycle Route, which follows the Wherryman's Way, through creating signage/route improvements. The costs include developing a management plan.

Costessey, Harleston and Loddon Library self-access improvements – £35,000 each

This project will introduce self-service technology that enables people to use the library outside the current opening times. The technology allows the library service to automatically control and monitor building access, self-service kiosks, public access computers, lighting, alarms, public announcements and customer safety. Each library will be able to have increased opening hours, making access to the library more convenient for current and new customers without an increase in staff costs. This is a great opportunity for libraries to be accessible and relevant to more people.

Area-wide

Green Infrastructure: Access for All – £150,000 across the area over five years

A number of trails across the Greater Norwich area have been audited for both power chair use and general accessibility and improvement works necessary to allow such access. To enable access for all users to Green Infrastructure trails across the area this project proposes the establishment of a fund to be used for a range of smaller scale accessibility improvements across a number of projects and areas.

Projects will need to demonstrate the wider benefits of any individual access improvements and will be considered and prioritised by the Green Infrastructure Programme Team before being approved by the Delivery Officers Group.

APPENDIX B – Investment Plan detail

APPENDIX B – Investment Plan detail

Project/Scheme Description	Total Estimated Scheme Cost (£,000)	Funding secured	Funding need					
				2018/19	2019/20	2020/21	2021/22	2022/22
East Norwich Gateway (Also included in GI section)	0			0	0	0		
Green Pedalway	9,600			500	60			
Transport Total				500	60	900	900	900
Little Plumstead Primary Extension to 315/420	4,500	400	350	400	1,800	1,800		
Hethersett High Extension	5,000	1,754	3,246	500	2,000	2,000		
Hellesdon New 420 Primary	6,400		6,400	500		780	2,560	2,560
New Bowthorpe Primary School					x			
Easton Primary Extension to 420	2,500		2,500		1,250	1,250		
Hingham Primary Mobile Replacement	900		221		450	450		
Cringleford New 420 Primary	6,400		6,400		1,280	2,560	2,560	
Long Stratton New 420 Primary	6,400		6,400		1,280	2,560	2,560	
North Norwich New Secondary and existing schools	26,000		26,000		2,600	2,600	2,600	2,600
Blofield New 420 Primary	6,400					x	x	x
Beeston Park New Free School 420 Primary #1	6,400		0			1,280	2,560	2,560
South of Salhouse Road New 420 Primary	6,400		6,400			1,280	2,560	2,560
Beeston Park New Free School 420 Primary #2	6,400		0					1,280
Education Total				2,000	2,000	2,000	2,000	2,000
MW: Thorpe Marriott to Costessey	100	-	100	100				
UEA to Eaton Boardwalk extension	30	-	30	30				
Wherryman's Way : Yare Valley Cycle Route	23	-	23	23				
Earlham Millennium Green Improvement Project: Phase 3	25	-	25	25				
Yare and Wensum Valleys Link (Norwich, Broadland and SNDC)	229	59	170	0	75	95		
Green infrastructure: Access for All				30	30	30	30	30
Thorpe Marriott Greenway	105		105	70	35			
MW: Surfacing Works (Tesco's)	85		85	85				
East Norwich Gateway (Also included in Transport section)	0			0	0	0		
MW: Inner Ring Road crossing	500		500		200	300		
Broadland Way Phase 3	150		150		150			
Hellesdon to Drayton Greenway	105		105		35	35	35	
Drayton to Horsford Greenway	105		105		35	35	35	
MW: Signage to Link Marriott's Way to the Adjacent Communities	20	10	10		20			
Wherryman's Way : Chedgrave Disabled Access Path	75		75		75			
Wherryman's Way: Strategic Link at Reedham	35		35		35			
MW: Biodiversity Management with Community Engagement	160	49	111		45	28	29	29
Kett's Heights	150	10	50		50			
MW: Crossing Points Improvement Project	89	10	79		89			
20 Acre Wood	90	10	80		90			
Yare Valley: Lodge Farm to Bawburgh Lakes connection	210	25	185		85	100		
Riverside Walk Missing Link Duke St to St George's St	300		300		300			
Wymondham - Tuttles Lane enhancements Phase 1	30		30			10	10	10
Burlingham Trails Cycling and Walking Routes	180		180			100	80	
Witton Run	170		170			170		
South Walsham GI Project	150		150			150		
West Brundall GI Project	425		425			75	350	
Boudicca Way cycle route	23		20			20		
Boudicca Way links to development	17		15			15		
MW: Hellesdon Station Area	210		210			105	105	
MW: Aylsham Gateway	30		30			30		
Kett's Country Trail	85		85			85		
Bishops Bridge to Whitefriars	50		50			25	25	
Carrow Bridge to Ber Street Woodland (Previously Boom Towers)	750		750			375	375	
Link from Blofield to Blofield Heath	125		125				125	
MW: Trim Track - Costessey	10		10				10	
MW: Reepham surfacing and biodiversity	100		100				100	
MW: Crossing over Taverham Road in Drayton	100		100				100	
Burlingham Trails Attractions and Facilities Project	240		240				80	80
South East Lingwood GI Connectivity	25		25					25
South Walsham Fen Access	35		35					35
Long Distance Cycle Loop	75		75					75
Marriott's Way & Wensum Riverside Walk Accessible Circular Walk 1; Train Wood	57		57					57
Marriott's Way & Wensum Riverside Walk Accessible Circular Walk 2; Wensum Local Nature Reserves	60		60					60
Local walking circulars with links to pubs, restaurants and cafes	35		35					35
GI Total				363	1,349	1,783	1,489	436

APPENDIX B – Investment Plan detail

Project/Scheme Description	Total Estimated Scheme Cost (£,000)	Funding secured	Funding need					
				2018/19	2019/20	2020/21	2021/22	2022/22
Community Sports Hub - Horsford	14,800	1,500	13,300	1,000				
Brook & Laurel Farm Community Building	500					500		
North Sprowston & Old Catton Community Space including library	2,400						2,400	
Land South of Salhouse Road Community Building	500					500		
Rackheath Community Building	500						500	
Great Plumstead Open Space / Community Orchard	25				25			
Strategic play (including 5 projects)	430				115	100	115	100
Harleston Library self access improvement	35			35				
Costessey Library self access improvement	35			35				
Loddon Library self access improvement	35			35				
Earlham Library self access improvement	35			35				
Mile Cross Library self access improvement	35			35				
Tuckswood self access improvement	43				43			
West Earlham self access improvement	43				43			
Hingham self access improvement	20				20			
New Swimming Pool and Sports Hall in Diss	10,000-12,000				1,600			
Artificial Grass Pitch in Diss	500				500			
New Sports Hall in Thorpe St Andrew	2,700					2,700		
Community Total				1,175	2,346	3,800	3,015	100

APPENDIX C – Growth Programme to date with amended NATS profile

GREATER NORWICH GROWTH PROGRAMME

Projects supported by borrowing highlighted in grey

Ref	Expenditure	Original Budget	Revised Budget	Actual spend	Other funding	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Agreed 2014/15 Growth Programme																		
GP1	Harrisons' Wood	(45)						(15)	(16)	(13)	(1)							
	Harrisons' Wood secured funding (S106)	45										45						
GP2	Danby Wood	(35)		(26)				(26)										
GP3	Marston Marsh	(30)		(25)				(24)	(1)									
GP4	Earlham Millennium Green - Phase 1	(15)		(3)				(3)										
GP5	Riverside Walk	(70)		(48)	(19)			(17)	(31)									
GP6	Marriott's Way - Phase 1	(60)		(60)				(60)										
GP7	Norwich Health Walks	(40)		(38)				(38)										
Agreed 2015/16 Growth Programme																		
GP8	Earlham Millennium Green - Phase 2	(66)							(12)	(54)								
GP9	Marriott's Way - Phase 2	(250)		(236)					(236)									
GP10 - 17	NATS Programme 2015/16 - 2019/20	(30,855)		(1,755)	(29,100)					(780)	(500)	(475)						
Agreed 2016/17 Growth Programme																		
GP19	St Faiths to Airport Transport Link	(1,000)							(20)		(150)	(415)	(415)					
GP21	Golden Ball Street public realm additional allocation	(500)								(500)								
GP22	Pink Pedalway - Heathgate	(250)		(150)	(100)				(150)									
GP23	Carrow Bridge to Deal Ground riverside path	(350)			(250)					(100)								
GP24	Colney River Crossing (NRP to Threescore)	(401)	(422)		(251)						(171)							
GP25	NDR	(178,450)			(138,450)			(40,000)										
GP26	Long Stratton Bypass	(20,000)			(10,000)						(5,000)	(5,000)						
Agreed 2017/18 Growth Programme																		
GP27	Lizard and Silfield Nature Reserves	(40)								(40)								
GP28	Costessey Circular Walks	(6)								(6)								
GP29	Barn Road Gateway	(40)								(20)	(20)							
GP30	Sloughbottom Park - Andersons Meadow	(250)								(150)	(100)							
GP31	Riverside Walk accessibility improvements	(200)								(20)	(180)							
GP32	Broadland Way - Green Lane North to Plumstead Road	(150)									(150)							
GP33	Strumpshaw Pit Circular Walk	(60)			(25)							(35)						
GP34	Cringford N&N strategic connections	(68)			(10)						(58)							
GP35	Riverside Walk: Fye Bridge to Whitefriars	(160)										(160)						
GP36	Castle Gardens	(1,472)			(1,072)					(75)	(75)							
GP37	Long Stratton Sports Hub	(2,545)			(2,045)					(500)								
GP38	Football pitch improvements	(100)								(25)	(25)	(25)	(25)					
GP39	Hales cricket and bowls clubhouse improvements	(160)			(130)					(30)								
GP40	Wymondham: new sports improvements	(800)			(550)					(250)								
GP41	Wroxham Library: self service improvements	(43)																
GP42	Plumstead Road Library: self service improvements	(85)			(33)					(120)								
GP43	Diss library: self service improvements	(25)																
GP44	Education									(2,000)								
	Cash reserve									(860)								
	Borrowing costs								(405)	(1,997)	(2,065)	(2,323)	(2,581)	(2,581)	(2,581)	(2,581)	(2,581)	(2,581)
TOTAL																		
	Pooled funding requirement of Growth Programmes excluding borrowing			(9,127)				(183)	(466)	(5,543)	(1,430)	(1,065)	(440)	-	-	-	-	-
	Pooled Funding Requirement including borrowing							(183)	(871)	(7,541)	(3,495)	(3,388)	(3,021)	(2,581)	(2,581)	(2,581)	(2,581)	(2,581)
Actual CIL Income																		
	Pooled CIL Projection					56	851	2,490	3,215	4,720	7,271	9,587	10,956	10,179	8,854	7,660	7,393	5,509
Yearly Pooled CIL Surplus / (Deficit)																		
						56	851	2,308	2,344	(2,821)	3,776	6,199	7,935	7,598	6,273	5,079	4,812	2,928
Cumulative Pooled CIL Surplus / (Deficit)																		
						56	907	3,214	5,558	2,736	6,513	12,712	20,647	28,245	34,518	39,597	44,409	47,337

APPENDIX D – Project Updates

Broadland

Early Delivery of Public Access to Harrison's Plantation, The Breck and Boar Plantation – Norfolk County Council's Natural Environment Team delivered a completed Woodland Management Plan in June 2015. This woodland management plan focused on Harrison's Plantation and the Breck. Further work relating to Boar Plantation has been deferred. Initial works to ensure that Harrison's Plantation and the Breck were suitable for public access were undertaken between August 2015 and January 2016. With the agreement of the current landowner, Persimmon Homes, the woods, now referred to as Harrison's Wood, were opened to the public in May 2016. At the time of writing, work to complete the formal transfer of land into public ownership is ongoing.

BRT Rackheath to City Centre (Salhouse Road / Gurney Road) including Cycling – A project brief for scheme development has been agreed with Norfolk County Council, initial feasibility design work is being undertaken during 2016/17.

Total scheme costs are currently forecast to be in the region of £5M. An initial £400k of LGF funding for scheme delivery in 2016/17 was identified within the 2015/16 GNGB Growth Programme. This funding will now be redirected to support the delivery of a junction and link road spur on Broadland owned land adjacent Plumstead Road. This will allow the potential for a road link to be completed between Salhouse Road and Plumstead Road. Such a link would reduce potential levels of traffic on Salhouse Road resulting from localised development which will support BRT on Salhouse Road / Gurney Road.

Whilst additional contributions for transport schemes along the Salhouse Road corridor may be secured as site specific mitigation from emerging nearby development proposals, it is likely that additional funds will be needed to fully implement bus and cycling proposals along this route. The need for additional CIL funding will be considered in subsequent investment plans.

Salhouse Road Walk / Cycle Route (including connections to Norwich City Centre via Mousehold Heath) – Project formed part of the larger programme of cycling improvements between the N&N Hospital and Salhouse Road, via Norwich City Centre and Mousehold Heath. The project itself comprised improved crossing facilities of Woodside Road and Salhouse Road for cyclists and pedestrians and a cycle path through Harrison's Plantation providing links to the Racecourse PH and Eastgate Place Development.

The programme was re-prioritised with Harrisons Plantation Woodland Park forming the termination of the cycling improvements. These improvements were completed during 2015/16.

The cycle path scheme through Harrison's Plantation has been deferred to be delivered through the S106 related to the White House Farm development. The current expectation is that this facility will be delivered in 2018.

North-East Norwich Link Road – The north-east Norwich link road between Broadland Business Park and Norwich Airport Industrial Estate will be predominately delivered through the development of permitted or allocated development sites in north-east Norwich.

Phase I of the Wroxham Road to Salhouse Road section of the route is now complete and work has now commenced on Phase II. A detailed scheme for the Broadland Business Park to Plumstead Road section is currently under consideration by Broadland District Council and Norfolk County Council. It is currently forecast that construction of this element will be begun in 2018/19.

Local Infrastructure Fund (LIF) bids have been accepted in principle by the GNGB to support delivery of further elements of the link road between Buxton Road and North Walsham Road and phase I of the link road east of North Walsham Road.

Further detailed proposals for the link road will be considered as part of future planning applications. In order to ensure the timely and well-ordered delivery of the link road it may be necessary to support the delivery of some elements of the road through other funding sources.

St Faiths Rd to Airport Transport Link – In total £1m of CIL funding was allocated to this project, split equally between 2016/17 and 2017/18. This funding has now been re-profiled.

Initial scheme feasibility ruled out the immediate possibility of a direct link between Hurricane Way and St Faiths Road as this would have likely required the relocation of an existing owner occupied business premises. Further scheme development has focused on the Meteor Close to Repton Avenue link, with initial traffic modelling completed by Mouchel in June 2016.

The modelling indicates that the completion of an all traffic link between Meteor Close and Repton Avenue would benefit existing traffic problems at the junction between Hurricane Way and St Faiths Road without significant impact on other road and junctions in Old Catton.

It is expected that consultation will take place in due course on the proposed construction of a link between Meteor Close and Repton Avenue. The completion of this link is not expected to utilise all of the allocated funds. However, it is considered judicious at this point to retain any unused element of the CIL funding allocation in order to ensure, as far as practicable, that a complete link to St Faiths Road, of an appropriate standard, can be delivered.

North Walsham Road Core Bus Route and Blue Pedalway Cycling – This scheme has now been deferred following initial feasibility and scheme development. Further scheme development for North Walsham Road as a sustainable transport corridor will be undertaken in due course and in coordination with the progress of the Beeston Park scheme.

Blue Pedalway - Chartwell Road – St Clements Hill – Spixworth Road Improved Cycle Crossing Facilities and associated works - £120k of CIL funding was transferred to this

scheme in the 2016/17 AGP from a previous commitment for a toucan crossing and associated work at School Lane / Chartwell Road / Denton Road. This transferred funding forms part of the match funding associated with the second round of DfT City Cycle Ambition Grant funding for improvements along the Blue Pedalway between Sprowston and Cringleford via Norwich City Centre. The overall cost of this scheme is forecast to be approximately £400k.

The details of the scheme are currently being developed by the Transport for Norwich Team and on-site works are planned to be begun, and completed, in 2018.

Neighbourhood Cycle Enhancements Along Former Route of Blue Pedalway – School Lane / Chartwell Road / Denton Road – Toucan Crossing and associated works – £120k of funding for the implementation of this scheme in 2015/16 was identified in the 2015/16 GNGB Growth Programme. This was reallocated to improve crossing facilities of the outer ring road at St Clements Hill / Chartwell Road / Spixworth Road as part of the delivery of cycling improvements enabled by the second round of DfT Cycle City Ambition Grant funding, see above.

Notwithstanding the above a further grant of £120k was made in the 2016/17 AGP for the School Lane/ Chartwell Road/ Denton Road scheme on the basis that, enhancements for pedestrians and cyclists in this location remain an important local infrastructure priority. Subsequent scheme development work has however identified that an appropriate improvement cannot be delivered within this budget. The scheme has not been deferred indefinitely.

Improved Cycle Crossing of Cannerby Lane / Wroxham Road / Cozens Hardy Road – Scheme development deferred and its rescheduled commencement date is pending.

Broadland Way (Thorpe St Andrew to Wroxham Cycle and Pedestrian facilities) – Feasibility / scheme development was undertaken during 2015/16. Funding was agreed in the 2017/18 AGP for £150k to deliver a section of the scheme between Plumstead Road and Green Lane.

Broadland Business Park Rail Halt – The potential for a station at the Business Park has been investigated as part of a larger study for the Bittern Line. The Study has now completed and has concluded that the business case for improving the Bittern Line is sufficiently strong as to justify further work and research.

Now that an evidence base has been gathered on the needs and feasibility, discussions have begun with partner organisations, including the rail industry, on the merits of a Bittern Line Improvements Project Board. Initial feedback has been positive and discussions are continuing to develop in accordance with Network Rail's Governance for Railway Investment Process (GRIP).

Broadland Growth Triangle Green Infrastructure Delivery Plan – Norfolk County Council's Natural Environment Team delivered the feasibility study as proposed during 2015/16. This study will be used to inform future priorities for green infrastructure investment and as the basis of future negotiations with developers on planning applications.

East Broadland Green Infrastructure Delivery Plan – Norfolk County Council's Natural Environment Team delivered the feasibility study as proposed during 2015/16. This study will be used to inform future priorities for green infrastructure investment and as the basis of future negotiations with developers on planning applications.

North-West Forest and Heath Green Infrastructure Delivery Plan – Norfolk County Council's Natural Environment Team were formerly engaged to produce a feasibility study during 2015/16. This work was initially deferred but is now being developed by the Broadland Planning Policy Team. The Plan is expected to be completed in 2018. Where early project opportunities have been identified, and have been well received by stakeholders, these are already being progressed.

Thorpe Ridge: Protection and Enhancement of Woodlands and Provision of Public Access – Norfolk County Council's Natural Environment Team were formerly engaged to produce a feasibility study during 2015/16. This work has, however, now been deferred and whilst its rescheduled commencement date is pending funds remain in place to commission this work.

Strumpshaw Pit Circular Walk: There is potential to expand the dog walking capabilities of Strumpshaw Pit, which is owned by Norfolk County Council. This could be achieved through additional parking, which would increase the distance that dog walkers travel. In addition, cycle rack provision will provide for other users. The existing site includes a circular walk around a closed landfill site with various wildflowers growing and it is commonly used by dog walkers, but is not fully accessible. Project delivery is linked to the release of associated S106 funds from development and this has been delayed. It is anticipated that the CIL funded element of the project will now commence in 2019/20

Wroxham Library self-access improvements: This project will introduce both public customer toilets and self-service technology that enables people to use the library outside the current opening times. The technology allows the library service to automatically control and monitor building access, self-service kiosks, public access computers, lighting, alarms, public announcements and customer safety. Each library will be able to have increased opening hours, making access to the library more convenient for current and new customers without an increase in staff costs. This is a great opportunity for libraries to be accessible and relevant to more people.

Norwich

Riverside walk between Fye Bridge and Whitefriars: This project aims to complete a key stretch of the riverside walk in the city centre, between Fye Bridge and Whitefriars Bridge on the north side of the river, some of which has already been delivered through new development. The project is not likely to progress until several key issues are resolved, so is proposed to be delayed for at least a couple of years, and to be kept under review:

- there is a need for maintenance/ management of this section of riverside walk to be in place from day one but this currently cannot be funded from CIL and there is no alternative funding; and
- there are some concerns about deliverability of the scheme raised through the River Wensum Strategy consultation. Feasibility investigations are required to

establish more detailed costs and deliverability, including engagement with residents, but there is currently no funding for this work.

Riverside walk accessibility improvements: The project aims to enable the use of the Riverside Walk (between New Mills and Carrow Bridge) by all, including access measures on and adjacent to the walk, and improved signage and waymarking linking the river with the city centre and other key attractors. This project is underway and is broadly on target. Progress to date includes prioritisation of areas requiring improvement and initial survey work.

Earlham Millennium Green: Phases 1 and 2 are now complete.

Marriott's Way: Improvements to Marriott's Way within the urban area to encourage commuting by bicycle and on foot. Phases 1 and 2 completed. A £250,000 project to improve the section between Andersons Meadow and Sloughbottom Park to increase safety, comfort and personal security is being developed for implementation by March 2019. Works include path widening/realigning, providing street lighting, improving an adjacent storm drain, vegetation management, tree planting and drainage improvements. Another project to improve the start of the path at Barn Road is being developed using £40,000 for implementation by July 2018.

Colney River Crossing (NRP to Threescore): Creation of a walking route between Bowthorpe and Norwich Research Park through the construction of a new footbridge and improvement of the connecting footpath from Bowthorpe Southern Park to Bowthorpe Centre and the associated open space at The Runnel. CIL funding was initially awarded in 2016/17 with an additional £21,000 approved in 17/18. The rest of the money is being supplied by the city council through developer funding. The bridge, which straddles the administrative boundaries of South Norfolk and Norwich City, has received planning permission from both councils. A bridge contractor has been selected and the bridge is due to be completed in summer 2018. The improvements to The Runnell open space are under construction with completion due in spring 2018.

Castle Gardens: Refurbishment of Castle Gardens to boost visitor numbers and enjoyment at a capital cost of £220,000, comprising £150,000 CIL and £70,000 S106. This will complement the Castle Keep project. A comprehensive plan of potential improvements has been drafted that will be prioritised against available funding. Initial works to vegetation planned for winter 2018.

Golden Ball Street/Westlegate

Phase 1 works completed

Phase 2 works completed

Eaton Interchange: The Eaton interchange project has received all its' necessary approvals. However in order to ensure that disruption is kept to a minimum during construction the project has been deferred until Summer 2018/ Work are expected to be complete by September 2018

Football Pitch Improvements: Football pitch improvement works at Eaton Park, Sloughbottom Park, Britannia Barracks and Fountain Ground including drainage improvements, improved grass species and improved goal facilities through the provision of new posts, nets and additional ground sockets. This will permit moving the pitches annually to prevent excessive wear, improving the playability of the pitches and increasing capacity.

Plumstead Road Library self-access improvements and car parking: This project will introduce self-service technology that enables people to use the library outside the current opening times. The technology allows the library service to automatically control and monitor building access, self-service kiosks, public access computers, lighting, alarms, public announcements and customer safety. Each library will be able to have increased opening hours, making access to the library more convenient for current and new customers without an increase in staff costs. This is a great opportunity for libraries to be accessible and relevant to more people. The proposal is to also provide car and bike parking (including disabled parking) for customers using Plumstead Road Library although this is a secondary priority.

South Norfolk

The following projects have been identified in previous Growth Programmes to date:

Norfolk & Norwich Hospital Health Wood Walks – a footpath through the tree-belt surrounding the Norfolk and Norwich University Hospital – was completed in autumn 2015, and delivered under budget

Long Stratton Bypass & Hempnall crossroads Junction – the Long Stratton Area Action Plan was adopted in May 2016, confirming the allocation of at least 1,800 homes and a corridor for the bypass. A bid for National Productivity Investment Funding recently secured £3.05m to part fund the delivery of the Hempnall Crossroads improvement. Further pre-application discussions and work with the landowners/developers promoting the delivery of the allocated development and bypass continues, with two planning applications expected to be submitted early in 2018.

A47 improvements (particularly Thickthorn junction improvements and Easton-North Tuddenham dualling) – funded and delivered by Highways England – Highways England consulted on initial options in 2017. Preferred solutions were announced in autumn 2017, with further informal consultation with key stakeholders. The next stage of statutory consultation will be undertaken in 2018 and construction estimated to start in 2021, should the schemes be approved by the Secretary of State.

Longwater junction and Easton strategy improvements (including walking and cycling) – Improvements are required in the Longwater and Easton area to resolve existing transport issues and accommodate traffic arising from planned growth. Various smaller scale measures have been identified in the Longwater and Easton Transport Strategy (May 2014) and a number have been completed in conjunction with development of a new retail store and nearby housing development; these include a new left turn lane from

William Frost Way to Dereham Road and widening of the Dereham Road itself. Further improvements are planned as part of the large-scale housing development at Easton.

Two larger-scale projects, an A1074 (Dereham Road) to Longwater (Ernest Gage Avenue) link road and/or a second bridge over A47, have been identified as necessary to enable the Longwater junction to operate satisfactorily in the future. The preferred solution, which is likely to be cheaper and easier to deliver, is the link road; however, as yet no funding source for this work has been identified.

Marriott's Way improvements – various improvements to Marriott's Way have been agreed in previous AGPs. In South Norfolk, improvements (to the value of approximately £100,000) to the cycle and footpath section between Gunton Lane and Red Bridge Lane were funded by CIL. Re-surfacing was carried out in 2016.

Colney River Crossing (NRP to Threescore) – see above

Other Norwich Area Transportation Scheme Projects – NATS projects within South Norfolk were agreed as part of the 2015/16 Growth Programme (as part of a four-year programme running from 2015-19), with LGF money secured. A planning application has recently been submitted for the Roundhouse Way Bus Interchange and work is ongoing on the Cycle Link Extension Hethersett-Wymondham. Cycle improvement works between the B1172 and B1108 (Watton Road) are to be delivered in phases through developer contributions from development at Hethersett and Norwich Research Park. There has been no further work on bus priority associated with southern approach to the A140/A47 Harford junction.

Protection/enhancement of the Lizard and Silfield Nature Reserve, Wymondham: To protect and enhance the Lizard and Silfield Nature Reserve by the creation of alternative green infrastructure routes (such as new permissive footpaths) for recreational access. The project will identify and agree new routes, which will be developed as appropriate. Necessary infrastructure such as stiles, fencing, signage/way marking, hedgerow planting/restoration and interpretation/localised publicity will be provided to encourage and manage use of the network.

Improved Connectivity - Costessey Circular Walks: The project is part of the Marriotts Way Improvement and Delivery Plan, specifically aimed at improving public access to Marriott's Way from surrounding residential areas in Costessey, through one or two additional (permissive) footpaths, which would allow new signage and promotion of circular walks in Costessey based on Marriott's Way. There is no requirement for surface improvement on the additional permissive path/s, which measure approximately 200m and 180m (and are approximately 3m wide). In order to bring forward the permissive path/s, the landowner would require stock-proof fencing along approximately 180m of his land which borders Marriotts Way. A new gate would be needed at each end of the permissive path/s, and signage to promote their use.

Cringleford N & N Strategic Connections: Green infrastructure projects of various types to link N&N Hospital, Yare Valley Walk in Cringleford, and possibly along the A47 corridor: A) a footpath between N&N hospital walk and application to the west of Newfound Farm (around 365m); B) habitat connections between N&N hospital tree belt and boundary

treatment for application to the west of Newfound Farm; C) a footpath through Cringleford Wood (around 600m); D) improvement to CWS in Cringleford (details to be confirmed). This would supplement GI to be delivered by permission 2013/1494 and likely to be delivered by application 2013/1793, shown as a green dashed line on the map.

Long Stratton Sports Hub: The project aims to bring together a number of facility-providing partners (South Norfolk Council, Long Stratton High School and Long Stratton Parish Council) to improve the sport and leisure facility stock in the village in anticipation of significant housing growth. It will create a new sport and leisure 'Hub' across three adjacent sites and provide new and enhanced facilities that are fit for purpose and better suited to the current and future facility needs of local residents. Management will be shared across the three sites, resulting in economies of scale and efficiencies in service delivery. A match funding decision for swimming pool from Sport England was due in Dec 2017.

Hales cricket and bowls clubhouse improvements: There is a need for a replacement pavilion to serve Loddon and Hales Cricket Club and Hales Bowls Club on their shared site on Green Road, just off the A146 to the south-east of Loddon. The latter had been forced to relocate to the current venue as a result of housing development on their previous site off Yarmouth Road in Hales. The proposed new pavilion will give both clubs a permanent home in spaces that meet their respective needs, allowing them to develop and grow participation across a range of ages.

Wymondham: New sports improvements (artificial grass pitch for football/rugby): Ketts Park in Wymondham has been identified as being a location that would be suitable for a sports hub, the provision of which can ensure that there are economies of scale in outdoor sports delivery and that clubs can benefit from shared and jointly managed facilities, so it is proposed to provide a new full-size, floodlit artificial grass pitch (AGP) on the site which would take advantage of existing infrastructure. With tennis also being available on the Ketts Park site the argument for creating one of these hubs is strengthened, and significant gains in sporting participation could be achieved. With the expected growth in demand for pitches in Wymondham due to the forthcoming housing, the carrying capacity of a full-size AGP will help to ensure that the quality of existing natural turf pitches (whose drainage will be improved as part of this project) is not compromised in the future.

Diss Library self-access improvements: This project will introduce self-service technology that enables people to use the library outside the current opening times. The technology allows the library service to automatically control and monitor building access, self-service kiosks, public access computers, lighting, alarms, public announcements and customer safety. Each library will be able to have increased opening hours, making access to the library more convenient for current and new customers without an increase in staff costs. This is a great opportunity for libraries to be accessible and relevant to more people.

APPENDIX E

Table 1 – NATS original

Table 2 – re-profiled NATS

Table 1

APPENDIX E - GREATER NORWICH GROWTH PROGRAMME

Projects supported by borrowing highlighted in grey

Ref	Expenditure	Original Budget	Actual spend	Other funding	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26
Agreed 2014/15 Growth Programme																	
GP1	Harrisons' Wood	(45)					(15)	(16)	(13)	(1)							
	Harrisons' Wood secured funding (S106)	45									45						
GP2	Danby Wood	(35)	(26)				(26)										
GP3	Marston Marsh	(30)	(25)				(24)	(1)									
GP4	Earlham Millennium Green - Phase 1	(15)	(3)				(3)										
GP5	Riverside Walk	(70)	(48)	(19)			(17)	(31)									
GP6	Marriott's Way - Phase 1	(60)	(60)				(60)										
GP7	Norwich Health Walks	(40)	(38)				(38)										
Agreed 2015/16 Growth Programme																	
GP8	Earlham Millennium Green - Phase 2	(66)						(12)	(54)								
GP9	Marriott's Way - Phase 2	(250)	(236)				(236)										
GP10 - 17	NATS Programme 2015/16 - 2019/20		(1,230)						(730)	(500)	(475)						
Agreed 2016/17 Growth Programme																	
GP19	St Faiths to Airport Transport Link	(1,000)							(150)	(425)	(425)						
GP21	Golden Ball Street public realm additional allocation	(500)							(500)								
GP22	Pink Pedalway - Heathgate	(250)	(150)	(100)				(150)									
GP23	Carrow Bridge to Deal Ground riverside path	(350)		(250)					(100)								
GP24	Colney River Crossing (NRP to Threescore)	(401)		(251)						(150)							
GP25	NDR	(178,450)		(138,450)				(40,000)									
GP26	Long Stratton Bypass	(20,000)		(10,000)						(5,000)	(5,000)						
Agreed 2017/18 Growth Programme																	
GP27	Lizard and Silfield Nature Reserves	(40)							(40)								
GP28	Costessey Circular Walks	(6)							(6)								
GP29	Barn Road Gateway	(40)							(20)	(20)							
GP30	Sloughbottom Park - Andersons Meadow	(250)							(150)	(100)							
GP31	Riverside Walk accessibility improvements	(200)							(20)	(180)							
GP32	Broadland Way - Green Lane North to Plumstead Road	(150)								(150)							
GP33	Strumpshaw Pit Circular Walk	(60)	(25)							(35)							
GP34	Cringleford N&N strategic connections	(68)	(10)							(58)							
GP35	Riverside Walk: Fye Bridge to Whitefriars	(160)									(160)						
GP36	Castle Gardens	(1,472)	(1,072)						(75)	(75)							
GP37	Long Stratton Sports Hub	(2,545)	(2,045)						(500)								
GP38	Football pitch improvements	(100)							(25)	(25)	(25)	(25)					
GP39	Hales cricket and bowls clubhouse improvements	(160)	(130)						(30)								
GP40	Wymondham: new sports improvements	(800)	(550)						(250)								
GP41	Wroxham Library: self service improvements	(43)															
GP42	Plumstead Road Library: self service improvements	(85)	(33)						(120)								
GP43	Diss library: self service improvements	(25)															
	Education								(2,000)								
	Cash reserve								(860)								
	Borrowing costs							(405)	(1,997)	(2,065)	(2,323)	(2,581)	(2,581)	(2,581)	(2,581)	(2,581)	(2,581)
TOTAL																	
	Pooled funding requirement of Growth Programmes excluding borrowing	(9,056)					(183)	(446)	(5,643)	(1,719)	(1,040)	(25)	-	-	-	-	-
	Pooled Funding Requirement including borrowing						(183)	(851)	(7,641)	(3,784)	(3,363)	(2,606)	(2,581)	(2,581)	(2,581)	(2,581)	(2,581)
Actual CIL Income					56	851	2,490	3,215									
Pooled CIL Projection									4,720	7,271	9,587	10,956	10,179	8,854	7,660	7,393	5,509
Yearly Pooled CIL Surplus / (Deficit)					56	851	2,308	2,364	(2,921)	3,487	6,224	8,350	7,598	6,273	5,079	4,812	2,928
Cumulative Pooled CIL Surplus / (Deficit)					56	907	3,214	5,578	2,656	6,144	12,368	20,718	28,316	34,589	39,668	44,480	47,408

IIF-supported NATS Programme

Re-profiled December 2017

CIL Funding Profile	0	0	(20)	(1,430)	(915)	(890)
CIL Drawdown Profile			(20)	(1,430)	(915)	(890)

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Table 3 – supporting commentary

The table below provides explanation around those projects which are no longer detailed in the IIF-supported NATS Programme.

Salhouse Road Sustainable Transport Corridor	
Scheme identification work complete and no viable schemes identified. Growth Fund monies reallocated to the Plumstead Road roundabout scheme.	
Salhouse Road Walk/Cycle Route (Pink Pedalway)	Project completed
School Lane/ Chartwell Road/ Denton Road Toucan Crossing and associated works (Blue Pedalway)	Project not progressed. IDB approved reallocation of IIF to North Walsham Road projects.
North Walsham Road Transport Corridor	
Feasibility work was completed and a number of schemes identified. However, elements of the route are likely to be delivered by development and there are no plans to deliver works on this corridor in advance of this.	
Yarmouth Rd Sustainable Transport Corridor	
Some feasibility works were completed 2010/11 and at. There are no plans for delivery on this corridor at present.	
Lower Clarence Road	Feasibility work has been undertaken on a contraflow cycle lane in this location – this work has been incorporated into the Green Pedalway project
Rail Station Cycle Hub	Cycle hire has been introduced at the station by train operator Greater Anglia.
A11 Sustainable Transport Corridor	
BRT / Blue Pedalway:	There has been investment along this corridor in terms of bus stop infrastructure. Cycle improvements funded by LGF are being undertaken in 16/17 and 17/18.
Thickthorn Scheme	This is a Highways England scheme being funded for delivery in 2020.
Dereham Road Sustainable Transport Corridor	
Extension to Longwater/Easton Scheme Identification (BRT/Green Pedalway)	Some preliminary feasibility work has been undertaken
Longwater	Further information being sought
BRT Fakenham Road/Drayton High Road	
Works not undertaken. Feasibility works need to be prioritised against other corridors	
A140 Corridor	
Yellow Pedalway – Lakenham Way Improvements	Not going ahead due to land ownership issues



Equality Impact Assessment

Name of Officer completing assessment:
Paul Harris

Date of Assessment: 22/01/2018

What is the proposed Policy?

Joint Five Year Investment Plan, January 2018

1. Which protected characteristics does this Policy impact: (please tick all that apply)

Age	☐	Sex	☐	Pregnancy/Maternity	☐
Disability	☒	Sexual Orientation	☐	Gender Reassignment	☐
Race	☐	Civil Partnership/Marriage	☐	Religion or Belief	☐
Health	☒	Rurality	☐	Deprivation	☒
				None of the above	☐

2. What do you believe are the potential equalities impacts of this policy?

Please include:

- Any other groups impacted not detailed above
- Partnership organisations worked with in the development of this policy
- Evidence gathered to inform your decision
- Where you have consulted, Who and How this has informed the decision/policy

Note: Impacts could be positive and/or negative and impact groups differently

The Greater Norwich Growth Board Joint 5 Year Investment Plan, January 2018 includes 5 specific projects that are relevant to Broadland. Projects directly related to Norwich and South Norfolk will be separately considered, in terms of EQIA, by those Councils.

Three of the five projects (Improvements between Thorpe Marriott and Costessey, Surfacing Works and Thorpe Marriott Greenway) in Broadland either directly improve the Marriotts Way, or provide improved foot and cycle access links to it. The improvements will primarily comprise enhancing or providing new surfacing. Such works will be directly beneficial in terms of **health** and wellbeing by improving the quality and usability of elements of this long distance walking and cycling link between Norwich and Reepham. The long distance nature of Marriott's Way means that it provides recreational connections to both the urban and rural area. As a consequence the ongoing usability of the Marriott's Way as a whole provides health and well-being benefits in terms of the **rurality** aspect of equality, albeit that these specific scheme focus on the part of Marriott's Way nearer to or within the urban area.

The "Access for All" project is an investment pot that is specifically designed to increase access to existing trails across Greater Norwich for different users, particularly those with physical impairments. As a consequence This project has benefits in term of **health** and **disability**. The specific projects that will be taken forward under this scheme are not yet determined but project specific equalities implications will be considered, as necessary, when specific projects are identified for funding.

The contribution to CSF Sports Hub will help to deliver its proposals for a new sports facility comprising full size 3G football pitch, full size sports hall, indoor gym and associated changing facilities, cafe, learning space, classrooms and office 10 sleeping pods to be used for residential training courses external spectator stand and associated parking and an outdoor gym.

Norwich City Community Sports Foundation (CSF) is the official charity partner of Norwich City Football Club and helps over 38,000 people every year achieve their goals through sport, supporting some of the most disadvantaged, disabled and talented people across Norfolk.

The Foundation's vision is to help people achieve their goals by delivering quality, innovative services through football and sport. If delivered, the Sports Hub proposal will directly benefit **health** by increasing participation in sport and creating opportunities for people with obesity, poor health and mental health. It will directly benefit **disability** by encouraging more people with disabilities to participate and gain qualifications in sport, health and fitness. It will directly benefit **deprivation** by supporting the long term unemployed and increase social mobility for young people.

3. How is it proposed that any identified impacts are mitigated?

Please include:

- Steps taken to mitigate, for example, other services that may be available
- If you are unable to resolve the issues highlighted during this assessment please explain why
- How impacts will be monitored and addressed?
- Could the decision/policy be implemented in a different way?
- What is the impact if the decision/policy is not implemented?

The identified impacts are wholly positive, as they provide variously provide benefits in terms of the health, disability and deprivation dimensions of equalities.

The principle risks in terms of achieving these benefits would be non-delivery of the specified project, or cost issues diminishing the quality of a scheme e.g. using an unbound surface rather than a bound surface. Each of the projects will be project managed to ensure the best possible outcome. Where Broadland is not the project lead/manager, e.g. the CSF Sports Hub, Broadland will continue to positively engage with the delivery lead to ensure that the best possible outcome is achieved.

Signed by evaluator:

Signed by responsible head of department:

Please send your completed forms to victoria.parsons@broadland.gov.uk to be reviewed and stored in accordance with our legal duty. You may also wish to contact the Housing, Health & Partnerships Officer if at any time you need assistance filling in your assessment.

NORFOLK STRATEGIC PLANNING FRAMEWORK

Portfolio Holder: Planning
Wards Affected: All

1 SUMMARY

- 1.1 A proposed Norfolk Strategic Planning Framework has been produced by the Norfolk Strategic Planning Group following consultation (see Appendix 1). This is being considered for approval / endorsement by all the local planning authorities in Norfolk. It is also proposed that the work of the Norfolk Strategic Planning Group continues, in order for the Framework and related work to progress.

2 KEY DECISION

- 2.1 This is a key decision and has been published in the Forward Plan.

3 BACKGROUND

- 3.1 The Norfolk Strategic Planning Framework (NSPF) is a document that is being produced by all the planning authorities in Norfolk, together with the involvement of relevant bodies such as the Environment Agency. The Framework sets out guidelines for strategic planning matters across the County and beyond, and demonstrates how the authorities will work together under the Duty to Co-operate through a series of potential agreements on planning related topics. A draft Framework was put together by officers from the authorities under the oversight of a Member level group comprising representatives from all the authorities. This Council's representative is the Planning Portfolio Holder. The draft Framework was consulted on and comments received were considered and amendments made where appropriate. A summary of the consultation comments and response to each of these is attached (Appendix 2). The Council submitted comments on the consultation welcoming and supporting the production of the Framework and supporting the proposed agreements in principle, subject to the results of the consultation.
- 3.2 Although the Framework will not be a statutory planning document, it sets out strategic matters to be taken account of in the production of Local Plans. It is envisaged that each Council will then approve the final Framework and it will then be used to guide the LPAs in their strategic planning work. It is also envisaged that the Framework will be monitored and reviewed as necessary in the following years.

- 3.3 The Framework sets out a proposed Spatial Vision and shared objectives for the Norfolk authorities, having regard to the main spatial planning issues of population growth, housing, economy, infrastructure and environment. Related to these, a number of proposed 'agreements' explain how the local planning authorities will seek to deal with the matters through their spatial planning role. Therefore, although the Framework is not a planning document in its own right, it can be seen as a guide for future planning work.
- 3.4 The Framework is also now subtitled an 'Emerging Statement of Common Ground'. This reflects the Government's proposal to introduce a requirement in the revised National Planning Policy Framework, that all local planning authorities should produce a statement of common ground setting out cross boundary matters, including the housing need for the area, distribution and proposals for meeting any shortfalls. Fortunately, the work on the Framework has pre-empted this requirement, and it is envisaged that the Framework (amended if necessary) will be able to become a key part of the required Statements of Common Ground. Accordingly, the Framework is seen as an iterative document that will evolve and be updated to reflect changing circumstances. Also, it is likely that there will continue to be opportunities for joint-working amongst the LPAs on issues under the Framework.

4 PROPOSED ACTION

- 4.1 It is proposed that the Council approves the Framework and agrees to being a 'signatory' to it. To be effective, and particularly for it to become part of a future Statement of Common Ground, it will need to evolve and address new issues that arise. Consequently, it is also proposed that the Norfolk Strategic Planning Group (Member forum) continues and works on adapting the Framework as necessary in the coming months, and oversees other work related to this, e.g. evidence studies. The Terms of Reference for the Group are attached (Appendix 3).
- 4.2 To-date, the work on the Framework has been funded by the constituent authorities in Norfolk, including Project Management support. It is proposed that this continues on a similar basis for the next two years. This would be at a contribution from the Council of £10,000 per year. The identified workstreams for the group are set out in Appendix 4 of this report.

5 RESOURCE IMPLICATIONS

- 5.1 The main resource implication is the contribution of £10,000 per year for two years to the work of the Norfolk Strategic Planning Forum, together with officer time for the work (within existing staff resources) and the attendance of the Portfolio Holder at the Forum meetings, if it is agreed that this continues. A figure of £10,000 for this has been included in the 2018/19 budget.

6 LEGAL IMPLICATIONS

- 6.1 The Framework will be a key element in demonstrating that Norfolk's local planning authorities are working together as required under the 'Duty to Co-operate' set out in the Localism Act 2011.

7 RISK IMPLICATIONS

- 7.1 The Framework may not be approved by all the constituent authorities, or further amendments may be sought. In terms of future work the identified work-streams may need to be amended or not taken forward e.g. if not agreed with by individual authorities.

8 EQUALITIES IMPLICATIONS

- 8.1 An Equality Assessment report has been produced which shows that there should be no detrimental impact on equality issues (attached at Appendix 5).

9 CONCLUSION

- 9.1 It is suggested that the Norfolk Strategic Planning Framework be approved by the Council and that the Council continues its involvement in the Norfolk Strategic Planning Forum.

10 OPTIONS

- 10.1 The Cabinet has the following options to RECOMMEND to Council:

to

- (1) approve the Norfolk Strategic Planning Framework and continue the Council's involvement in the Norfolk Strategic Planning Forum;

or

- (2) not approve the Norfolk Strategic Planning Framework and cease the Council's involvement in the Norfolk Strategic Planning Forum;

or

- (3) any other course of action Cabinet deems appropriate.

Phil Courtier
Head of Planning

Background papers

None

For further information on this report call John Walchester on (01603) 430622 or email john.walchester@broadland.gov.uk.

Norfolk Strategic Planning Framework

Shared Spatial Objectives for a Growing County and Emerging Statement of Common Ground

December 2017



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- Waveney District Council
- West Suffolk Council
- Fenland District Council
- East Cambridgeshire District Council
- South Holland District Council
- Natural England
- Environment Agency
- Anglian Water
- New Anglia Local Enterprise Partnership
- Greater Cambridge Greater Peterborough Local Enterprise Partnership
- Great Yarmouth & Waveney CCG
- North Norfolk CCG
- Norwich CCG
- South Norfolk CCG
- West Norfolk CCG

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Section 1 – Introduction

1.1 Purpose of this Document

Norfolk's Local Planning Authorities (including Norfolk County Council) have a long track record of working together to achieve shared objectives. In early 2015 they, working through its strategic planning member forum, agreed to formally cooperate on a range of strategic cross-boundary planning issues through the preparation of this Norfolk Strategic Planning Framework (previously called the Norfolk Strategic Framework and referred to in this document as the NSF).

The aim of producing the framework is to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of future Local Plans;
- Demonstrate compliance with the duty to co-operate and consistency with the National Planning Policy Framework (while recognising the latter is due to be revised shortly);
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high level plans (such as the Strategic Economic Plan); and
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

The project has been underway since October 2015. Four working groups have been established to pull together a shared evidence base on housing, employment, infrastructure and delivery issues. The working groups consist of Local Authority staff assisted by other organisations including the Environment Agency, Natural England, Anglian Water, UK Power Networks, Homes and Communities Agency and the New Anglia Local Enterprise Partnership. Our thanks is extended to all those who have contributed to this work which has informed this framework.

For further information on the work of the Norfolk Strategic Planning Member Forum and about the process for preparing this strategy please see the Forum's website:

www.norfolk.gov.uk/nsf

This document is intended to be strategic in nature. It provides only an overview of background information and shared research. A wealth of information has been produced by the working groups; however a decision has been made to keep this document concise and to concentrate on the matters where there is a clear need for agreement between the Local Authorities. We acknowledge that not all factors have been considered, but where appropriate, relevant additional information has been highlighted. Mitigation of certain issues does not diminish their importance or value.

Details of the lead contact in each local Council on strategic planning matters are included in Appendix 1.

1.2 Changes to the document since consultation

A draft of this document was published for extensive public consultation over the summer of 2017. The consultation closed on 22nd September and a significant number of representations were received during the period. These representations have all been analysed and a considerable number of changes to this document have been made in response. Details of the representations made and responses to them can be seen at:

<https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/>

Shortly before the consultation on the NSF closed the government published consultation proposals titled “Planning for the right homes in the right places”¹. This document potentially has some significant implications for the NSF which have been reflected in this version of the document. In particular the government consultation proposed:

- a) a detailed methodology of a proposed standard approach to assessing housing need across local authority areas which had been previously proposed in the housing white paper ²as a measure to make the assessment of local housing need simpler, quicker and more transparent and therefore speed the production of local plans; and
- b) to introduce a requirement in the revised National Planning Policy Framework³ that all local planning authorities should produce a statement of common ground setting out cross boundary matters, including the housing need for the area, distribution and proposals for meeting any shortfalls.

Both these proposals have the potential to significantly impact upon the NSF as the draft document already addressed issues of housing need and also did much of what the government are proposing to introduce by introducing the requirement for producing a statement of common ground. In the consultation document the government stressed that “The statement of common ground is not intended to replicate any stage of the plan-making process, nor should it be an additional burden on local planning authorities. Critically, we do not want this proposal to disrupt existing joint working arrangements where these are effective.”⁴

Taking this steer from government the authorities are of the view that the NSF should effectively become the statement of Common Ground for Norfolk and a number of amendments have been made to the NSF so it is clear that this is the intention and to comply with the detail of what was proposed by government in the consultation document. Clearly as the government proposals have only been published for consultation at this stage it will be necessary to keep this decision under review and change the NSF further during 2018 if this is deemed necessary in order to comply with the requirements of the revised national Planning Policy Framework when it is finalised.

¹See <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

² <https://www.gov.uk/government/collections/housing-white-paper>

³ Due to be produced by Spring 2018

⁴ See para 65 of the consultation document

1.3 Timescale for and coverage of the Document

This document relates to the whole of Norfolk and all Norfolk authorities which include:

Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, Norwich City Council, North Norfolk District Council, South Norfolk Council and Norfolk County Council.

All Norfolk Local Planning Authorities have agreed that in their next generation of Local Plans to plan to a common end date of at least 2036. This is reflected in the evidence base for this framework insofar as it seeks to provide statistical information looking ahead to this period. This is also the date by when objectives are to be achieved. However, in parts, notably the vision, it is necessary for the document to take a longer term view.

Agreement 1 - That when preparing new Local Plans which seek to identify levels of Objectively Assessed Need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.

Section 2 – Vision and Objectives

2.1 Introduction

Norfolk is a diverse County. It covers a land area of 5,370 sq. km (2,074 sq. miles) and has a population of 892,900⁵. It is a largely rural county with a relatively low population density, although over half of the population lives in the built up areas of Norwich, Great Yarmouth and King's Lynn and a number of market towns⁶. These built up areas have a very considerable stock of historic assets and can offer a very attractive quality of life to residents.

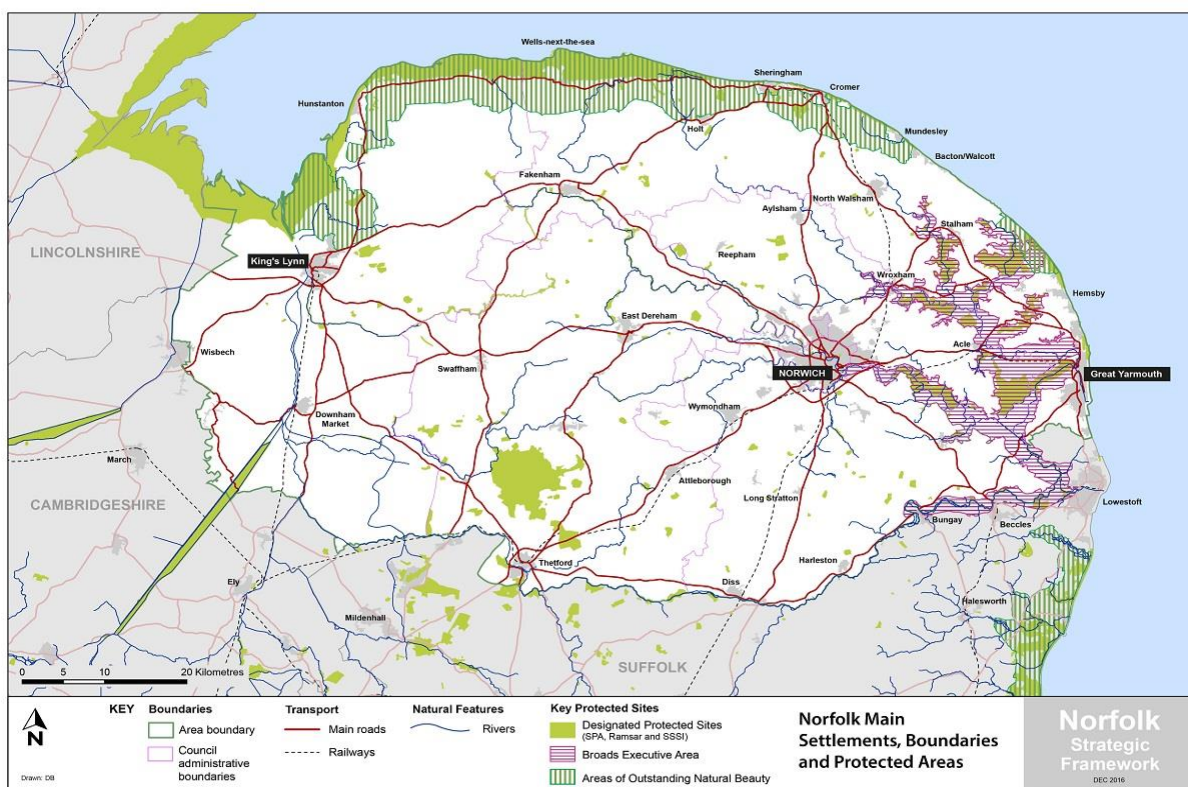


Figure 1: Map of Norfolk's main settlement, Authority boundaries, major transport connections and protected areas. 2017

Norfolk borders Suffolk to the south, Cambridgeshire to the southwest, and Lincolnshire to the west, and has a long coastal boundary stretching from The Wash to the south of Great Yarmouth. It contains many environments which are highly valued for their landscape and for their biodiversity and/or geodiversity interests. In particular, the Norfolk Coast Area of Outstanding Natural Beauty, the Brecks and the Broads, which is a unique network of protected rivers and lakes that extends partly into Suffolk and has the equivalent status to a National Park.

⁵ Mid year 2016 ONS estimate see Norfolk Insight web page <http://www.norfolkinsight.org.uk/population>

⁶ The 21 largest others centres are Attleborough, Aylsham, Cromer, Dereham, Diss, Downham Market, Fakenham, Harleston, Holt, Hunstanton, Loddon, Long Stratton, North Walsham, Sheringham, Stalham, Swaffham, Thetford, Wroxham/Hoveton, Wymondham, Watton, Wells-Next-The-Sea

Norfolk's economy is also diverse. It is home to a number of world class industries such as on the Norwich Research Park and the offshore energy sector in Great Yarmouth. Employment levels are growing; there is a highly skilled and versatile population with good graduate retention rates and improving links to the thriving markets of Cambridge, London and the wider South East. However, it is not without challenges, gross value added per job in the area remains below the UK average⁷, there are high levels of deprivation especially in urban areas and skill levels in the workforce are relatively low. The Economic Strategy (which was produced by the New Anglia Local Enterprise Partnership in 2017) identifies a number of interventions designed to significantly uplift economic performance in Norfolk. Additionally, the King's Lynn and West Norfolk Council area is also covered by the Greater Cambridge Greater Peterborough (GCGP) Local Economic Partnership. Details of the GCGP Strategic Economic Plan can be seen online⁸. The document is under review. The new Cambridgeshire Combined Authority is also reviewing economic prospects in their area.

Norfolk's infrastructure is comparatively under developed compared to many other parts of the wider South and East of England. For many years Norwich was the largest city in England not connected to the motorway network by a dual carriageway. Cross county trips tended to be slow and unreliable and rail journey times from London were comparable to places in the north of England such as York and Warrington. However, the dualling of the A11 improved travel time and connectivity considerably, and recent announcements on both the A47 and the Greater Anglia rail franchise have the potential to improve this further. Norwich Airport, the busiest airport in East Anglia, offers regular flights to various destinations in the UK and Europe. Many of the key road and rail links connecting Norfolk to the rest of the UK are still in need of improvement as are many of the links within the County. The need to enhance capacity of infrastructure networks can add considerable costs and increase delays to development.

Patchy mobile coverage is a continuing frustration to residents and businesses. However, the picture regarding superfast broadband coverage is rapidly improving; nearly 88% of the county's homes and businesses can now access superfast broadband, up from 42% in 2012⁹, and through the extension to the better broadband for Norfolk programme it is aimed to make high-speed broadband available to more than 95 per cent of Norfolk's premises by spring 2020.

Through working together and with government, businesses and residents Norfolk's Local Authorities hope to successfully address the challenges faced and maximise the potential of the County. As a basis for guiding this shared endeavour, the following shared vision and objectives have been agreed for consultation by the Strategic Planning Member Forum. For further information on the background to this material please see the papers previously considered by the Member Forum¹⁰.

⁷ See NEW Anglia Lep <http://www.newanglia.co.uk/wp-content/uploads/2014/03/New-Anglia-Strategic-Economic-Plan-V2.pdf>

⁸ see <http://www.gcgp.co.uk/local-growth-strategy/>

⁹ See Better Broadband for Norfolk Information Sheet 26 (26 May 2017)

¹⁰ See papers for the 13th October 2016 Member Forum at www.norfolk.gov.uk/nsf

2.2 Proposed Spatial Vision

Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.

“By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural, built and historic environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life for residents. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel.”

2.3 Proposed Shared Objectives

Agreement 3 - By 2036, through co-operation between Local Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership Economic Strategy, the Greater Cambridge Greater Peterborough Enterprise Partnership Economic Strategy and this framework;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements and across county boundaries to strengthen inward investment; and
- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure.
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.
- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

To reduce Norfolk's greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- effecting a major shift in travel away from car use towards public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes in line with the Economic Strategies of New Anglia & GCGP LEPS;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

To improve the quality of life for all the population of Norfolk by:

- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at local level.

To improve and conserve Norfolk's rich and biodiverse environment by:

- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;
- protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- minimising, where possible, development on the best and most versatile agricultural land;
- where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- protecting, maintaining and enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources; and
- Protecting and enhancing water, air, soil and other natural resource quality where possible.

Section 3 – Understanding the County

3.1 Administrative Boundaries

Within Norfolk there are seven separate District Council areas¹¹ (as shown in Fig.2), each of which is a Local Planning authority. Overlying parts of five of these areas (and also part of Waveney District in Suffolk) is the Broads Authority which is the Local Planning Authority for its area rather than the District Councils. The Broads Authority Executive Area (in which the Broads Authority are the planning authority) overlays these administrative areas and is illustrated in Figure 1.

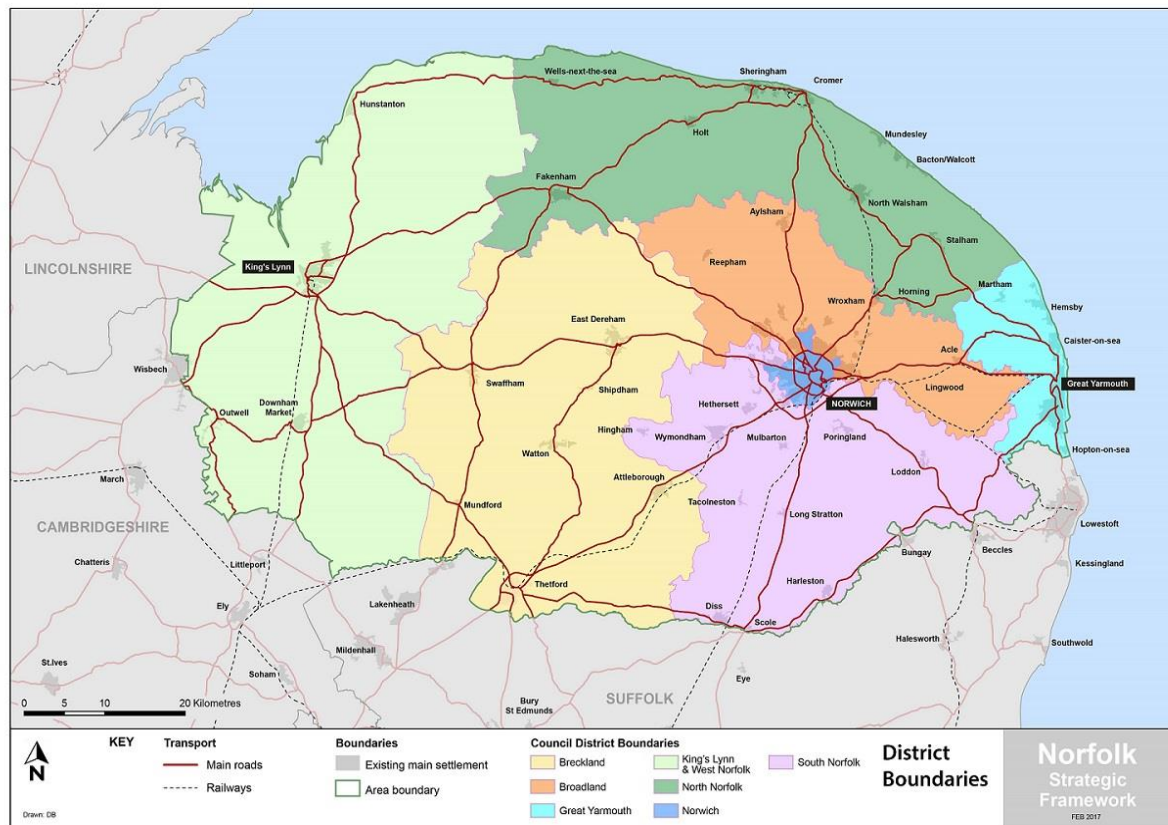


Figure 2: Map of Norfolk District boundaries and the major transport connections. 2017

In addition to the eight Local Planning Authorities the County Council are also a Local Planning Authority responsible for minerals and waste planning as well as certain operational development related to their functions (most notably for educational development). As County wide plans are already in place for minerals and waste¹² this framework does not address minerals and waste matters further although further iterations of these documents will doubtless need to reflect our

¹¹ Breckland District Council, Broadland District Council, Great Yarmouth Borough Council, King's Lynn and West Norfolk Borough Council, North Norfolk District Council, Norwich City Council and South Norfolk Council.

¹² <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/minerals-and-waste-planning-policies/adopted-policy-documents>

shared ambitions for growth. As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions.

Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development.

The economic geography of Norfolk is complex as it reflects a multicentric area and boundaries tend to be fuzzy. Overall the County has a relatively high level of self-containment as the vast majority of the resident workforce stay in Norfolk for work, although there are some strong functional cross county boundary linkages¹³.

Within the County the three larger urban areas of Norwich, King's Lynn and Great Yarmouth have a considerable influence providing jobs, retail, health care and a broad range of services and facilities as well as homes for a significant proportion of the county's population. These three centres are located in the east, west and centre of the County and have relatively limited functional connection with one another, notwithstanding the A47 linking all three.

3.2 Housing Markets

Housing Market Areas (HMAs) are defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. In defining them, regard is given particularly to: house prices and rates of change in house prices; household migration and search patterns; and contextual data (for example travel to work area boundaries, retail and school catchment areas). They tend to represent *"...the geographical area in which a substantial majority of the employed population both live and work and where those moving house without changing employment choose to stay"*¹⁴. All areas need to be identified as being within a housing market although housing market areas can overlap. Norfolk HMAs can be seen in Figure 3.

The Norfolk Districts and the Broads Authority have produced up to date Strategic Housing Market Assessments (SHMAs) which cover the entire County¹⁵. Within the Central Norfolk SHMA area

¹³ The linkages between Great Yarmouth and Lowestoft; the settlements in the Waveney Valley; and between King's Lynn and the Fens and Cambridge being particularly important.

¹⁴ Local Housing Systems Analysis: Best Practice Guide. Edinburgh: Scottish Homes

¹⁵ See https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf
https://www.west-norfolk.gov.uk/download/downloads/id/1736/shma_document.pdf

(comprising of Broadland District Council, Norwich City Council and South Norfolk Council) a case can also be made for the identification of a core area based around Norwich and its immediate environs including parts of both South Norfolk and Broadland District Councils. Outputs from the Central Norfolk SHMA include separate conclusions in relation to this core area.

The boundaries of Housing Market Areas will rarely correspond with the administrative boundaries of Local Authorities (Fig.3). In Norfolk there are three distinct HMAs centred on Norwich, King's Lynn, Yarmouth and their surrounding hinterlands. However there are some areas of the County which are distant from any of these centres; functional links are less apparent, and the case for inclusion within one HMA rather than another is less compelling. To ensure comprehensive coverage the Norfolk Authorities have agreed that the boundaries of the Housing Market Areas should be co-terminus and because housing targets will be set for each Planning Authority area the boundaries of HMAs should be 'snapped to' Authority boundaries.

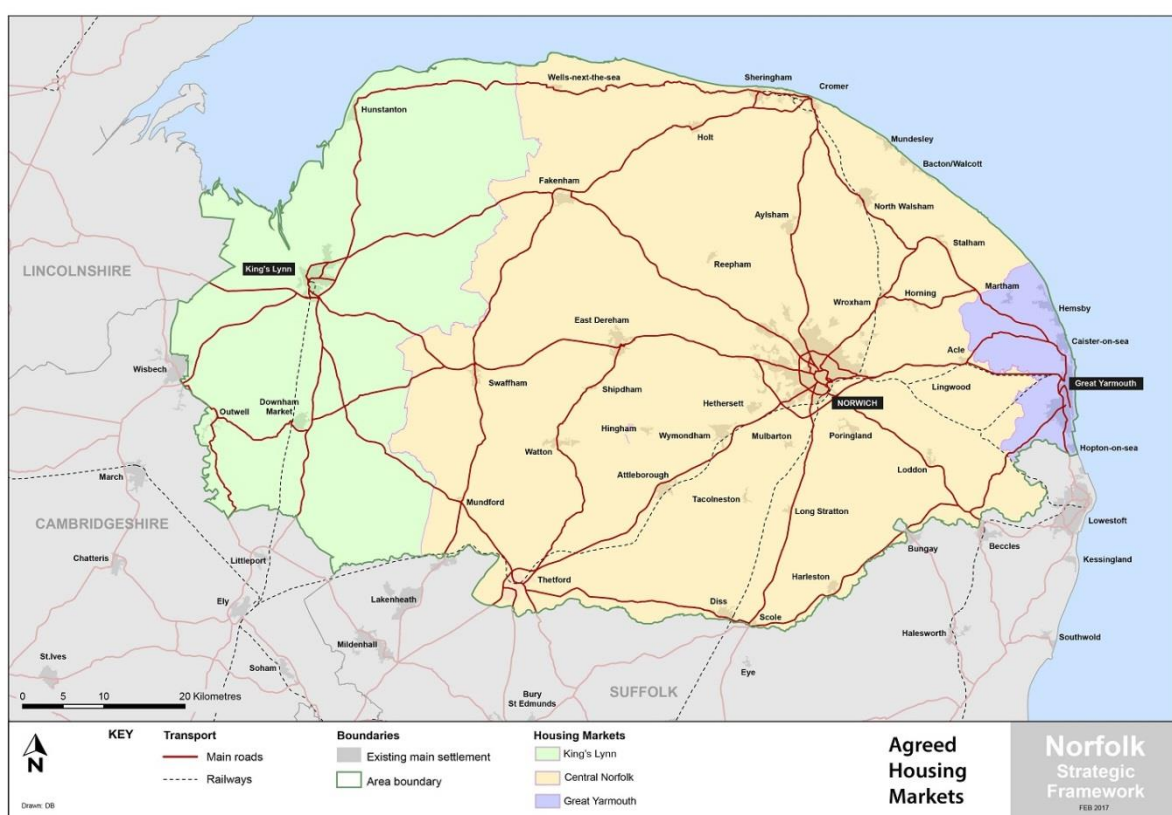


Figure 3: Map of Norfolk agreed housing markets and major transport connections. 2017

Agreement 4 –To produce and maintain Strategic Housing Market Assessments covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

<https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241>

The housing needs of the relevant parts of the Broads Authority Area are included within the SHMAs for Central Norfolk, Great Yarmouth and Waveney. The level of need within the Broads Authority area is specified within the Central Norfolk SHMA¹⁶.

By virtue of the methodological requirements of the definition HMAs, the Central Norfolk Housing Market is very large and includes settlements some considerable distance apart which have little or no functional connection. In response to this the Central Norfolk Strategic Housing Market Assessment¹⁷ defines a core housing market area identifying the settlements with the strongest connections to the Norwich Urban Area. This supports the decision to prepare separate Local Plans for North Norfolk and Breckland District Councils (see below).

The above agreement was drafted in advance of the publication of the “Planning for the right homes in the right places”. Clearly, with the possibility of a new standard methodology to assess objectively assessed housing need whether there will be a need to produce Strategic Housing Market Assessments in future is now open to question. However, it is clear that government still expects local planning authorities to plan for the right mix of home types and tenures to reflect local needs and the evidence base for such planning is only currently available from the SHMAs and is not available from the new proposed standard methodology. Therefore it has been concluded that until revised guidance from government is available on these matters it is best to retain agreement 4 within the NSF.

3.3 Strategic Functional Economic Market Areas

Government guidance recognises that since patterns of economic activity vary from place to place, there is no standard approach to defining a functional economic market area. However in recognising these areas it is possible to define them by taking account of factors including:

- extent of any Local Enterprise Partnership within the area;
- travel to work areas;
- housing market area;
- flow of goods, services and information within the local economy;
- service market for consumers;
- administrative area;
- catchment areas of facilities providing cultural and social well-being; and
- transport networks.

Boundaries of Travel to Work Areas (TTWAs) are illustrated below in Figure 4. Information on retail matters are captured within the existing evidence base supporting Local Plans¹⁸. Both these sources suggest that whilst Norwich is a major Regional Centre and draws trade from an extensive catchment across Norfolk and the wider region, both King’s Lynn and Great Yarmouth retain a

¹⁶ See pages 132-134 of the Central Norfolk SHMA
https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf

¹⁷ See pages 35-36 of the Central Norfolk SHMA
https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf

¹⁸ See in particular www.greaternorwichgrowth.org.uk/dmsdocument/816

sufficient degree of self-containment to be considered in different functional economic market areas for most purposes.

It should also be noted that there are some very strong and significant cross boundary functional economic relationships. Great Yarmouth has particularly strong links with Lowestoft to the South. Within the Waveney Valley there are strong relationships between settlements on both sides of the County boundary. In the West of the County, King's Lynn in particular has functional economic linkages to the Lincolnshire and Cambridgeshire Fens. Settlements such as King's Lynn, Downham Market and Thetford also benefit to some extent by good access to the Cambridge economy.

The position within the Central Norfolk area is again more complicated as for certain economic functions (such as higher order retail and cultural activities) the catchment area extends over the whole of Central Norfolk areas; there are far weaker connections in other areas of economic activity. In outer parts of the Central Norfolk area there is little functional connection for convenience shopping and the proportion of working residents who work in the Norwich urban area is very low¹⁹. Both Thetford and Mildenhall and Cromer and Sheringham are still regarded as being distinct Travel to Work Areas. These are illustrated below.

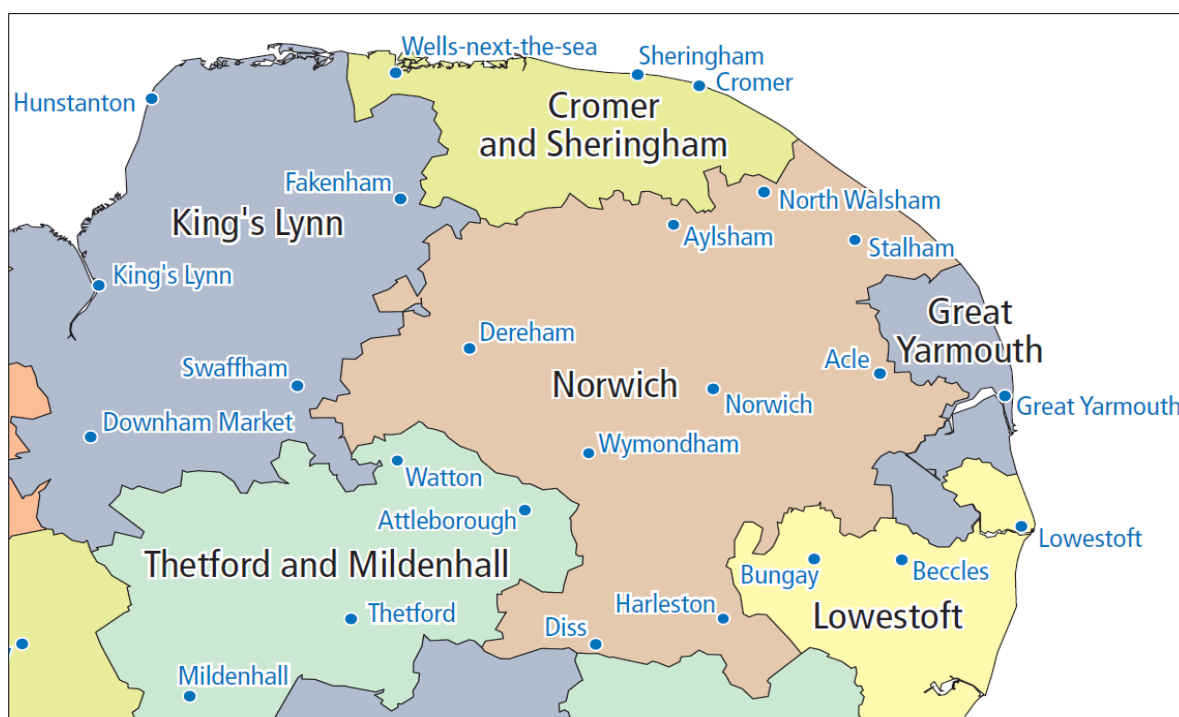


Figure 4: Norfolk's 2011 travel to work areas (TTWAs). Source: ONS 2015

The information available, including particularly the TTWAs and the higher retail analysis, suggests that the boundaries of strategic functional market areas are likely to be similar to the Housing Market Areas described above. Albeit, for many purposes significant sub-areas within these

¹⁹ The Central Norfolk SHMA identified the following settlements within the area of the 5 Central Norfolk Districts as having less than 10% of their resident workforce working in Norwich: Diss, Harleston, Sheringham, Swaffham, Thetford, Watton and Wells.

strategic areas will exist for a number of economic functions, especially within the Central Norfolk area.

3.4 Implications of Changing Infrastructure on Market Areas

Norfolk has benefitted from a number of significant improvements to its transport infrastructure. It is arguable that these, and others expected to be built over the next few years will have some effect on the functionality of the housing and economic markets. For example the dualling of the A11 (Fiveways to Thetford) was completed and opened in December 2014, significantly improving the road connectivity between much of the County, Cambridge, the wider South East and the Midlands. The A47/A143 link road, which opened in December 2015, now better connects Great Yarmouth's Enterprise Zone at Beacon Park to further growth areas. Work has also commenced on the Norwich Northern Distributor Road, which is expected to be completed before the end of 2018, and is a key part of the Norwich Area Transportation Strategy which also includes considerable investment in a range of other improvements across Norwich²⁰.

The Highways (England) Roads Investment Strategy contains a number of improvement schemes for the A47 as part of the government's trunk road programme from 2015 to 2020:

A47 Vauxhall and Gapton Roundabouts, Great Yarmouth

- A47 Blofield to Burlingham Dualling
- A47 Easton to Tuddenham Dualling
- A47/A11 Thickthorn junction

Additionally further improvement to the strategic road network of the County will be delivered by the Long Stratton bypass which is expected to be underway by 2020. The A17 is an important part of the road network, serving longer-distance trips, and is expected to be included as part of the Major Road Network, which we understand government will consult on before the end of the year.

In summer 2016 the Department for Transport confirmed Abelio as the operator of the new East Anglian rail franchise, which commenced in October 2016. The new nine year franchise will deliver a variety of improvements including the following that are of particular significance for Norfolk:

- Replacement of the entire fleet of trains which will all be in service by the end of 2020;
- More services and faster journeys across the network, including two 'Norwich in 90' trains each way per day;
- Norwich to Cambridge services extended to Stansted Airport every hour;
- Faster services between Cambridge and London;
- Work with Network Rail to implement specific schemes to drive up performance and reliability throughout the franchise;
- Increase in seats into London in the morning peak period, and an increase of more than 1,000 services per week on the franchise network; and
- Various other improvements including improvements to WiFi, stations and ticketing systems.

²⁰ See www.greaternorwichgrowth.org.uk/dmsdocument/554 for further information

A priority is the improvement of the Cambridge Norwich services including half hourly frequency.

Whilst the recently delivered and announced infrastructure enhancements are welcomed and cumulatively will assist the County in reaching its economic potential it is not considered likely they will result in any significant change to the functional geography of the County in the immediate future with regard to either housing or economic markets. East/West communications across the County will remain relatively slow and lack reliability, therefore it is likely that both King's Lynn and Great Yarmouth will retain similar levels of self-containment in housing and economic matters as present. The functional geography of the County will remain broadly as it is at least for the period of the preparation of the next round of Local Plans.

In the "Planning for the right homes in the right places"²¹ consultation document the government proposes "that every local planning authority produce a statement of common ground over the housing market area or other agreed geographical area where justified and appropriate".

In the light of the objectives of the government in introducing the requirement for statements of common ground, and the above analysis of our functional economic geography it is the view of the Norfolk Local Planning Authorities that there is a strong case to produce a single statement of common ground across Norfolk rather than seeking to produce three separate ones based on one large and two small Housing Market Areas. The reasons for this are:

- The recognised desire of the government not to disrupt existing joint working arrangements where these are effective;
- The high overall rate of self-containment of the Norfolk economy;
- The somewhat weak functional relationship between the outer areas of the Central Norfolk Housing Market Area and its core and the similarity of the strategic issues faced by these outer areas with the adjoining coastal and rural areas of Kings Lynn and West Norfolk and Great Yarmouth Boroughs; and
- The way in which the Broads Authority area overlaps both the Great Yarmouth and Central Norwich Housing Market Areas and five of the District planning authority areas which are signatories to this Framework.

Furthermore the shared understanding of economic geography has led to a number of agreements being reached about appropriate Local Planning areas for Norfolk.

The relative self-containment of both King's Lynn and Great Yarmouth suggests that in practical terms there may be problems in seeking to meet growth pressures evident in King's Lynn and Great Yarmouth within the central Norfolk area and vice versa. In the light of this the following agreement has been reached.

Agreement 5 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

²¹ <https://www.gov.uk/government/consultations/planning-for-the-right-homes-in-the-right-places-consultation-proposals>

With regard to Central Norfolk, the evidence does suggest that there may be some possibility for some of the growth pressures evident within the five Districts of Central Norfolk to be met within the different administrative areas of Central Norfolk. These five District authorities (Breckland, Broadland, North Norfolk, Norwich City and South Norfolk, along with the Broads Authority that partly overlaps 4 of their administrative areas) already co-operate closely, have a shared SHMA and are working on other joint studies. However, as noted above the Central Norfolk Housing Market Area is broad and contains places that have little relationship within one another and only a comparatively weak relationship with Norwich at the centre of the area. In the light of this the Local Authorities have reached agreement that whilst it will be necessary to closely co-operate on strategic planning matters and shared evidence it is only appropriate to seek to plan jointly over the area closer to Norwich with much stronger functional connectivity. The possible advantages of producing a single Local Plan covering all of Central Norfolk are considered to be outweighed by the delays this would cause to plan preparation and the difficulty of getting meaningful engagement over such a large area.

Agreement 6 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.

The issue of whether it is appropriate to define any sub market areas or not will be a matter for those Plans. This approach does not preclude the possible redistribution of growth across the Central Norfolk area should this be supported by evidence and agreed by the relevant planning authorities.

Furthermore, the Broads Authority Area overlaps functional housing and travel to work areas of Central Norfolk, Great Yarmouth and Lowestoft. The area clearly has a unique environment and a very distinct set of planning challenges which suggest that joint Local Planning would not be the best approach.

Agreement 7 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

For further information on the current Local Plans in the County and the timetable for review please see the Norfolk Compendium²².

²² See <https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use/norfolk-compendium-of-local-plans-2016.pdf>

Section 4 – Projections of growth

As a baseline for planning activity published projections for the County must be considered, including projections regarding population, households and employment. These are summarised below. However, it should be recognised that these are statistical projections and tend to be very heavily based on the extrapolation of past trends. In forward planning it is essential that other factors are given due weight. This is done in subsequent sections of this document and these projections are only produced for information.

4.1 Population Projections

The most recent set of national population projections were published by the Office for National Statistics (ONS) in May of 2016²³. Table 1 shows a steady growth in population levels projected at a 14% increase over the 22 year period from 2014-2036. All districts are projected to see a broadly similar level of growth of between 9% and 15% overall apart from South Norfolk that is projected to grow much more rapidly.

Table 1: Current and projected population numbers for Norfolk Districts. Source: ONS, 2016

District	2014 (000's)	2036 (000's)	Population growth 2014- 2036 (%)
Breckland	134	154	15
Broadland	126	140	11
Great Yarmouth	98	107	9
King's Lynn and West Norfolk	150	167	11
North Norfolk	103	116	13
Norwich	138	159	15
South Norfolk	129	160	24
Norfolk	878	1,002	14

It should be noted that these projections do not take into account existing planned growth such as existing commitments in the Greater Norwich Joint Core Strategy. This would suggest a somewhat different distribution of population growth between the Greater Norwich authorities.

The population projections also contain considerable information of the age profile of the population. This is potentially of considerable strategic significance for Norfolk which will have considerable implications for Local Authority services and will need to be considered in Local Plans. The projected age profiles are set out in the Table 2 and 3 below.

²³Available at

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2>

Table 2: Existing population numbers (000s) and % by age quantiles (2014) and projected population numbers and % by age quantiles (2036) of Norfolk Districts. *Source: ONS*

District	All people (000s)	2014			All people (000s)	2036		
		000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)		000s Aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	134	29.4 (21.9)	72.9 (54.4)	31.7 (23.7)	153.7	31.2 (20.3)	73.5 (47.8)	49 (31.9)
Broadland	126	26.1 (20.7)	68.8 (54.6)	31.2 (24.8)	140.1	27.2 (19.4)	67.8 (48.4)	45.2 (32.3)
Great Yarmouth	98.2	22.2 (22.6)	53.4 (54.4)	22.5 (22.9)	107	22.3 (20.8)	52.7 (49.3)	31.9 (29.8)
King's Lynn and West Norfolk	150	31.8 (21.2)	81 (54)	37.1 (24.7)	166.9	34 (20.4)	79.9 (47.9)	53.2 (31.9)
North Norfolk	102.9	18.6 (18.1)	52.1 (50.6)	32.1 (31.2)	115.8	19.5 (16.8)	50.8 (43.9)	45.6 (39.4)
Norwich	137.5	30.2 (22)	86.9 (63.2)	20.4 (14.8)	158.9	35.1 (22.1)	95.9 (60.4)	27.8 (17.5)
South Norfolk	129.2	29 (22.4)	69.7 (53.9)	30.4 (23.5)	159.6	35.4 (22.2)	77.2 (48.4)	46.8 (29.3)
Norfolk	877.7	187.4 (21.4)	484.9 (55.2)	205.2 (23.4)	1002	204.7 (20.4)	497.8 (49.7)	299.4 (29.9)

Table 3: Change in 000s between 2014 and 2036. Difference between 'All People' for each district between 2014 and 2036 in %. *Source: ONS*

District	All people (000s)	Difference between 2014 and 2036		
		000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	19.7	1.8 (-1.64)	0.6 (-6.6)	17.3 (8.2)
Broadland	14.1	1.1 (-1.3)	-1 (-6.2)	14 (7.5)
Great Yarmouth	8.8	0.1 (-1.8)	-0.7 (-5.1)	9.4 (6.9)
King's Lynn and West Norfolk	16.9	2.2 (-0.8)	-1.1 (-6.1)	16.1 (7.2)
North Norfolk	12.9	0.9 (-1.2)	-1.3 (-6.8)	13.5 (8.2)
Norwich	21.4	4.9 (0.1)	9 (-2.8)	7.4 (2.7)
South Norfolk	30.4	6.4 (-0.3)	7.5 (-5.6)	16.4 (5.8)
Norfolk	124.3	17.3 (-0.9)	12.9 (-5.6)	94.2 (6.5)

These tables show that whilst the overall population of the County is projected to grow steadily at a relatively modest rate, the change in the age profile is more significant with over three quarters of

the total increase between 2014 and 2036 being accounted for by growth in the over 65s²⁴. The number at the older end of the age spectrum projected to increase particularly strongly; the number of over 80s is projected to almost double. Between the ages of 20 and 64 population growth is projected to be very slow, with only a 2.7% growth rate over the 22 year period, whilst the numbers of 0-19 years olds are projected to grow by 9.2%.

These numbers do vary somewhat between individual districts (with Norwich being notably less affected by an ageing population) but the growth in the elderly population is projected to affect most parts of the County and will create significant issues given current models for funding social care and education provision. These issues are not considered further in the framework but the issues relating to housing are considered further in the housing section below.

The recent 2017 Health profile for England²⁵ suggests:

- Life expectancy continues to rise, albeit at a declining rate, but the number of years spent in poor health is increasing. This will impact the need for particular housing, transport and service delivery solutions
- The life expectancy gap between men and women is closing which may later affect the size of older person households over time
- Deprivation and inequality continue to be key and enduring factors in poor health outcomes and so need addressing. Consequently access to housing and employment and the impact of spatial and economic planning on these factors needs consideration
- There is growing evidence of the link between incidents of flooding and poor mental health

²⁴ Total growth in population age 65 plus is 95,000

²⁵ See <https://www.gov.uk/government/statistics/2017-health-profiles>

4.2 Household Projections

The most recent set of household projections were published by Department for Communities and Local Government (DCLG) in July 2016²⁶. These show that due to demographic changes households will increase at a marginally faster rate than population. Similar patterns of growth are shown as for population but again it should be noted that these projections do not take into account growth planned in existing Local Plans which may influence the scale and distribution of the growth in households.

Table 4: Past and present household numbers with future household projections. Source: ONS

District	1991 (000's)	2001 (000's)	2014 (000's)	2036 (000's)	Household growth 2014-2036 (%)
Breckland	44	51	56	68	21
Broadland	43	50	54	63	17
Great Yarmouth	36	39	43	50	16
King's Lynn and West Norfolk	53	58	64	74	16
North Norfolk	38	44	47	56	19
Norwich	54	55	62	74	19
South Norfolk	42	47	55	70	27
Norfolk	310	344	383	453	18

It should also be noted that much of the household growth projected between 2014 and 2036 can be accommodated by housing for which provision has already been made through planning permissions and/or allocations made in existing Local Plans.

4.3 Employment Projections

Across the East of England Local Authorities use the East of England Forecasting Model (EEFM) to better understand the development needs of their area. The model provides a set of baseline forecasts designed to facilitate the setting of consistent housing and jobs targets and can also provide a means of generating alternative scenarios. It is prepared by the independent forecasting house Cambridge Economics and further information about the model and details of runs published are available online²⁷.

Table 5 sets out the headline results for Norfolk Districts produced in the 2016 run of the model. As with any forecast model, these results need to be treated with a degree of caution. They are “policy neutral” and assume that policy context in the future remains broadly as it has in the past. They cannot reflect the impact of any recent or future interventions that may be made through infrastructure investment, Economic Strategies or Local Plans. In addition, the reliability of a number of the underlying datasets decreases at smaller scales, and economic activity is not limited by council boundaries, so individual sector and District forecasts should be treated as being broadly indicative.

²⁶ See <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

²⁷ See <http://cambridgeshireinsight.org.uk/EEFM>

Overall the model shows that without additional intervention total job levels in the Norfolk economy are projected to grow at relatively modest rates over the next 20 years with most of the growth projected taking place within Greater Norwich. If the aims of the City Deal are added to the model's forecasts, it projects that over 75% of all the net growth in Norfolk will take place in Greater Norwich.

Table 5: Current total employment with projected jobs levels and growth. Source: EEFM 2016 and Central Norfolk SHMA

Districts	Current total employment (000's)			Projected jobs levels 2036 (000's)	2014-2036 growth (000's)
	2012	2014	2016		
Breckland	52.4	56.1	55.3	56.7	0.6
Broadland	53.8	52.8	55.7	57.8	5.0
Great Yarmouth	43.7	44.0	45.1	49.7	5.7
King's Lynn and West Norfolk	65.4	67.4	68.4	72.8	5.4
North Norfolk	39.2	41.2	41.8	43.7	2.5
Norwich	93.0	92.9	99.4	110.9	18
South Norfolk	58.5	59.5	60.3	70.8	11.3
Greater Norwich*	205.3	205.2	215.4	251.3**	46.1
Norfolk	406.0	413.8	426.0	474.3**	60.5

*Broadland, Norwich & South Norfolk

**City Deal additional 11,800 jobs added but not broken down between GN Districts

Section 5 – The Economy

Strategic Economic Objectives

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership Economic Strategy, the Greater Cambridge Greater Peterborough Enterprise Partnership Economic Strategy and this framework;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements and across county boundaries to strengthen inward investment; and
- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure.
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.
- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

5.1 Introduction

Compared to other areas in the UK, Norfolk has generally weathered the economic downturn since 2008 well. This is largely due to its diverse economy which is not reliant on any one sector. County employment levels and Gross Value Add (GVA) have returned to pre-downturn levels. The value of Norfolk's economy is £18.6 billion.²⁸

Overall Norfolk's economy is growing, although growth is stronger in some parts of the County than others. This growth is driven by certain sectors of the economy, mostly concentrated in specific geographic areas, where there are particular strengths and expertise, for example energy, advanced engineering, tech/digital, food and life sciences. Norfolk's overall employment rates have consistently remained above national levels over the past 10 years (currently by 2.8%) and unemployment rates are currently 2.1% below the national rate at 3.1% - the lowest rates in a ten year period. However, this disguises substantial variation, and the County includes some of the most

²⁸ New Anglia LEP, 2015

deprived communities in the Country which have not weathered the downturn so well. The potential impact of Brexit adds uncertainty to future projections.

There are significant geographic clusters of existing business activity that anchor the Norfolk economy, with a number of these offering significant potential for growth. These key sector/industrial clusters can be summarised as follows:

- Agriculture and Food Processing – Breckland, King’s Lynn & West Norfolk, North Norfolk, Greater Norwich
- Tech/digital Industries – Greater Norwich
- Offshore Energy – Great Yarmouth
- Engineering & manufacturing – King’s Lynn & West Norfolk, Breckland, Greater Norwich, Great Yarmouth
- Financial Services - Greater Norwich
- Health and Life Sciences – Greater Norwich
- Tourism – The Broads, The Brecks, Great Yarmouth, North Norfolk, King’s Lynn & West Norfolk, Greater Norwich

Notwithstanding these clusters and our economic strengths, the challenge going forward is the Norfolk economy’s high level of dependency on lower wage, lower-skill sectors such as food production, agriculture and tourism, and the related high concentrations of very deprived populations in some parts of the County and ‘hidden’ rural poverty elsewhere. This is reflected in productivity levels per head which are significantly below the national average. This, coupled with low levels of investment, relatively poor infrastructure and skills attainment, impacts on potential future economic growth.

While this Strategic Framework addresses development matters (broadly speaking, building and changes in the use of land), it is recognised that to be fully effective this needs to be complementary to other programmes and measures at the district, county, regional and national levels. In the light of the factors mentioned above, endeavours to promote ‘inclusive growth’ are especially relevant such as developing skills, community aspiration and capacity; recognising and nurturing the contributions of voluntary and community sectors; the quality of job opportunities, etc.

Many districts have their own economic development strategies, and there is a good record of collaboration on specific economic development projects. This Framework provides the opportunity to lay the foundation for developing strategy and such cooperation going forward.

The UK government published a green paper Building our Industrial Strategy in January 2017²⁹. The overarching aim and ambition of the Industrial Strategy is to provide a long term framework to build on our areas of competitive advantage, to close the gap between our best and worst performing areas, and make the UK one of the most competitive places in the world to start or grow a business. The strategy identified 10 key separate but linked pillars of the strategy and recognised the importance of place in shaping and delivering the Industrial Strategy.

²⁹ See <https://www.gov.uk/government/consultations/building-our-industrial-strategy>

The overarching strategy for Norfolk set in the context of the New Anglia LEP area is set out in the Economic Strategy which was published in 2017³⁰ (Please note the King's Lynn and West Norfolk area is also covered by the by the Greater Cambridge Greater Peterborough Local Economic Partnership Strategic Economic Plan³¹). This set a number of ambitious targets regarding jobs numbers, new business start-ups, housing delivery, and productivity by 2036. Some of the key targets are summarised in Table 6:

Table 6: Summary of Key Economic Strategy targets (New Anglia Area)

Economic Strategy Headline	Target (to 2036)
Jobs	88,000 more jobs
Businesses	30,000 new businesses
Housing	140,000 new houses
GVA	£39 per Hour

It is expected that measures to assist in the delivery of these objectives will be brought forward as part of the Implementation of Delivery and Investment Plans in Spring 2018.

The Norfolk Local Authorities are committed to strengthened collaboration and focus on new initiatives and interventions to help nurture economic growth in higher value, knowledge based sectors across Norfolk. These include new multi-site Enterprise Zones led by the New Anglia LEP, the new Cambridge-Norwich Tech Corridor, innovation centres at King's Lynn and Hethel, and energy related Enterprise Zones across Great Yarmouth and Waveney.

Supporting the growth of Norwich Research Park for example, and other key Enterprise Zone sites, will help to grow knowledge jobs in key sectors and enhance the commercialisation of research. A greater focus on supporting digital entrepreneurs will also help strengthen the growing cluster of tech/digital creative enterprises in and around Norwich's city centre, and strengthening supply chains in the manufacturing, engineering and energy sectors will enhance business sustainability and employment growth.

The DCLG household forecast reproduced above in section 4.2, Table 2&3 suggests that there will be an annual growth in households of approx. 3,200 households per annum across Norfolk through to 2036. Yet the housing needs assessment set out in table 9 in section 6.3 below commits the Local Authorities to making provision for a least 4,000 new homes per annum over the same period (excluding additional housing for the City Deal). Although a minor element of this difference may be accounted for because of housing backlogs caused by historic under-delivery, the largest factor is the expectation of economic development that has been built into the needs assessments. The methodologies used to calculate housing needs effectively make some allowance for job and productivity growth in future being in excess of current levels. Therefore it is recognised that additional economic interventions will be needed in order to deliver the objectives identified within this framework.

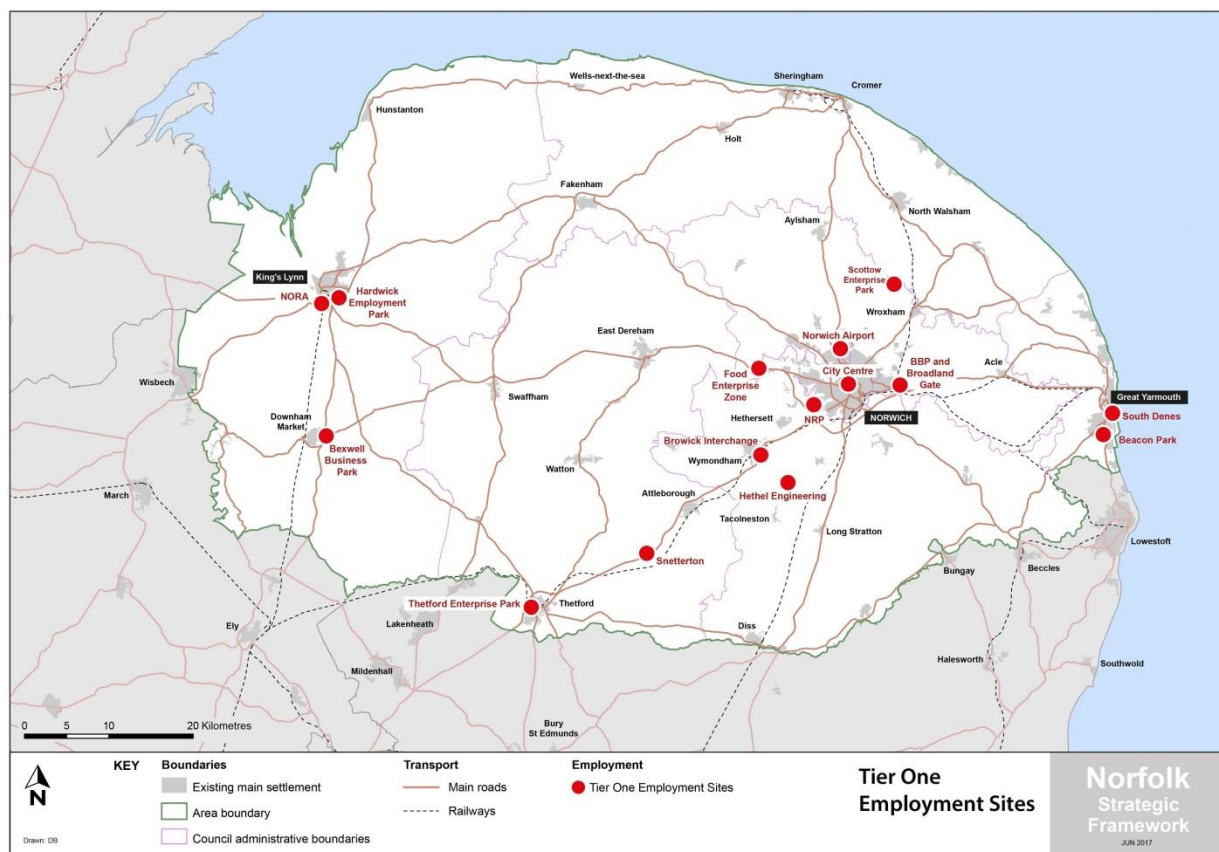
³⁰ See <https://newanglia.co.uk/our-economic-strategy/>

³¹ see <http://www.gcgp.co.uk/local-growth-strategy/>

The development of this framework has concentrated on; identifying strategic sites, possible further interventions and cross boundary working that will need to be taken forward to deliver the shared objectives that have been agreed.

5.2 Strategic Employment Sites

Strategic employment sites have been agreed through joint activity on economic development and inward investment. They are all located in the growth locations identified in New Anglia LEP's Strategic Economic Plan and are targeted at the SEP's key sectors. Therefore it is crucial to facilitate a step change in our economy and the focus of promotional activity.



Together they form a package of sites that provides a comprehensive offer for inward investment and strategic growth, a number of which have Enterprise Zone status. The number and availability of these sites gives Norfolk an economic advantage in attracting certain types of inward investment. In addition, as a result of their scale and type, these sites have additional potential through existing and planned close cross-boundary working. By their nature some of these sites form part of wider functional economic areas which span district/county boundaries, increasing potential for joint collaboration to enhance economic growth.

Agreement 8 recognises that these Tier 1 sites should be protected from loss to alternative uses such as housing which is consistent with Paragraph 4.18 of the Housing White Paper which proposes that employment sites identified as “strategic” will not be subject to reduced protection from residential development. It is therefore proposed that the Tier 1 employment sites identified in Table 7 are formally recognised as “strategic” employment sites within Agreement 8.

Table 7: Tier one employment sites, sector, location and size. 2017

Site	Supports SEP Key Sector(s)	SEP Growth Location	Land available (approx.)
Bexwell (Downham Market)	ICT and Digital Creative	King's Lynn and Downham Market (A10)	29 ha
Broadland Business Park area			
- plots on existing BBP			
- BBP Laurel Farm	Financial services	Greater Norwich	55ha
- St Andrews northside,	ICT & Digital Creative		
- Broadland Gate			
Browick Interchange (Wymondham)	Advanced Manufacturing & Engineering. ICT and Digital	Tech Corridor	22 ha
Food Enterprise Zone Honingham/Easton	Food, Drink & Agriculture	Greater Norwich / Tech-corridor	19ha
Great Yarmouth Enterprise Zone and Energy Park sites:			
- Beacon Park (EZ)	Energy	Great Yarmouth and Lowestoft	13.5ha
- South Denes (EZ & EP)			25ha
Hardwick extension (King's Lynn)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10)	27 ha
Hethel Engineering Centre and Technology Park	Advanced Manufacturing & Engineering	Greater Norwich Tech Corridor	20ha
Nar Ouse Business Park (King's Lynn) (part EZ)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10 corridor)	17 ha (EZ)
Norwich City Centre	ICT and Digital Creative Financial Services Tourism and Culture	Greater Norwich	Multiple Sites
Norwich Airport			
- Aeropark			
- Southern area (around Hurricane Way)	Advanced Manufacturing & Engineering	Greater Norwich	75ha+
- Airport business park			
Norwich Research Park (part Enterprise Zone) NRP North and South	Life Sciences Food, Drink & Agriculture	Greater Norwich Tech Corridor	45ha (EZ 25ha)
Scottow Enterprise Park	Logistics Energy	Greater Norwich/ North Norfolk	26 ha
Snetterton	Advanced Manufacturing & Engineering	Tech corridor	68ha
Thetford Enterprise Park	Advanced Manufacturing & Engineering Food, Drink & Agriculture	Tech corridor	18ha

Agreement 8 - The above list of locations are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses.

This list will need to be kept under review in the light of emerging Economic Strategy priorities and the progress on Local Plans.

5.3 Key Cross-Boundary Economic Issues and Interventions

This section identifies the principal strategic economic matters and other matters which can only be fully addressed through development plans in (or across) more than one local planning authority area. It therefore does not include a wide range of matters which whilst they are recognised as very important, but which do not meet the specific definition of strategic development 'Duty to Cooperate' matters laid down by the Localism Act. These include the generality of

- rural economy (including agriculture);
- tourism and recreation;
- development of market towns;

Development associated and supporting these is addressed through individual local plans and informal joint working between local planning authorities, and these issues are addressed more widely through economic and other strategies. Neither is this section intended to include every economic issue that requires cross-boundary working, but just those of an extensive or special significance from a Norfolk wide perspective.

The role of Norwich

Norwich and its immediate hinterland is the prime economic generator in the County. Its influence, and the policy measures required to make the most of this extend well beyond both the City Council's boundaries and the existing urban area.

A large part of the county depends upon the vibrancy of the city for employment, services, higher order retail, culture and leisure. It also has an economic importance as a public transport hub. The vibrancy and focus of activity in the city centre also attracts significant numbers of visitors, and helps make the wider area an appealing place to live, work, invest and locate businesses.

The economy of this wide area of influence will benefit from ensuring that the city is accessible; the centre continues to thrive and is attractive to inward investment; and out of centre development complements the overall offer.

The Norwich Northern Distributor Road (NDR) will support the delivery of planned housing and jobs to the north and north-east of Norwich. It will improve strategic access to a wide area of Broadland and North Norfolk. Realising the full range of economic opportunities will benefit from cooperation. The Airport supports the economy of the area including the off shore energy sector.

Broadland, Norwich, and South Norfolk, with Norfolk and the Broads Authority, are working through the Greater Norwich Development Partnership (GNDP) on the planning of the area.

The Norwich Area Transportation Strategy (NATS) identifies the transport improvements needed over the next 15+ years. The NATS Implementation Plan (agreed 2010, updated 2013) sets out a range of transport measures with their intended phasing for delivery over the short to medium term. Both are due to be updated.

Cambridge to Norwich Technology Corridor

The corridor from Norwich to Cambridge, identified in Fig.6, includes a cluster of existing tech businesses and strategic employment sites. It provides the potential for significant economic development, particularly as connectivity has improved with full dualling of the A11 between Norwich and Cambridge. The corridor also benefits from the Norwich to Cambridge railway line. These opportunities need to be supported and exploited to maximise economic benefits.

The corridor is identified as a key growth corridor in the New Anglia LEP's Strategic Economic Plan and the Greater Cambridge Greater Peterborough LEP are also part of the Cambridge Norwich Tech Corridor Initiative partnership. The Cambridge Norwich Tech Corridor initiative³² has been established to maximise the economic benefits of this high quality location for technology based businesses with its world class universities, research institutes and long established tech businesses. The partnership will capitalise on the talent pool, emerging sectors, low cost space, high quality environment, infrastructure networks and a fast growing economy to deliver innovation-led growth and investment.

In Norfolk the corridor extends through Norwich, South Norfolk and Breckland, and then into Suffolk and Cambridgeshire.

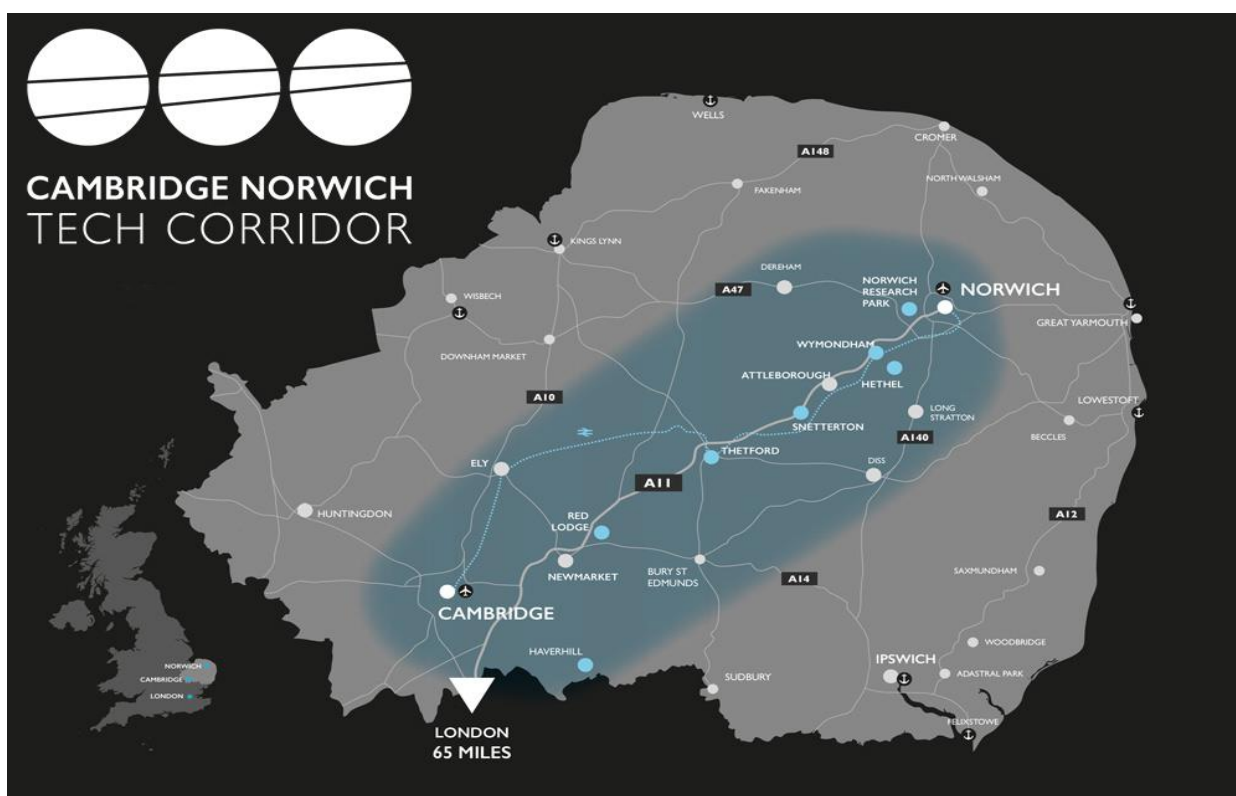


Figure 6: The Tech Corridor between Cambridge and Norwich, 2017

³² See <http://www.techcorridor.co.uk/> for further information

A47 Corridor

The A47 crosses the county and, directly or indirectly, affects all Norfolk's districts, parts of Suffolk and Cambridgeshire. The current limitations of the A47 act as a brake on economic growth, hindering investment, adding business and commuter costs, cause disproportionate accident and safety issues and contribute to the 'peripheral' image of Norfolk. Improvements to the road will unlock jobs, increase GVA and attract additional private investment all along its length.

The A47 Alliance comprises of representatives from all Local Authorities, the business community, MPs and stakeholders along the whole of the trunk road route between Peterborough and Lowestoft. The Alliance is working to make the case for improvements and to secure the necessary investment to implement these. Partners will need to consider how best to cooperate to realise the economic potential of improvements.

At Wisbech the emerging Garden Town proposal may result in up to 12,000 additional homes (on top of the 3,550 homes already allocated in the Fenland Local Plan) effectively doubling the size of the town. This is linked to a potential new rail connection which would put the town within commuting distance of Cambridge and Peterborough. The existing allocation relating to East Wisbech is incorporated into the emerging plan.

Offshore Energy Sector / Ports of Great Yarmouth & Lowestoft

The ports of Great Yarmouth and Lowestoft are successfully developing their role in the huge growth in offshore wind generation and major planned gas field decommissioning in the southern North Sea, building on 50 years' experience in offshore energy.

These two ports, in close proximity, together form a strategically significant economic (and infrastructure) resource, generating employment and supply chains of regional significance. The sector is also supported by businesses and facilities, such as Norwich Airport, in Greater Norwich. The critical mass of facilities, infrastructure and businesses helps the area compete with areas elsewhere, including on the other side of the North Sea.

There is a long and continuing history of collaboration between Great Yarmouth, Waveney, Norfolk and Suffolk Councils to make the most of these opportunities.

Through close cooperation, these bodies and the LEP were successful in bidding for an Enterprise Zone (EZ) covering six sites in Great Yarmouth and Waveney to strengthen and build the offshore energy sector in the area. This EZ is one of the most successful in the country, the only zone to have exceeded the original EZ targets. The two Norfolk sites in Great Yarmouth are South Denes and Beacon Park.

Great Yarmouth Borough Council, Norfolk County Council, Highways England and the New Anglia LEP have cooperated closely on developing the road transport infrastructure to support the growth of the offshore energy sector in Great Yarmouth, with particular focus on bidding for a third river crossing, to provide direct access to the Port from the trunk road network, rather than through the heart of the town as at present, and improving the A47 link to the rest of the country.

Norfolk Coast, the Broads and the Brecks

The Norfolk Coast, the Broads and the Brecks are the 3 key cross boundary areas of the county where economic benefits include not only their attraction for tourism and recreation, but also their contribution to quality of life, and hence the attractiveness of Norfolk as an area to live, work and to locate a business. The economies of these areas are dependent on businesses, infrastructure and

environmental protection in surrounding areas. This is particularly the case for the Broads Executive Area, where the Broads Authority boundary is very tightly drawn.

In order to maximise the economic benefits a number of issues require coordination across planning authority boundaries, including coastal change, erosion and flooding; environment, landscape and habitats; as well as tourism and recreation itself. By working together the relevant authorities can ensure complementary measures, and maximise potential economic benefits.

All the Norfolk coastal districts, together with the Broads Authority (part of which is on the coast), Waveney District Council in Suffolk, and the Environment Agency have worked together on one or more of the three Shoreline Management Plans covering the Norfolk Coast, developing understanding of the technical and political challenges involved, and coordination of efforts to address these.

The quality, importance and diversity of the natural environment, including the Coast, the Broads and the Brecks, is reflected in the numerous national and international designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, and Sites of Special Scientific Interest (SSSIs), and protected landscapes (Norfolk Coast Area of Outstanding Natural Beauty and the Broads). The planning authorities have a role in helping to protect and manage these assets, along with Natural England, the Environment Agency and a wide range of non-statutory environmental and community organisations. Ensuring that new development can proceed sustainably without harm to protected sites or species, or to biodiversity or geodiversity in the wider environment, is a particular challenge. Through joint working and cooperation across planning authority boundaries, a better understanding of the potential impacts from development (especially relating to housing and recreation) is being developed, and new ideas and best practice for monitoring and mitigating any impacts are being shared

A10 corridor

The A10, and parallel rail line from King's Lynn to Cambridge (passenger and freight), provides a strategic transport corridor. The section from King's Lynn to Downham Market is identified as a growth location in the New Anglia SEP. To realise the growth potential of the A10 Corridor there is a need to improve journey times, reliability of services and enhancement of operational capacity. Cambridgeshire County Council have commissioned studies of the economic potential and transport options for the route north of Cambridge. A feasibility study is underway to strengthen the case for the Ely area improvements (road and rail) to enable more frequent rail services to operate in future; while longer peak hour trains should be able to run from King's Lynn by the end of 2018. A new Cambridge North railway station recently opened enabling improved access to jobs in the businesses on the north side of Cambridge for Norfolk residents once longer trains are up and running. There is potential for large-scale job growth in the corridor at Downham Market; while the largest housing allocation in the west at West Winch/North Runcton requires the completion of the West Winch Relief Road and Hardwick junction improvements to be fully developed.

Agreement 9 - The emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

5.4 Strategic Principles of Economic Success

It is clear that Local Authorities will need to continue to work collaboratively with one another, LEPs and businesses in order to deliver the step change in economic performance that is necessary to deliver the shared objectives. Among the measures that are thought likely to be necessary at this stage are:

Supporting future economic growth

- supporting the development of businesses in identified priority sectors, including building on and making links with established and emerging clusters, and the provision of land and premises;
- facilitating physical regeneration and enhancement projects in areas of deprivation, involving the local community in the process;
- encouraging international trade and supporting increased inward investment

Education and skills

- supporting the creation, expansion and enhancement of education establishments, including further education, technical institutes and universities to increase the level of skills in the workforce; and
- enhancing the quality of the natural and built environment to ensure that the area remains attractive for its quality of life, and as a location for business.

Connectivity

- supporting employment allocations that minimise travel distance and maximise the use of sustainable transport modes;
- ensuring that investment in strategic transport infrastructure demonstrably supports economic growth, and also ensuring that economic strategies and Local Plans support the case for investment in that infrastructure; and
- enhancing the provision of infrastructure to enable digital connectivity that will facilitate economic growth.

Section 6 – Housing

Strategic Housing Objectives

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

6.1 Introduction

The overall objective of national policy is to ensure that sufficient homes of the right type, are built in the right locations, and at the right time to address all existing and newly arising needs for homes. This means meeting both the market *demand* for new housing and addressing the *need* for homes including the needs of those who are currently unable to afford to buy or rent a suitable home locally. Homes built should be of the right type having regard to needs of the existing and future population and should address the specific needs of groups such as the elderly, those with disabilities, students and the gypsy and traveller community. Local Plans should include measures to address the need for appropriate specific types of dwellings. These could include for self-build, starter homes and other tenures of affordable housing.

In February 2017 the Government published the Housing White Paper “Fixing our Broken Housing Market”³³. This document sets out a broad range of reforms that Government plans to introduce to help reform the housing market and increase the supply of new homes. Alongside the White Paper a number of supporting technical documents which provided the evidence underpinning many of the white paper proposals were also published and the government has recently launched a Housing Infrastructure Fund³⁴ targeted at unblocking delayed developments. It is clear that increasing the delivery of new homes is likely to remain a major priority for the UK government for the foreseeable future and the issue of delivery is considered further below.

³³ Available at <https://www.gov.uk/government/collections/housing-white-paper>

³⁴ Available at <https://www.gov.uk/government/publications/housing-infrastructure-fund>

By 2036 the population of the County is expected to grow from an estimated population in 2016 of 889,800 to 1,00,2000³⁵, a rise of 113,200 or 12.7%. Much of this growth is driven by net inward migration and an increase in the aging population.

Based on this population projection the evidence³⁶ suggests that the Norfolk Authorities will need to collectively plan for approximately an additional 84,000 (approx. 4000 per annum) homes between 2015 and 2036. Many of these new homes are already included within adopted Local Plan documents. In most parts of the County housing delivery rates have fallen behind existing plan targets and although building rates have improved in recent years the Authorities are currently aiming to deliver around 4,900 homes per year to address earlier shortfalls.

Since the draft NSF was published for consultation the government published a proposed standard approach to assessing local housing need. Overall this proposed methodology suggested that the annual housing need of Norfolk was similar to the needs that had been identified by the local authorities through the production of the Strategic Housing Market Assessments. The draft NSF had identified annual housing need as 3,966 homes whereas the standard methodology suggested a figure of 4,106 (3.5%) higher. Additionally the local authorities had, previously in draft agreement 16, suggested that they would agree to “The quantity of homes planned will be increased by a buffer equal to not less than 10% of their OAN requirement, such buffers to be treated as additional supply rather than as part of their housing target” and in agreement 13 the authorities producing the Greater Norwich Local Plan had suggested they would accommodate a further uplift from the City Deal. It is as yet unclear as to whether either uplift would be considered necessary on top of the need calculated by its proposed standard methodology.

Notwithstanding the overall similarity at the County level between the figures contained within the draft NSF and those within the government’s proposed methodology, the picture varied more considerably at the level of individual district, with each District figure being at least 15% different from that which had been locally calculated. This difference is illustrated in the table over the page.

³⁵ Mid 2014 based ONS population projections

³⁶ Central Norfolk, King’s Lynn and Great Yarmouth Strategic Housing Market Assessments

Table 8: Objectively Assessed Need (OAN)

Area	Annualised housing need Table 8 of draft NSF	Annualised housing need in proposed govt methodology	Difference
Breckland	584 ³⁷	680	+96 (16.4%)
Broadland	389	528	+139 (35.7%)
Great Yarmouth	420	338	-82 (-19.5%)
KLWN	670	525	-145 (-21.6%)
North Norfolk	405	511	+106 (26.2%)
Norwich	724	602	-122 (-16.9%)
South Norfolk	763	922	+159 (20.8%)
Broads Authority (Norfolk part)	11	n/a ³⁸	n/a
Norfolk	3,966	4,106	+140 (3.5%)

This potential different distribution of housing needs across the County potentially raises a number of cross boundary issues that will need careful consideration moving forward and it is clear that the agreements previously suggested will not necessarily be able to be maintained if the proposed standard approach is imposed on the local authorities. This matter will need further consideration in the early part of 2018 when the government announces its response to the consultation it has conducted and produces the draft revised NPPF.

It would appear that impacts of the considerable fluctuations at District level will be moderated by the fact that Broadland, Norwich and South Norfolk are intending to produce the Greater Norwich Local Plan allowing for redistribution of needs across the plan area. Furthermore, as Breckland District Council submitted its emerging Local Plan in November 2017 it will be covered by the transitional arrangements proposed in the consultation paper meaning that the assessment of OAN will be based on the Central Norfolk SHMA rather than the proposed standard methodology.

However, there will be a need to consider whether the scale of uplift in housing rates suggested for North Norfolk District is capable of being delivered without compromising either the principles of sustainable development or the special qualities of the District. This work will need to be done collectively in early 2018 as it could lead to potential redistribution of housing to elsewhere in the County.

³⁷ Note as the Breckland Local Plan is covering a period of 2011-36 its annualised OAN is considered to be 612pa rather than 584pa as this reflects under delivery in the period 2011-15

³⁸ The Government Consultation said 'where local planning authorities do not align with local authority boundaries, such as National Parks, the Broads Authority and Urban Development Corporations, available data does not allow local housing needs to be calculated using the standard method set out above'. In these cases we propose that authorities should continue to identify a housing need figure locally, but in doing so have regard to the best available information on anticipated changes in households.

For the time being the agreements previously proposed for housing are proposed to be retained but it should be noted that these only apply insofar as the current evidence base of the SHMAs relate to and will need to be reviewed if the standard methodology is imposed.

6.2 Existing targets, supply, and delivery rates up to 2021

The NPPF requires that when Local Plans are prepared they plan for the required quantity of homes and that this quantity is deliverable over the period covered by each plan. In addition each authority should ensure that for each rolling five year period there are sufficient deliverable sites available to meet identified housing targets, address any historical shortfalls and provide for a buffer of either 5% or 20% of additional deliverable supply as a mechanism to extend choice and help ensure targets are met.

The number of dwellings built in the County since 2007 have generally fallen behind published Local Plan targets due to the impact of the recession. As a consequence, the required annual rate of housebuilding required to meet targets has been increasing by arithmetic as the targets seek for any shortfall in housing provision to be met in full over the plan period or the next five years (depending on the precise methodology). Additional uplifts in targets over the next five-year period are also necessary where there has been persistent under-delivery, to provide more choice and competition in the market. This can result in some areas having very high levels of deliverable housing sites that need to be identified in order to meet housing needs in the next five years.

It is likely that this trend of increasing annual rates of housebuilding requirements will not continue in the future, for two reasons: firstly, the rate at which housing is being delivered is increasing; and secondly, local planning authorities need to keep their assessments of housing need and local plans up to date. In reviewing housing need, the appropriate level of backlog that needs to be addressed is reconsidered and in parts of the County it appears that current levels of backlog arise in part from historic projections of levels of net in-migration in the period 2008-16 being considerably higher than the actual net in-migration levels that were observed during this period. Therefore, as new Local Plans are adopted, there may be tendency for rates of housebuilding required in the short term (i.e. the next five years) to reduce from their current levels due to reassessment of the backlog element within them.

It should also be noted that land supply issues may ease because since the recession and particularly the publication of the National Planning Policy Framework in 2012, the number of unbuilt planning permissions has also been increasing, so that by the start of 2016 there was a large stockpile of consented sites. Across the county as a whole, the Authorities assess that some 30,000 new dwellings could be built in the five years between 2016 and 2021 from currently available sites.

In practice, delivery rates of housing development will vary considerably from one year to the next, with significant periods of under-delivery in some years and over-delivery in others, depending on a wide range of factors including site availability, economic conditions, and the capacity of the local building industry. For this reason annualised targets represent a blunt instrument against which to assess delivery. Individual authorities will continue to consider carefully how new housing needs evidence might be taken into account appropriately in plan-making and the determination of planning applications.

Detailed information on the availability and deliverability of new housing is published annually by each authority in their Five Year Land Supply Statements.

6.3 Future Housing Demand and Need 2015-2036.

The National Planning Policy Framework requires that the Objectively Assessed Need (OAN) for homes within defined Housing Market Areas (HMAs) is addressed by planning authorities when preparing Local Plans, unless the consequences of doing so would result in unsustainable development. Working with others, Local Authorities should determine their OAN over an identified period and plan to ensure that this is addressed.

The evidence³⁹ concludes that Norfolk is covered by all, or parts of, three separate Housing Market Areas and this has led to agreement about producing evidence and appropriate planning areas.

Strategic Housing Market Assessments have been prepared for each of these Housing Market Areas which identify the objectively assessed needs for new homes within each HMA. This evidence has also been used to derive OAN figures for each planning authority area. New evidence, including revised national population and household forecasts, will be published at regular intervals and Authorities will use the latest available information from a range of sources in relation to both demand, and their ability to plan a sustainable supply, when determining final housing targets for inclusion in Local Plans.

To ensure better alignment of Local Plans all Norfolk Authorities have agreed to prepare new Local Plans which address the level of housing need for the period until at least 2036 and most have formally commenced the process of plan review. The latest Strategic Housing Market Assessments conclude that approximately 84,000 new homes (4,000 pa) will be required in the County between 2015 and 2036. As outlined earlier, a significant proportion of this is already included within the adopted Plans of the authorities, has planning permission or is under construction. New Local Plans being prepared by the Planning Authorities will need to address the remainder and clearly show how the OAN for each Housing Market Area is being addressed.

The current process of establishing OAN and translating this into housing targets is a complex one and the required approach and the underpinning evidence is subject to periodic change. Further changes have been signalled in the Housing White Paper and the recent consultation on Planning for the Right Homes in the Right Places. Furthermore whilst Housing Market Areas are by definition relatively self-contained there are clearly wider relationships with parts of Suffolk, Cambridgeshire, Lincolnshire and the wider south east which should be taken into account when determining housing targets for inclusion in Local Plans. It is not the role of this Framework to set the housing targets for individual Local Plans but to ensure that sufficient homes are built. All Norfolk Authorities have agreed to prepare Local Plans, either individual or joint plans, which will aim to deliver *at least* enough homes to address all OAN until at least 2036.

³⁹ **Central Norfolk Strategic Housing Market Assessment 2017** - covering Norwich, Broadland, and South Norfolk authorities, together with substantial parts of North Norfolk, Breckland and the Broads Authority, together with a more marginal interaction with other parts of Norfolk and Suffolk.

King's Lynn and West Norfolk Strategic Housing Market Assessment – Covering the administrative area of King's Lynn and West Norfolk Borough Council.

Great Yarmouth Strategic Housing Market Assessment - Covering the administrative area of Great Yarmouth Borough Council.

Agreement 10 - When determining their respective Local Plan housing targets each authority, working together where desirable, will aim to deliver at least Objectively Assessed Need as identified in the most up to date evidence (Table 8). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.

Table 9: Objectively Assessed Need (OAN) in Norfolk Housing Market Areas.
Source: CN SHMA 2017, KLWN OAN Update 2016, GY SHMA 2013, AMR 2016

Housing Market Area	Planning Authority Area	Total OAN identified in Assessment for the 21 years between 2015-2036	Annualised OAN
Central Norfolk SHMA**	Norwich City	15,201	724
	South Norfolk	16,032	763
	Broadland	8,160	389
	Breckland***	12,272	584
	North Norfolk	8,511	405
Central Norfolk Sub Total (excluding BA area)		60,176	2,865
King's Lynn and West Norfolk OAN Update 2016*	King's Lynn and West Norfolk	14,070	670
Great Yarmouth SHMA 2013*	Great Yarmouth Borough Council	8,820	420
Part Central Norfolk part Great Yarmouth HMA	Broads Authority (within Norfolk)	229	11
Norfolk Total		83,295	3,966

* Totals for Great Yarmouth and King's Lynn and West Norfolk assume annualised rates identified in published SHMAs are rolled forward to 2036. All SHMAs will be subject to periodic update and these updates and other evidence will be used to establish Local Plan housing targets.

** Based on CN SHMA June 2017 which reflects the 2014 household projections, excluding any additional provision needed to reflect the City Deal

*** Note as the Breckland Local Plan is covering a period of 2011-36 it's annualised OAN is considered to be 612pa rather than 584pa as this reflects under delivery in the period 2011-15

The Broads

The total OAN in the Broads Authority Executive Area between 2015 and 2036 is 286 dwellings (approx. 14 per year). In the Central Norfolk SHMA these figures are broken down between the overlapping Districts as follows: Table 9: Projected dwelling need within the Broads Authority area 2015-2036

	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	Waveney
Total OAN	50	70	3	40	66	57

In view of the special qualities of the Broads there has been a long standing agreement between the BA and their overlapping local councils about the other areas planning to meet any housing needs arising in the BA area⁴⁰. Following various legal cases it has been considered necessary to change this historic approach and for the OAN to be calculated for the BA area. However, it would clearly not be in the best interests of good planning in Norfolk for planning in the Broads area to be driven by a need to meet statistically derived housing targets where this would be incompatible with the protection of the special qualities of the Broads.

Agreements 11 and 12 below addresses this matter although it should be noted that emerging evidence suggests, with the possible exception of the part of the BA area in Great Yarmouth Council area, that the BA will be able to find sufficient sites for housing to meet identified needs within its own area in locations considered to be compatible with the protection of the Broads.

Agreement 11 – The Broads Authority will meet its calculated portion of the wider housing need within each of the relevant SHMAs, as far as is compatible with the protection of the Broads landscape and special qualities.

Agreement 12 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Waveney District Council in Suffolk (and hence not signatories to this framework) have also agreed to do the same.

Implications of the City Deal for Housing

In December 2013 the Greater Norwich City Deal was signed⁴¹. The City Deal was expected to see 300 new businesses supported and secure an additional £100 million of private investment. The deal was also expected to create more than 19,000 jobs, including 3,000 high value jobs at Norwich Research Park, 2,000 jobs around Norwich Airport, 1,000 jobs based around Norwich University of the Arts and 6,000 construction jobs.

⁴⁰ See http://www.broads-authority.gov.uk/_data/assets/pdf_file/0008/432998/Duty-to-Cooperate-Planning-For-Housing-and-Employment-in-and-Around-the-Broads-Proposed-Memorandum-of-Understanding-040113.pdf

⁴¹ See <https://www.gov.uk/government/publications/city-deal-greater-norwich>

The housing implications of the City Deal were assessed thoroughly as part of the Central Norfolk SHMA. This calculated that the total adjustment needed to ensure sufficient homes are provided to meet the needs of the additional workers resulting from the City Deal was 9,505 over the period 2015-2036 across the five Central Norfolk Districts. However, as the OAN for the Central Norfolk Authorities already includes a response to market signals uplift, additional provision is only needed in the three Greater Norwich districts where the implications of the City Deal exceed the response to market signals already built into the figures.

Agreement 13 – In addition to their OAN, Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of 5,228 homes⁴² within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

6.4 Type of Homes

It is critically important to ensure that sufficient homes are provided but it is equally important that the homes that are built are the right type in terms of size, affordability and tenure. In this regard key issues affecting the County are providing suitable homes for:

- Those on lower household incomes who are unable to afford market prices and rents
- A rapidly aging population
- A growing student population in and around Norwich
- Gypsy and Traveller communities

Collectively, the Authorities are committed to the delivery of energy efficient homes which minimise the inefficient use of scarce resources and each Local Plan will consider the desirability of requiring enhanced construction standards which go beyond the requirements of the current National Building Regulations.

Unless there is a significant increase in earnings or a slowing rate of house price increases the evidence concludes that dwelling affordability will continue to be a major issue in most parts of the County. Delivery of affordable homes, as with other types of housing has failed to keep pace with existing and newly arising needs. Forecasts indicate that across the County as a whole some 26% of the total future housing requirement will need to be provided as affordable homes but this masks significant local variations.

The significance of this issue for Norfolk should not be underestimated. There would be particularly severe impacts on a number of key economic sectors if housing affordability worsens and there is not considerable increases in the availability of forms of housing that meet the needs of people who are employed in low wage sectors across the county. Essentially the situation will vary from one council area to another so is best addressed through local plans rather than through collective agreement.

⁴² Paras 5.6-13 and table 96 of the Central Norfolk SHMA 2017 explain this in some detail. Overall if the additional jobs envisaged under the City Deal are delivered the requirement for housing in Greater Norwich will increase by 8,361 over the period 2015-36, however, 3,133 of this is already captured in the Objectively assessed need figure due to the response to market signals, therefore the additional requirement if City Deal job growth levels are achieved is 5,228 homes.

Inward migration from the rest of the UK, mainly due to retirement to the area, is forecast to be the major driver of population growth in the County over the next 20 years and a rapidly aging population, particularly outside of the three main urban centres will continue to increase the need for homes. By 2036 over 15% (163,000 people) of Norfolk's population is forecast to be over 75 years of age and if current trends continue this will increase the need for specialist forms of accommodation such as care, nursing and assisted living schemes. These specialist accommodation needs are not included within household projections and authorities should carefully consider the latest available evidence⁴³ and develop strategies to ensure these needs are met. If current trends continue an increasing proportion of elderly people will remain in their homes for longer periods.

Specialist types of accommodation

Strategic Housing Market Assessments are prepared to establish the likely total need for new dwellings over a given period. These assessments quantify the needs of those residing in households including gypsy and travellers and those living in caravans and houseboats but they do not account for those living in other types of communal accommodation such as care and nursing homes and student halls of residence. Therefore in addition to the target for new dwellings Local Plans will need to separately quantify and provide for other specialist types of accommodation and fully understand the relationship between the need for new dwellings and the need for different types of non-household accommodation.

Elderly People

The identified OAN of approx. 84,000 dwellings across Norfolk includes the conventional housing needs of elderly people, but does not include people residing in care and nursing homes. On this basis, all self-contained elderly person housing is counted within the housing supply; but the supply of bed spaces in residential institutions (Use Class C2) is not. If sufficient Class C2 bed spaces are not provided in the period 2015-36 then these people will not vacate existing dwellings and therefore more dwellings may be required. Evidence indicates that the current supply of beds in Care homes for Norfolk is estimated to be 9,921; this is around 660 beds less than the current identified need for 10,581 spaces. If current trends and policies continue and the proportion of people living in care homes remains static the estimated need in Norfolk by 2036 will be 17,949 beds, this is 8,028 more beds than the current supply and is equivalent to an increase of 382 beds per year. The study⁴⁴ also provides information on the distribution of existing and needed bed spaces throughout Norfolk.

Student Housing and the OAN

Planning Policy Guidance was updated in March 2015 to include specific reference to identifying the needs of students. It requires that Local Planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campuses.

The largest higher education provider in Central Norfolk is the University of East Anglia (UEA). The University has a campus in Norwich and a total of over 14,500 students, with around 90% of UK

⁴³ Norfolk Accommodation Needs of the Elderly Study 2016.

⁴⁴ Norfolk Accommodation Needs of the Elderly Study 2016

national students being full time (academic year 2016-17) and the remainder being part time. The University currently maintains 4,300 bed spaces on campus. Norwich also contains the Norwich University of the Arts which has 1,900 full-time students, City College with 11,000 full and part-time students and Easton College with 300 students.

The Central Norfolk Strategic Housing Market Assessment concludes that based on historical trend the student population in and around Norwich is likely to grow by around 420 students per year. The SHMA assumes that this student population will live in dwellings and this need is added to the OAN requirement for new homes. If accommodation is provided in the form of student halls of residence or other specialist student accommodation provided by the private sector the OAN dwelling requirement can be reduced accordingly at a suggested ratio of one dwelling reduction for each three bed spaces provided.

Accommodation needs of Gypsies, Travellers, and other types of accommodation

The accommodation needs of Gypsies and Travellers, including Travelling Showpeople, and those residing in boats and mobile/park homes are included within the overall assessments of housing need and comprise part of that need rather than an additional requirement. These types of accommodation which are provided can therefore count towards addressing locally set housing targets. Locally authorities have prepared specific evidence to quantify the levels of need for such accommodation and use this evidence to inform Local Plan preparation. Five Norfolk authorities (Broadland, Gt Yarmouth, North Norfolk, Norwich and South Norfolk), plus the Broads Authority, commissioned a Caravans and Houseboats Needs Assessment to 2036, which was completed in October 2017⁴⁵. Breckland DC commissioned its own study⁴⁶ and the Borough Council of King's Lynn and West Norfolk is a partner in a Cambridgeshire-based needs assessment⁴⁷.

Agreement 14- The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

Other forms of specialist accommodation such as self-build and accommodation for military personnel will be addressed by individual authorities but the Norfolk Strategic Planning Member Forum will keep this position under review.

Considerable comment was made on this document during the consultation stage that more should be done to control the impact that second homes and holiday homes are having on the availability and affordability of residential accommodation generally and particularly in coastal areas of the County. Whilst there may be significant concerns on these matters in parts of the County, and there are a range of actions that local councils are taking to promote the provisions of affordable and open

⁴⁵ See <https://www.south-norfolk.gov.uk/sites/default/files/Norfolk-Caravans-and-Houseboats-Needs-Assessment.pdf>

⁴⁶ See https://www.breckland.gov.uk/media/2662/Breckland-Gypsy-and-Traveller-Accommodation-Assessment/pdf/2016_11_29_Breckland_GTAA_Final_Report.pdf

⁴⁷ See https://www.scambs.gov.uk/sites/default/files/2016_11_14_cambridgeshire_gtaa_final_report.pdf

market housing which meets the needs of local people, in practice there is nothing that can be done under the current legislative framework to control the occupancy of the existing housing stock in the way that appears to be favoured by a number of respondents of the draft NSF.

6.5 Capacity and Distribution

Some parts of the County are more constrained than others and their capacity to accommodate new growth is similarly variable.

Each Authority has, or is, preparing Housing and Economic Land Availability Assessments (HELAAAs)⁴⁸ using a standardised methodology which has been agreed by all Authorities. These are assessments of unconstrained capacity and take no account of the policy choices that each authority may make when preparing their Local Plan. Although this work has still to be completed it is anticipated that Norwich City, Broadland and South Norfolk will work jointly to address their shared housing need through the Greater Norwich Local Plan with other District Authorities having the capacity to address its own housing need.

Agreement 15 – All Local Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

6.6 Delivering Housing Growth

Over the past decade the quantity of new homes delivered in the County has not kept pace with published targets notwithstanding that the number of planning permissions granted typically exceeds the required quantity of development. This is likely to have been compounded by economic recession and poorer housing market conditions in some areas which may have reduced developer confidence.

Slower than required delivery rates have resulted in inadequate or marginal five year land supply positions resulting in the need to release unplanned development sites in some parts of the County. Recognising this, and reflecting the provisions of the recently published Housing White Paper the Norfolk Authorities have agreed to take a range of actions to improve future housing delivery. The situation will be reviewed in Spring 2018 in light of the new government methodology once this is published and the impact this will have on OAN for each district can be ascertained.

Agreement 16 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:

- **Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.**
- **Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.**

⁴⁸ Housing and Economic Land Availability Assessments

However, such is the scale of delivery challenge facing the County there may well be the need for further actions to be taken to ensure housing targets can be met. Norfolk authorities have jointly commissioned a study to look further into the issues impacting delivery within the county. The report highlighted 10 measures to be considered which will be further addressed by Local Authorities in bringing forward their Local Plans:

- Allocating a balanced range of sites and scales of development
- Enable early stage engagement with high profile councillors and leader of the Council to facilitate stakeholder buy-in and community liaison at the site allocation stage.
- Support and encourage allocation and development of retirement developments, bungalows, lifetime homes and extra care facilities for independent elderly living in suitable environments
- Use Planning Performance Agreements where appropriate for larger scale and more complex housing sites
- Employ or nominate strategic development officers to focus on larger scale growth allocations and assist developers through the planning process. These staff may be a shared resource between neighbouring authorities.
- Seek to invoke Service Level Agreements for Utilities and Network Rail related infrastructure where large scale sites are reliant on strategic interventions.
- Review the s106 approach for larger scale sites and consider a hybrid approach with early phases considered in more detail than later phases to enable flexibility for sites which have longer timeframes.
- Facilitate the creation of a county-wide developer forum
- Consider whether statutory powers can be used to assist with unlocking difficult sites
- Work up a funding strategy with the local highway and flood authorities to support sites where major infrastructure is required and this is not covered by CIL.

Alongside these possibilities there may also be other measures taken which would complement these actions:

- Greater support with infrastructure planning in relation to large scale plans for urban expansion to increase confidence and reduce risks for the industry and make them more attractive for housebuilders to build out at quicker rates than in the past. Increasing the number of housebuilders active in the Norfolk market and increased use of modular (off-site) building techniques will also assist here;
- Action to stimulate the SME's in the construction sector to increase the number of firms capable of building on the scale of sites that typically result in 5-50 dwellings being provided; and
- Action to stimulate the self and custom build sector considerably.
- Further joint working to improve the speed, customer focus, predictability and efficiency of the planning system; and
- A considerable drive to increase the number of people entering the construction sector across the board, particularly in the light of the probable impact of Sizewell C construction on the market of skilled construction labour in Norfolk.

The Norfolk Strategic Planning Member Forum is likely to give consideration to whether there is any benefit in doing further joint work on delivery issues in 2018.

Section 7 – Infrastructure and Environment

Strategic Infrastructure and Environmental Objectives

To realise the economic potential of Norfolk and its people by:

- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure; and
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements to strengthen inward investment.
- strengthening Norfolk's place competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.
- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

To reduce Norfolk's greenhouse gas emissions as well as the impact on, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- effecting a major shift in travel away from car use towards public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

To improve the quality of life for all the population of Norfolk by:

- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at local level.

To improve and conserve Norfolk's rich and biodiverse environment by:

- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;;
- protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- minimising, where possible, development on the best and most versatile agricultural land; where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- protecting, maintaining and, enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources; and
- Protecting and enhancing water, air, soil and other natural resource quality where possible.

7.1 Introduction

Infrastructure and Environmental objectives have been considered together in the context of the Norfolk Strategic Planning Framework. The issues addressed are complex and multi-faceted and much of the work that has been completed on this subject by working closely with appropriate expert groups.

As is reflected in the introductory text in this framework and is recognised in the agreed vision and objectives the future economic and social prospects for the County cannot be divorced from issues of environmental protection and infrastructure provision. The quality of Norfolk's environment, both in terms of the countryside, it's historic City and the wide range of distinctive towns and villages it includes, give access to a quality of life which is one of the key selling points of the County and the retention and enhancement of which will be crucial to attracting the growth in highly productive economic sectors that is sought. Yet, as is also noted, Norfolk's infrastructure is comparatively under developed compared to many other parts of the wider South and East of England and will need significant enhancement if growth is to be delivered at the scale envisaged without compromising the quality of life and environment on offer.

It would appear that there is a growing recognition of the comparative under development of Norfolk's Infrastructure and a number of announcements have been made about funding of investment in key infrastructure enhancements, especially in relation to transport. These are detailed later in the document and it will be important to ensure timely implementation of these projects.

The Infrastructure Delivery Plan⁴⁹ (IDP) has been produced by the County Council working with all the local planning authorities and utility providers. It identifies strategic infrastructure requirements and provides an update on the delivery of a range of projects. The projects in the IDP reflect the key

⁴⁹See <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies>

infrastructure needed to deliver the scale of growth ambitions outlined in the NSF. The IDP is a working document that will be regularly updated as information becomes available. The IDP will help co-ordination, implementation, prioritise activity and respond to any funding opportunities. It will also enable Local Authorities to prioritise the release of revenue funding for the development of scheme information to assist the prospects of successful bids being made for capital funding to deliver further projects. As it concentrates on strategic infrastructure it does not identify the full range of infrastructure required for development.

7.2 Utilities

To deliver the rate of growth that is planned across Norfolk in the coming years considerable further investment will be needed in utilities infrastructure. A list of the main schemes that are thought to be necessary is outlined below.

Table 10: Priority Utilities Projects for Promotion⁵⁰

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Easton, Hethersett and Cringleford sewerage upgrade	Delivery 2011-2026	TBC	Private sector
Northeast Norwich Trunk Sewer	Delivery 2011-2026	TBC	Private sector
North and Northeast Norwich substations	Not Known	TBC	Community Infrastructure Levy and private sector
Snetterton energy supply	2017/18	£3.1m	Local Enterprise Partnership. Private sector, Local Authority Funding now agreed
Thetford energy supply	Not Known	£6.5m	Growth Deal and private sector
Thetford water supply	Not Known	£9.78m	TBC
Thetford Sewage Scheme	Not Known	£2m	TBC
Earlham Substation	Not Known	TBC	Community Infrastructure Levy and private sector
Heigham Water Works	Not Known	£30m	Private sector
Wymondham water supply connections	Not Known	£22m	Private sector
King's Lynn Sewerage improvements	Not Known	£1-1.2m	Community Infrastructure Levy and private sector
Increased surface water capacity North Lynn	Not Known	TBC	IDB/private sector

⁵⁰ The preparation of Anglian Water's Long Term Recycling Plan is currently at an early stage and is due to be formally published, following consultation, in summer 2018. It relates to the investment that will be made by Anglian Water as part of our business plans which are prepared once every 5 years to ensure that there is sufficient sewage treatment capacity to accommodate growth within our region. Water and wastewater infrastructure is funded and delivered through a combination of investment made by Anglian Water through their business planning process and developer contributions for water supply and foul sewerage network improvements which are sought under the provisions of the Water Industry Act 1991. As such there are existing mechanisms to ensure that any improvements are made to the water supply and foul sewerage networks to serve new development.

7.3 Electricity

Provision of energy, particularly electricity is fundamental to housing and economic growth as energy consumers require access to reliable energy supplies. Since 2004, the UK have been a net importer of energy, and this has changed the way we view our energy security (Annual Energy Statement 2014). Housing and employment growth will put a greater strain on the electricity network with many of the primary substations in Norfolk already reaching capacity.

The 33kV main transmission network in Norfolk is the main network for new on-shore electricity providers and major users such as employment sites and large scale residential development. It is essentially three networks with one in the west serving King's Lynn and West Norfolk and extending in a limited way into the western side of North Norfolk and Breckland; one centred in Norwich and extending to Attleborough and the central and eastern parts of North Norfolk; and one serving the towns along the southern border and extending round to Great Yarmouth. This leaves significant, largely rural, parts of the county some distance from potential connections to this network. This particularly applies to a central swathe running north south, and a southern swathe running east west.

The electricity network is subject to a number of operational constraints which challenge the ability to predict the future capacity of substations over the time periods that are typical for Local Plans. UK Power Networks (UKPN) will not normally invest to provide additional unassigned capacity and the costs of capacity upgrades falling on developers can be significant. The ability of developers to reserve supply, and unexpected windfall development adds further uncertainty to the forward planning process. In addition, the power requirements of end users of employment sites can vary significantly and are unknown at the time the land is allocated in a Local Plan.

In developing Local Plans it is clear that Local Authorities will need to work closely with UKPN to ensure that identified locations where housing and employment growth will require strategic enhancement of the electricity supply networks to support new developments can be delivered without delaying the delivery of development or rendering it unviable. Partners continue to work with UKPN to overcome current constraints and prevent future issues, and to explore mechanisms to ensure the cost of electricity infrastructure is shared proportionately between planned developments.

Additionally all Local Plans across Norfolk will need to promote new developments which minimises energy use; minimise reliance on non-renewable or high-carbon energy sources and promote and encourage the use of decentralised and renewable or low-carbon energy sources and sustainable construction technologies ensure that investment decisions help promote growth and overcome constraints and there are forward looking decision on energy investment.

7.4 Water

Norfolk lies within one of the driest parts of the UK. Planned growth in housing and employment will significantly increase water demand. The area's large agricultural sector is also dependent on water availability in the summer. Water quality is crucial, due to the number of protected sites relying on high water quality, including the Broads

Anglian Water supplies water to the majority of Norfolk county with parts of Great Yarmouth and the Broads Authority being served by Essex and Suffolk Water. Water companies have a statutory obligation to prepare and review Water Resource Management Plans (WRMP) once every 5 years setting how they will maintain a sustainable balance between water supplies and demand.

Anglian Water's Water Resources Management Plans to 2040 demonstrates how sufficient water for future growth will be provided and therefore water supply is not a strategic constraint to development through appropriate supply and demand measures. Consideration is given to reducing the potential demand for water before proposing supply measures.

Local Plans can also contribute to long term water resilience by ensuring that new development incorporates water efficiency measures including the adoption of the optional higher water efficiency standard (110 litres/per person/per day).

Agreement 17 –Norfolk is identified as an area of serious water stress, the Norfolk Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Individual authorities may also wish to consider the inclusion of a specific water efficiency BREEAM standard for commercial development within their Local Plans. Improved water efficiency is not limited to measures within dwellings and commercial buildings and a collaborative approach to promote innovation in water efficiency/re-use is required working closely with water companies and site promoters/developers.

The disposal of waste water can be more challenging and impacts decisions on the location and phasing of growth. The capacity of sewage works, the capacity of receiving water courses and quality of outputs are all strategic issues.

It will be necessary to take a co-ordinated approach to water through water cycle studies to address water supply, quality, waste water treatment and flood risk. Flood risk assessments should be used effectively to ensure development is located appropriately, to help achieve this a Strategic Flood Risk Assessment (SFRA) has been commissioned jointly by most Norfolk authorities.

The release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from the new development to ensure that water quality is protected or improved, with no detriment to areas of environmental importance. Growth in several parts of the county is dependent on investment at sewage treatment works. The timing of these investments will have an important effect on the phasing of development.

Agreement 18 –The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure.

In considering the distribution of growth Local Planning Authorities will need to ensure that distribution avoids cumulative detrimental impact on the most sensitive water courses particularly, those in the Broads and on the Wensum which cross a number of Local Planning Authority boundaries. Each public body will have regard to River Basin Management Plan⁵¹ to ensure that their plans and actions do not risk delivery of the environmental objectives for each water body in the County (not just protected sites).

7.5 Telecoms

Broadband

Having access to high-speed and reliable broadband is now regarded as essential by many residents and businesses. The picture regarding superfast broadband coverage is rapidly improving, nearly 88% of the county's homes and businesses can now access superfast broadband, up from 42% in 2012⁵², and through the extension of the Better Broadband for Norfolk (BBfN) programme it is aimed to make high-speed broadband available to more than 95% of Norfolk's premises by spring 2020.

The BBfN project was launched in 2012, with the aim of ensuring that by the end of 2015 more than 80% of Norfolk's premises could access superfast broadband (24 Mbps download, also known as Next Generation Access (NGA)). A second phase of the project, the Superfast Extension Programme, will help Norfolk reach the national target of 95% of UK homes and businesses by March 2018, which the Government has subsequently brought forward to the end of 2017.

It is difficult to get accurate maps showing currently available download speeds across Norfolk, as the situation is changing constantly. But a map produced by Better Broadband for Norfolk (BBfN) in 2016, and reproduced below, shows the availability of Next Generation Access (NGA) broadband across the county⁵³.

⁵¹ See <https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan>

⁵² See Better Broadband for Norfolk Information Sheet 26 (26 May 2017)

⁵³ Interactive up to date maps are available at <http://www.betterbroadbandnorfolk.co.uk/>

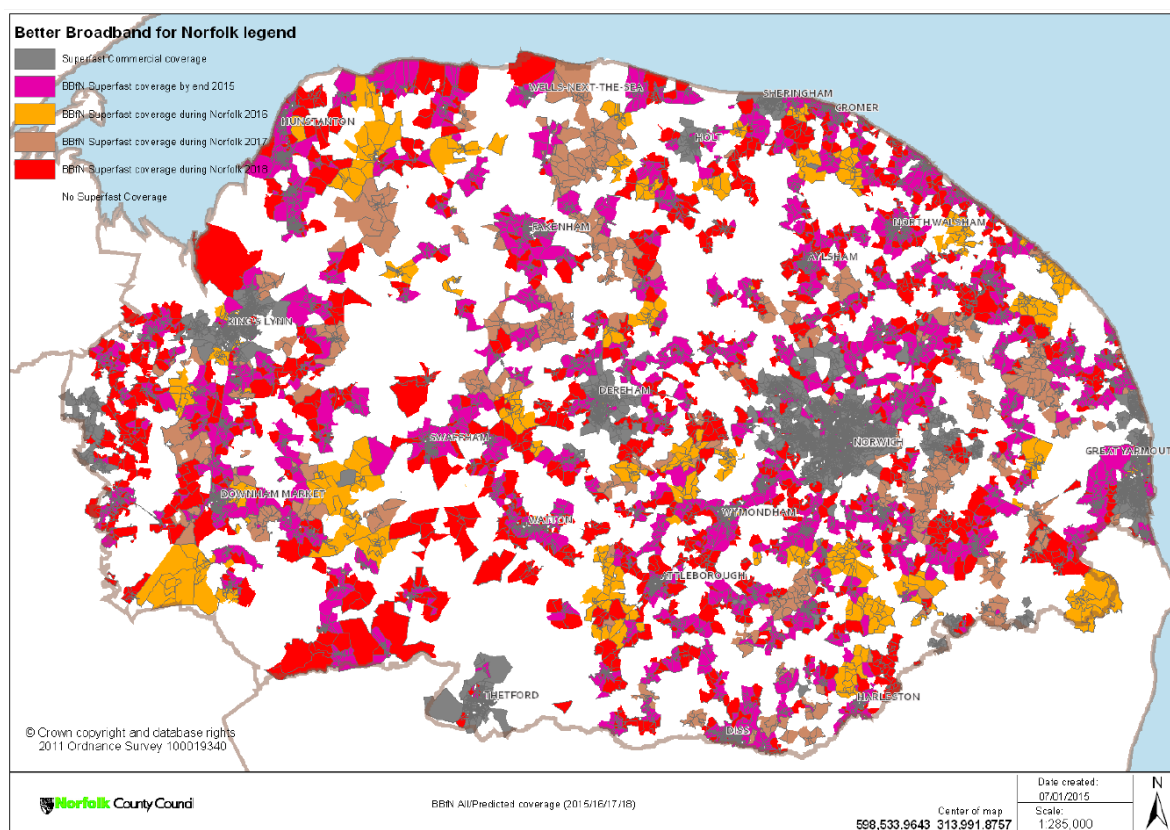


Figure 7: Map showing Next Generation Access (NGA). White areas don't have NGA broadband services.
Source: Better Broadband Norfolk, 2016

Areas where the existing broadband connection speed is less than 2Mbps are classed as “basic” broadband connections, and are not scheduled to receive improvements in the immediate future. However, they can apply for a subsidy towards the installation and setup of a satellite broadband solution.

In order to extend the provision of superfast broadband further, additional funding would be needed. Where this is not possible or feasible, wireless (Wi-Fi) solutions can be investigated as well as satellite broadband, although it is recognised that there will be many parts of the county where these are not currently practicable.

In April 2016, changes to Building Regulations R1⁵⁴ were finalised. For applications made on or after 1 January 2017 new buildings are required to have physical infrastructure to support high-speed broadband (greater than 30Mbps). However, there is no requirement to provide external or site-wide infrastructure beyond the access point.

⁵⁴ See

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/517789/BR_PDF_AD_R_2016.pdf

The availability of high-speed broadband is clearly of major strategic significance for Norfolk. The further rollout of broadband cannot be required through any current Local Plan, but the Norfolk authorities work closely with Better Broadband for Norfolk and other bodies and providers to ensure that high-speed broadband is delivered to more parts of the county as soon as is practicable. Emerging Local Plans will consider the extent to which they could require high-speed broadband to be delivered as part of new developments; the revised National Planning Policy Framework (NPPF), which is due out in spring 2018, might make this easier. The Authorities will also engage proactively with broadband and mobile network providers to better encourage the rollout of new infrastructure, particularly Openreach, and will seek to involve Openreach at the pre-application stage of major residential and commercial planning applications, as well as through consultations on the emerging Local Plans.

Mobile telephony

Mobile telephone connectivity has, like broadband, become increasingly important. The most significant change in recent years has been the rollout of 4G services.

Coverage in Norfolk

Interactive mapping (available from Consumer Group Which⁵⁵) shows the general coverage for 2G, 3G and 4G data across Norfolk. The majority of areas across Norfolk receive a weak 2/3/4G signal, with the strongest signals in Norwich and market towns such as King's Lynn and Great Yarmouth. However, this data must be treated with degree of caution as the results are high-level and there are large areas where data is unavailable.

Nevertheless many mobile "not-spots" remain in Norfolk (some rural areas and parts of the coast in particular), particularly for 4G data coverage, although there are plans to improve this: for example, EE announced in 2016 that it intends to achieve 95% UK geographical coverage by 2020.

The next generation of mobile networks will be 5G. Whilst there is no agreement as to the precise standards of 5G, it will probably encompass the following:

- 60-100 times faster than 4G Instantaneous playback from downloading speeds and
- Sufficient bandwidth to enable a multitude of internet-connected devices to communicate effectively.

5G uses higher frequency radio bands which travel less well than 4G, and can be disturbed by buildings, trees, weather etc. Significantly more base stations, booster stations and new antenna technologies will be required. The rollout of 5G commercially is expected to commence in 2020, and take several years to complete. Getting high quality 5G infrastructure rolled out across Norfolk will be important to delivering the vision of the NSF.

By the time most of the next rounds of Local Plans have been adopted, 5G will be a reality (2020). The main benefit of 5G is that it could, in theory, provide ultra-high speed broadband access to all, without the bandwidth capacity challenges of 4G. This should enable location to be much less of a

⁵⁵ <http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map>

barrier to receiving broadband than previously, with benefits for homeowners and businesses. It could remove a barrier to location of employment opportunities, particularly home-based and rural-based businesses.

The main disadvantages appear to be that further base and booster stations will be required to ensure adequate coverage. As with 4G, it is likely that commercial considerations will play a role in coverage (particularly in the early days of 5G) but authorities will do all they can, through liaison with mobile providers, to ensure that rural areas of Norfolk get 5G as early as possible.

The key conclusion is that some consistency of approach from all Norfolk Planning Authorities is clearly important for 5G if the very high degree of nationwide coverage required for 5G to be effective is to be secured. Broadly, it should be made as straightforward as possible for 5G base stations and transmitters to be constructed, and common development management policy text to facilitate this should be explored, taking into account material planning considerations. In particular, care will need to be taken to ensure that new telecommunications equipment is sited and located sensitively in respect of the public realm, street-scene, historic environment and wider landscapes.

Agreement 19 - To maximise the speed of rollout of 5G telecommunications to Norfolk, the Local Planning Authorities will seek to engage with the telecommunications industry to produce shared guidance on the location of base and booster stations for the 5G network, taking into account material planning considerations. The aim is to get this guidance agreed before the end of 2018 with it potentially being included in emerging Local Plan documents.

7.6 Social Infrastructure

Health

The National Planning Policy Framework (NPPF) requires Local Planning Authorities to ensure that the health and wellbeing of the population, and health infrastructure is considered in plan and decision making.

The need for health infrastructure provision takes place in the context of:

- An increasingly ageing population, with impacts on health and social care provision and costs⁵⁶
- The number of premature deaths increasing, caused by smoking, lack of physical activity, obesity and alcohol misuse. In 2009/10 alone, physical inactivity cost local healthcare authorities £6.2 million per year⁵⁷.
- Increasing problem of obesity and associated costs. A quarter of the UK's population is obese costing the tax payer £2.47bn a year⁵⁸, and if current trends continue over 50% of the population is predicted to be obese by 2050⁵⁹.

⁵⁶ The King's Fund: Future Trends, Demography, Ageing Populations

⁵⁷ British Heart Foundation, 2013: Economic costs of physical inactivity.

⁵⁸ Institute of Economic Affairs, 2017: Obesity and the Public Purse.

⁵⁹ NHS, 2015: "Britain: The fat man of Europe"

- Increase in demand for mental health and wellbeing services which continue to be affected by cuts.⁶⁰
- Changing approaches to healthcare delivery.

It is clear that health issues will become increasingly important considerations in the future planning activities. Therefore, development should facilitate a healthy lifestyle and provide opportunities for a high quality of life through a healthy environment where pollution is controlled and there is adequate access to open spaces and Green Infrastructure. Availability of suitable and affordable housing and employment opportunities are also important factors.

To ensure this happens work has been undertaken on developing a protocol for joint working between planning, public health and health sector organisations since 2015. Throughout this period support has come from several quarters, including each of the Norfolk Clinical Commissioning Groups (CCGs). The Protocol seeks to explain the relationship of land-use planning to public health, giving an overview of the planning system to health professionals and an overview of health service commissioning structures to land-use planners. There are mutual commitments to discuss development-related pressures on healthcare services and opportunities for high-quality place-making to enable people to make healthier lifestyle choices. The Protocol also includes NHS England giving the opportunity for monitoring how population change from housing development could have an impact on all aspects of acute and primary care services across Norfolk.

The Protocol seeks for health professionals and town planners to work together to secure new healthcare facilities required as a result of development. To assist with such negotiations, appended to the Protocol is population modelling data to give an indication of future healthcare requirements for Norfolk. Based on each CCG area, projections are given on future demand for acute hospital beds, intermediate care beds, and the numbers of General Practitioners required. The population increases are modelled on low, medium and high scenarios for house-building rates, reflecting the uncertainty as to how economic conditions might affect the house-building industry in coming years. The second appendix to the Protocol is a *Health Planning Checklist* that consists of six place-making themes. Use of the Checklist is not mandatory; it is simply made available to all practitioners as a convenient method to appraise development schemes in advance of, or at the point of, making a planning application.

Agreement 20: The authorities agree to endorse *Planning in Health: An Engagement Protocol Between Local Planning Authorities*⁶¹, *Public Health and Health Sector Organisations in Norfolk* and undertake its commitments.

Assuming this is formally agreed it is expected that each Norfolk CCG will formally agree the Protocol via its Governing Body, and NHS England will do via senior officer support.

⁶⁰ Norfolk Community Foundation, 2016: New mental health and wellbeing ‘match funding challenge’ for Norfolk.

⁶¹See https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/Health%20Protocol%20Final%201.2docx.pdf

Education

Norfolk's School Capacity return to the DfE (SCAP) indicates that Norfolk's school population will continue to grow over the next 10 years.

Primary age population including the influence of housing with full permission will rise by around 4% and secondary by 22% (children currently in the school system including the additional 4% covered by growth). Further housing coming forward is likely to produce a higher increase percentage.

More specifically, September 2017 school population is over 1300 more than in 2016. Year 10 currently has the lowest cohort of children and numbers have risen steadily since 2006 when that cohort joined the school system in reception. September 2016 reception cohort was nearly 800 pupils higher than it was 5 years ago. Recent years have seen a significant rise in the birth rate and demand for pupil places across the area. Pressure is mainly in urban areas which have seen the highest concentration of population growth. The speed of delivering houses is key to the requirements of school places so careful monitoring of housing progress is undertaken between County Council/District/Borough Councils.

Standards in Norfolk schools have risen considerably over the past 5 years with 88% of schools being graded Good or Outstanding in 2017 compared with 70% 4 years ago. The Local Authority retains responsibility for ensuring that there is a sufficient supply of school places and works with a range of partners, e.g. Dioceses and Academy Trusts to develop local schemes.

Norfolk County Council's School Growth and Investment Plan, published every January identifies three growth areas requiring more than one new primary phase school and a further 10 areas requiring one new school. Expansion to existing schools will also be required in some areas of the County. A new High School for north east Norwich is also being discussed and planned.

However, it is difficult to summarise what the strategic infrastructure priorities are and who will deliver against these. Also in the light of recent planning decisions it is questionable to what extent primary and secondary education provision can be seen as a constraint on residential development. Nevertheless the following is agreed:

Agreement 21: The Local Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

7.7 Transportation

Considerable work has been completed in relation to transportation matters in support of the NSF. Notwithstanding the recent and very welcome announcements for further investment in infrastructure there will be a need for considerable further investment in transport infrastructure if this is not to constrain growth.

A background paper has been produced summarising the state of the County's transport network, providing much of the evidence base for the production of the NSF and subsequent Local Plans⁶². The paper aims to identify: the current state of the transport system; the constraints (current and future); and opportunities and includes a review of transport constraints to identify issues that, without resolution, may prove a barrier to growth.

Current Network

Norfolk is served by two trunk roads: the A11 from London and Cambridge, and the A47 from the west. The A47 continues from Great Yarmouth to Lowestoft. The A11 is fully dual carriageway and the corridor will see some of the largest scale growth planned in the county (at Thetford, Attleborough, Wymondham, Hethersett and the Norwich fringe at Colney/Cringleford). The A47 is a mix of single and dual carriageway, both within and beyond Norfolk.

Away from the strategic road network, Norfolk's road network is a largely rural, single carriageway network. Much of it has not seen significant improvement schemes and so journey times can be slow, particularly away from the higher standard A-class network.

⁶² See https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/NSFTTransport_OutputV4.docx

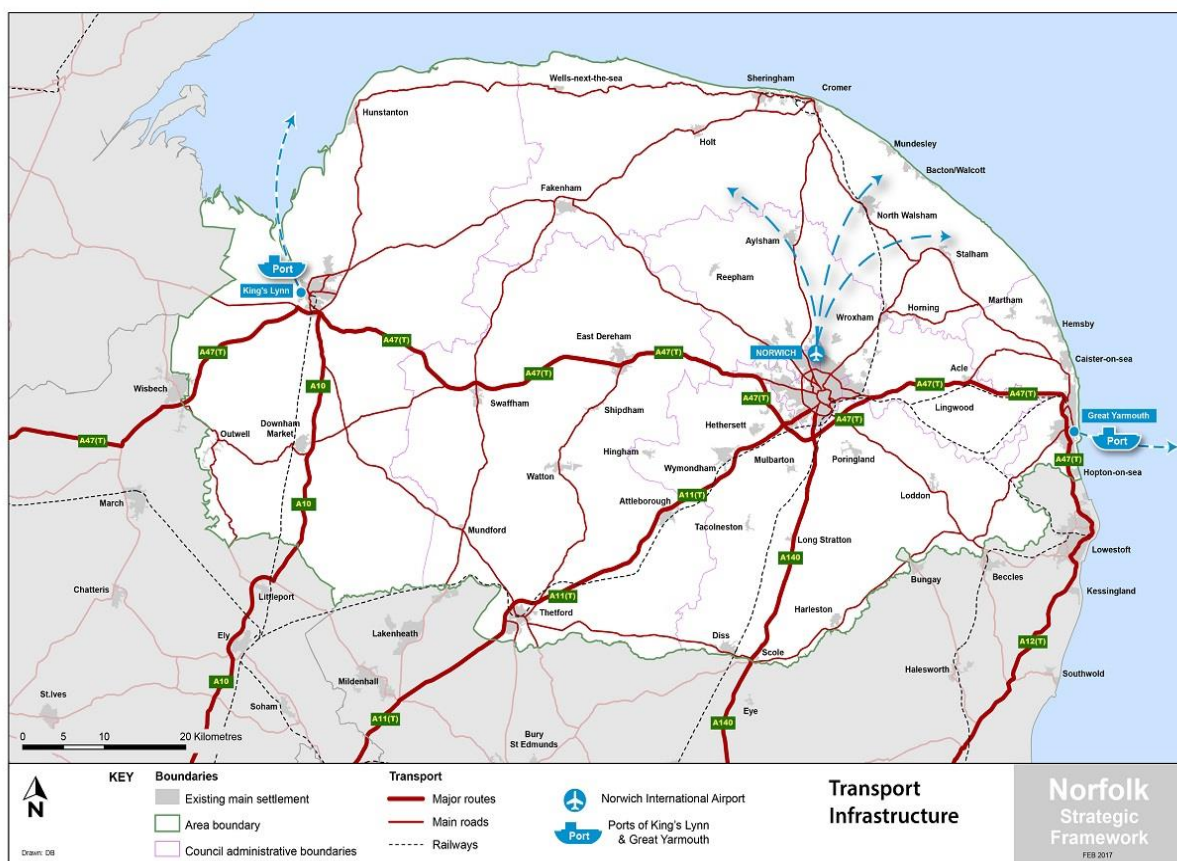


Figure 8: Norfolk Transport Infrastructure, 2017

Norfolk has a limited rail network, meaning that many of its towns are not served by rail. Also, the services offered provide a very limited range of destinations and frequencies. In particular, services to the Midlands and Home Counties are poor. Whilst rail generally provides faster journeys to other major centres compared to road, average rail speeds compare poorly with connections between major centres out of the County.

Norwich Airport is situated some 5km north of Norwich city centre. It operates a number of scheduled and charter flights and provides servicing for the offshore energy industries via helicopter flights. The airport terminal has capacity for 700,000 passengers per year. The airport is current consulting on a draft masterplan which envisages considerable growth in the coming years⁶³.

Great Yarmouth is the largest port in the county, seeing over 1,100 thousand tonnes of traffic in 2014, an increase of over 1/3 compared to 2013. Although 66% of this by tonnage is inward traffic there has been a tenfold increase in outward traffic since 2009, meaning that increasingly outward traffic has become more important to the port.

Levels of both walking and cycling to work are relatively high in Norwich. In South Norfolk and Broadland Districts levels of walking are comparatively lower than elsewhere in the county, probably

⁶³ See <http://www.norwichairport.co.uk/masterplan/>

reflecting that many people from these districts work in Norwich - too far to walk. A comprehensive cycle network has been identified in Norwich, and the city has also benefited from a large amount of funding that has been used to upgrade parts of the cycle network. There is still however a considerable amount of work required to upgrade the network in its entirety.

Accessibility by public transport to services and facilities is problematic in some more rural and isolated parts of Norfolk. Overall, accessibility tends to be poorest in the more rural districts of Breckland and West Norfolk, where there is a significant number of smaller villages, hamlets and isolated dwellings. Providing bus services within these smaller settlements is often unviable due to low population numbers.

Table 11 below lists some of the main committed road and rail projects that are planned to take place in Norfolk in the coming years. It will be important to ensure the timely implementation of these projects.

Table 11: Committed Transport Projects

Project Name	Estimated Start date	Estimated Cost	Funding sources
Norwich Northern Distributor Road	Started, open early 2018	£178 million	Funded - Government grant, growth deal and a local contribution
A47 Great Yarmouth Junctions	2018	TBC	Funded - Highways England Roads Investment Strategy 1 (2015-2020)
A140 Hempnall Roundabout	2019	£4.4m	NPIF, CIL, Developer funding, Growth Deal
A47 Blofield to Burlingham Dualling	2020	£50-£80 million	Funded - Highways England Roads Investment Strategy 1 (2015-2020)
A47 Easton to Tuddenham Dualling	2020	£100-£150 million	Funded - Highways England Roads Investment Strategy 1 (2015-2020)
A47/A11 Thickthorn junction	2020	£70 to £100 million	Funded - Highways England Roads Investment Strategy 1 (2015-2020)
Great Eastern Mainline enhancements⁶⁴	Up to 2020	Unknown	Network Rail and Train Operating Company (Abellio)
Fen Line Service Enhancements⁶⁵	Up to 2020	Unknown	Network Rail and Train Operating Company (GoVia)

Timely delivery of the above list of commitments will doubtless serve to stimulate the local economy and enhance the prospects of delivery of planned growth. Whilst the growing recognition of the

⁶⁴ Existing services on the Norwich to London line are operated by Greater Anglia as part of the East Anglia franchise. Services operate every ½ hour (more in peak times) with a journey time of around 1 hour 50 minutes. As part of the recent franchise agreement, services will be upgraded to every 20 minutes; there will be new rolling stock; and some services will have journey times of 90 minutes

⁶⁵ Existing services on the Kings Lynn to London via Cambridge are operated by GoVia as part of the much larger Thameslink, Southern and Great Northern franchise. Currently services from King's Lynn operate every hour to London King's Cross, though they are ½ hourly at peak times. The franchise commitment for GoVia is to run ½ hourly services throughout the whole day from spring 2017, except that, on a maximum of two occasions each day, services can run hourly to allow for freight train usage of the line. For further details of Network rail's King's Lynn-Cambridge 8-car scheme.

need for further development of Norfolk's infrastructure is very welcome because of its contribution to the delivery of the objectives of the NSF there remains a considerable need for further infrastructure investment in the County if the vision in this framework is to be realised.

Further details of some the schemes thought to be necessary in addition to the above commitments are set out in the sections below. These are focussed on certain priority schemes where it is considered that effort in the short term may result in a realistic opportunity to secure funding for delivery in the short to medium term.

Furthermore, the background paper produced identified three key strategic issues affecting the County including: the relatively poor transport connectivity between our main settlements and destinations outside Norfolk resulting in long journey times; the poor connectivity within the County particularly for east-west journeys, exacerbated by congestion and unreliable journey times on parts of the network (especially the A47) adding to business costs; and difficulties in delivering major enhancements to transport networks within our urban areas and market towns which tend to have historical street patterns where the scope for major improvements is limited.

It should also be noted that the area of transport is considered to be an area where new technology may have a particularly significant impact during the duration of this framework and this makes predicting the full range of enhancements to travel networks difficult at this stage.

It is clear that providing suitable transport provision to meet the needs of existing and future populations while reducing travel need and impact will be one of the greatest challenges faced by Norfolk in delivering the level of growth that is anticipated over the coming decades. Given the overall scale of growth that is planned across the County a key matter will be ensuring that transport is a significant consideration in locating this growth and development levels are maximised in areas that are best served by transport networks and have the greatest potential for promoting the use of non-car based modes.

Improvements needed

The tables below set out some key shared priority schemes for transportation improvement that the Councils will work together to promote for funding. These projects reflect key infrastructure needed to deliver economic growth in Norfolk and will help to co-ordinate implementation, prioritise activity and respond to funding opportunities. Local Authorities have agreed to these projects being priorities which shall be promoted with focus on further work needed on business cases to promote the schemes for capital funding. It should be noted that in relation to transportation matters there are significant packages of infrastructure investment planned in a number of urban areas (the largest of which is the Norwich Area Transportation Strategy). Each of these could be considered to be strategically significant and unlock considerable housing and economic development potential but are typically better viewed as an amalgam of more localised improvements which will be funded from a variety of sources over many years and so are not included in the lists over the page at this stage.

Table 12: Priority Road Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Norwich North-East Link Road	2017	£29m	Developer funding, Growth Deal, CIL, LIF
A140 Long Stratton Bypass	2019	£30m-£40m	Developer funding, Growth Deal, CIL
A10 West Winch Relief Road	2019	£45m	HCA, developer funding, Growth deal
A47 Hardwick Junction King's Lynn	2019	£25m	HCA, developer funding, Growth deal
Attleborough Link Road	2019	£12m	Developer funding, Pinchpoint bid, Growth Deal
A11 Thetford bypass junctions	2020	Not Known	Pinchpoint bid, Highways England Roads Investment Strategy 2 (2020-2025)
A47 Wisbech Bypass Junctions	2020	Not Known	Pinchpoint bid, Developer funding, Highways England Roads Investment Strategy 2 (2020-2025)
Great Yarmouth Third River Crossing	2021	£140m	Growth Deal, Local Major Transport Scheme, LA
Norwich Western Link (A47 to NDR)	2023	Not Known	Growth Deal, Local Major Transport Scheme
A47 Acle Straight dualling	2025	£120m	Highways England Roads Investment Strategy 2 (2020-2025)
A47 Tilney to East Winch Dualling	2025	£140m	Highways England Roads Investment Strategy 2 (2020-2025)

Table 13: Priority Rail Projects for promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Norwich to London rail (Norwich in 90)	2019-2024	Circa £300 million	Network Rail Control Period 6
Great Yarmouth Rail Station	2019-2024	Not Known	Network Rail Control Period 6
Ely area enhancements	Around 2020	Not Known	Network Rail Control Period 6, Growth Deal 3 (required to fund development work for early (2020) delivery)
Broadland Business Park station	Mid 2020s	£6.5 million	Growth Deal 3
East West Rail (Cambridge to Oxford)	Late 2020s	Not Known	Government via special purpose delivery vehicle

In the consultation on the NSF a number of respondents suggested that the Local Authorities ought to formally agree a high level strategic approach to transport as a formal agreement within the final NSF. Although it has not been possible to produce such an agreement for inclusion in this document further consideration will be given to this matter in 2018 with a view to including such an agreement in future iterations of this document.

7.8 Flood Protection and Green Infrastructure

Flood Protection

Flood protection is a significant issue for Norfolk. Significant parts of the County are vulnerable to tidal, fluvial or surface water flooding from extreme weather events. Such events can pose a significant risk to life as well as property and affect, to a greater or lesser extent, the three main settlements in the County which all developed in their locations due in part to their access to tidal waters.

Much of the Norfolk coastline is reliant on flood defences to minimise flood risk to existing development. Considerable further information on the planned interventions that are necessary in order to protect our communities from coastal flooding are set out in the Coastal Evidence (Flooding and Coastal Erosion) background paper that is published in support of this draft NSF⁶⁶.

UK Government studies have concluded that climate change over the next 100 years is likely to result in hotter, drier summers and warmer, wetter winters, with more extreme weather events including droughts, floods and sea level rise increasing the level of risk from flooding that is faced by communities in Norfolk.

To address these strategic issues it will be necessary to take a co-ordinated and proportionate approach to managing flood risk. Flood risk assessments are to be used effectively to ensure development is located appropriately and away from flood plains wherever possible. Developers will need to work closely with the relevant public authorities risk management authorities in minimising flood risk from all sources through a combination of high quality urban design and green infrastructure, as well as use of Sustainable Drainage Systems (SUDs) forming part of the overall design of developments. Early engagement with the relevant risk management authorities is required prior to the submission of some planning applications. Further guidance on how this will be done is available on the County Council website due to its role as the Lead Local Flood Authority for the County⁶⁷.

⁶⁶ See https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/Infrastructure%20Group%20Coastal%20Paper%20DRAFT%20V7%201.docx

⁶⁷ See in particular <https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf>

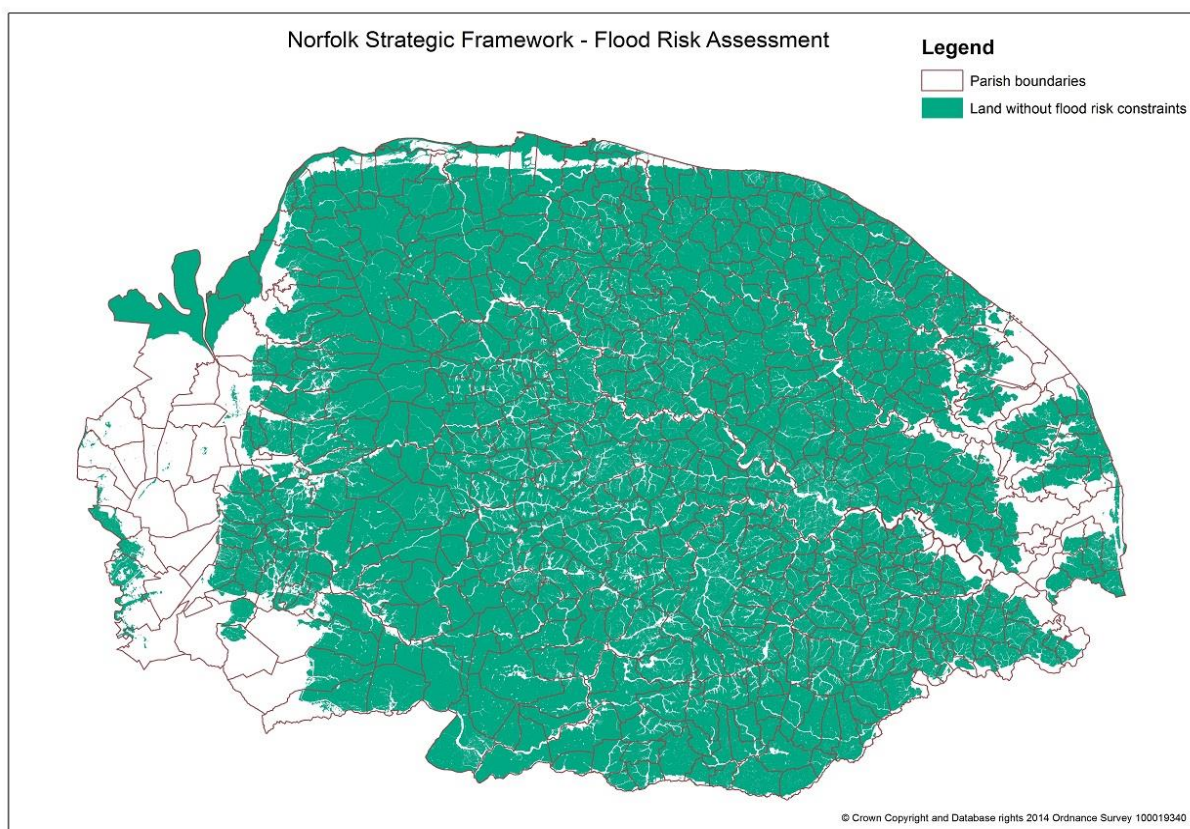


Figure 9: Norfolk Flood Risk Map. 2016

Figure 9 provides an illustration, at a broad scale, of the extent of land with and without flood risk constraints. Whilst it is clear that significant areas of the County are free from flood risk constraint it should be noted that many of the currently developed urban areas are at some risk of flooding. It will be important to ensure that a pragmatic approach is taken for new development and flooding as if planned correctly new development can significantly reduce the flood risk faced by existing communities in these areas.

As flood waters do not respect administrative boundaries there will be a need for the Norfolk Planning Authorities to continue to work closely together on assessing and minimising flood risk as well as on responding to emergencies when they do occur. For example, the Broadland Futures Initiative is a strategic project to explore how best to manage flood risk in the inter-related areas of the Norfolk and Suffolk Broads, the coast between Eccles and Winterton (which protects the Northern Broads) and the entrance to the Broads system through Great Yarmouth. The project will guide decision making over the short, medium and long term.

A number of significant investments have recently been made or are planned in the near future to help alleviate flood risk. These are detailed in Local Plans, coastal management plans and strategic flood risk assessments and included in the county wide IDP.

Table 14: Priority Strategic Flood Defence Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Great Yarmouth Tidal Defences 2017 onwards (Epoch 2)	2026	£27-76 million	LEP, Local Authorities and Local businesses
Bacton Walcott sandscaping scheme	2018	£19.3m	Public sector, Regional Flood and Coast Committee, Environment Agency, Defra, NALP, private sector

Green Infrastructure and the Environment

Green infrastructure (GI)⁶⁸ is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of economic, environmental and quality of life benefits for local communities. The provision of green infrastructure in and around urban areas helps create high quality places where people want to live and work. New GI can also mitigate impacts on existing sensitive sites and support heritage and conserve the historic environment. Access is an integral part of GI and PROW and 'Norfolk Trails' are an important asset.

The area has a wealth of environmental assets ranging from international and national status, to those of local importance. These must be safeguarded and enhanced for the benefit of current and future generations. Many of Norfolk's natural habitats have been lost and fragmented with once extensive areas of habitats reduced to small remnants isolated from each other and surrounded by relatively inhospitable land uses, reducing biodiversity and increasing vulnerability.

⁶⁸ The definition of GI is set out in the Natural England document GI Guidance (<http://publications.naturalengland.org.uk/file/94026>). In terms of the NSF it includes 'blue infrastructure' ie water environments - rivers, lakes, ponds etc.

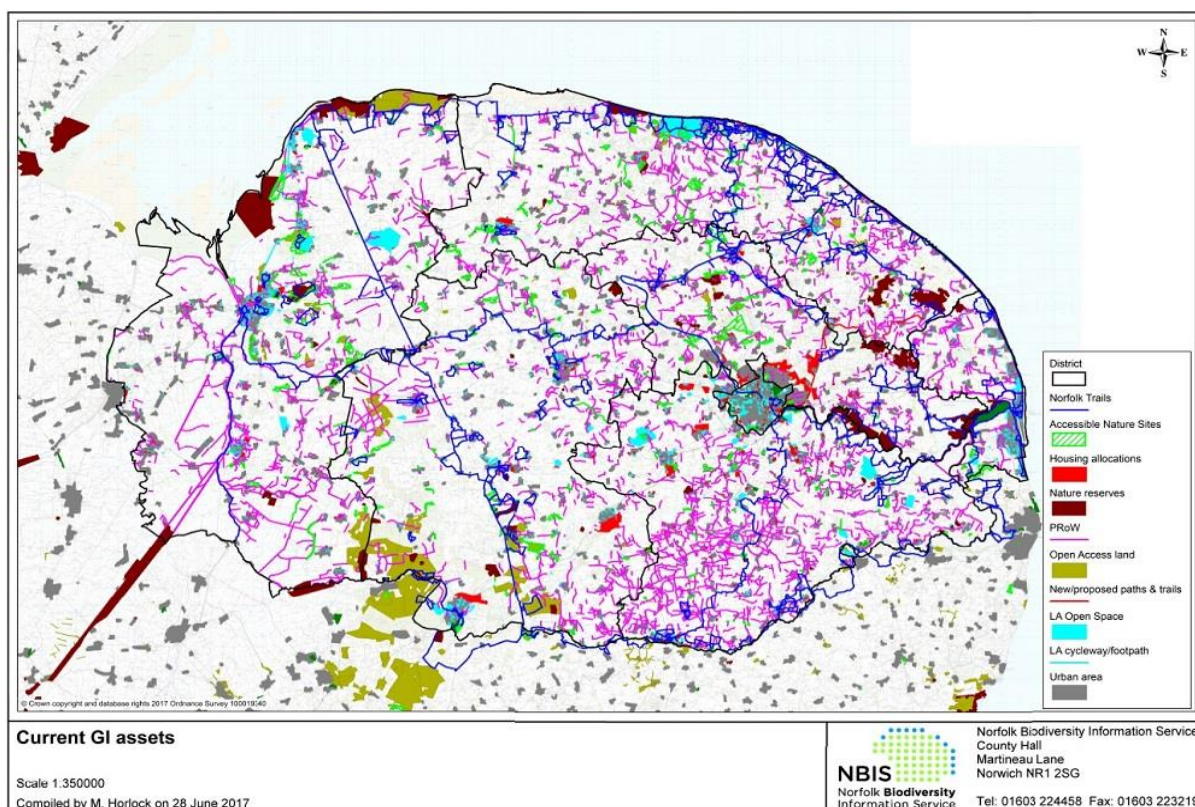


Figure 10: Norfolk's current GI assets. 2017

Current GI assets are set out in Figure 10⁶⁹. Green infrastructure should be provided as an integral part of all new development, where appropriate, alongside other infrastructure such as utilities and transport networks.

Planning for green infrastructure should occur at the evidence gathering (survey and analysis) stage of the planning process, so that green infrastructure responds to character and place, and that standards are set for green infrastructure accessibility, quantity and quality. Early integration of green infrastructure can also ensure that it is properly planned in advance of development or delivered alongside development on a phased basis. In this way green infrastructure can be planned as an integral part of the community. (Natural England Green infrastructure guidance, P43)

As Norfolk grows and changes in terms of its demographic profile considerable investment in the provision and maintenance of a GI network will be needed in order to facilitate and support growth whilst also:

- Minimising the contributions to climate change and addressing their impact;
- Protecting, managing and enhancing the natural, built and historical environment, including landscapes, natural resources and areas of natural habitat or nature conservation value;

⁶⁹ Further more detailed maps are available from the NBIS website see <http://www.nbis.org.uk/sites/default/files/documents/Maps.zip>

- Ensuring existing and new residents many of whom may be elderly receive the health and quality of life benefits of good green infrastructure and are able to access appropriate recreational opportunities;
- Maintaining the economic benefits of a high quality environment for tourism; and
- Protecting and maintaining the Wensum, Coast, Brecks and the Broads.

As part of producing this Framework the authorities have commenced work on producing a GI strategy for Norfolk working with the Environment Agency, Natural England and the Norfolk Wildlife trust. This has produced:

- Accessible public open space and Countryside Access maps
- Ecological Network Maps
- Possible Green Infrastructure Corridors throughout the county (the 'GI network')

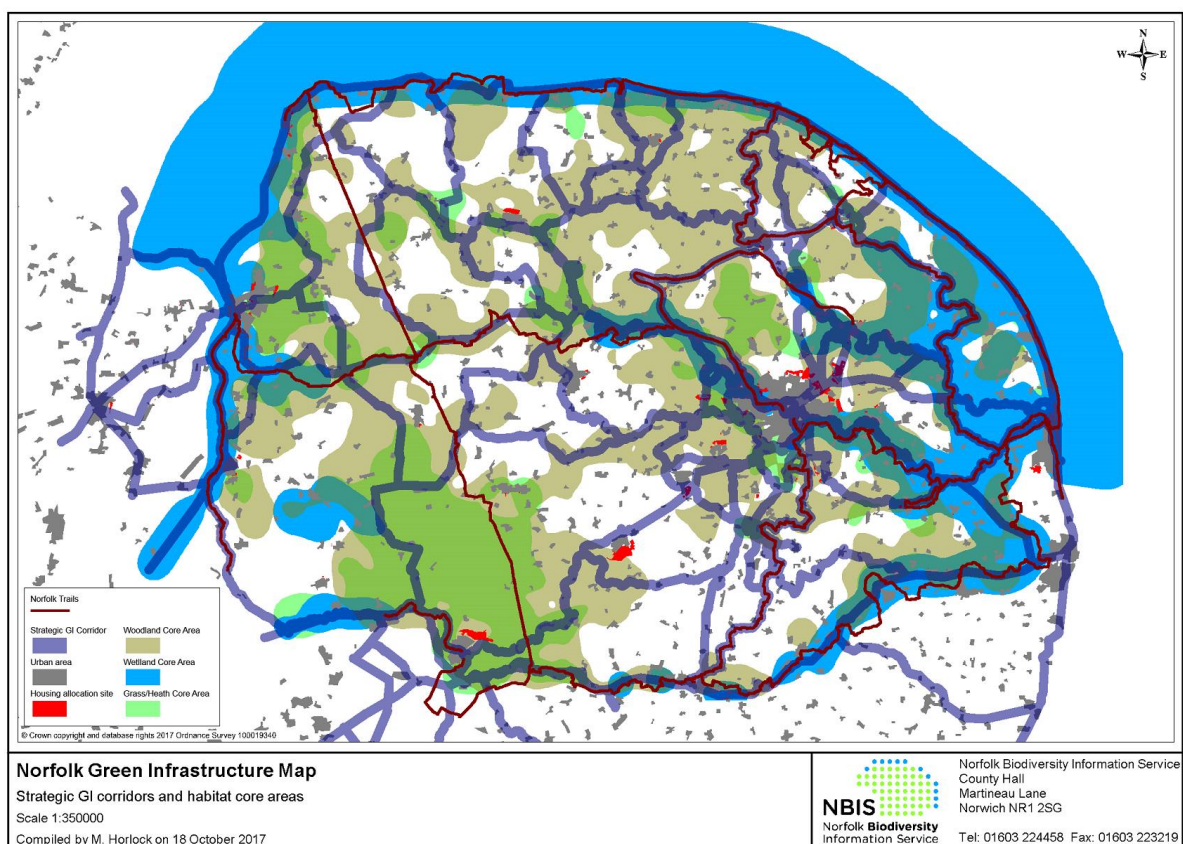


Figure 11: Norfolk's GI corridors. 2017

Figure 11 shows an emerging early draft of the identified potential Green Infrastructure Corridors. The intention is for this map to be further developed over the coming months and be incorporated into the Green Infrastructure Strategy. It should be noted that depending on the nature of corridor they may not constrain development, indeed in some circumstances promoting growth in these corridors may enhance their GI value.

One of the strategic aims for the Environment section is to 'protect, maintain and enhance biodiversity'. New growth in Norfolk must respect this aim, but the use of green infrastructure either existing or new can greatly aid the assimilation of new development. A commissioned report by Footprint Ecology on the impact of recreational pressures on Natura 2000 protected sites likely to

arise from new housing growth gave insights into the scale and location of that pressure. This is a complex area, many of the Natura 2000 sites attract large numbers of visitors, acting as green infrastructure, but are sensitive environments with specific legislative requirements. Mitigation measures and monitoring may be necessary, an action plan prepared by the Norfolk authorities is intended to address this in a co-ordinated way.

Agreement 22: In recognition of:

- a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;**
- b) the pressure that development in Norfolk could place on these assets; and**
- c) the importance of ecological connections between habitats**

the Local Planning Authorities will work together to produce a GI Strategy for Norfolk in early 2018 which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

With regard to the emerging priority projects for short term effort to bring forward, the following are likely to feature within the IDP.

Table 15: Priority Green Infrastructure Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
The Green Loop (Walking/cycling route linking Norwich – Aylsham – Hoveton –NE Growth Triangle)	Not Known	Not Known	
East Norwich Gateway – Yare to Whitlingham Country Park section	2019/20	£1.5m	SusTrans/DfT/Lottery/CIL

Section 8 – Next Steps

With the forthcoming publication of a revised National Planning Policy Framework and a possible requirement to apply a new standardised methodology to assessing housing need and produce statements of common ground it is clear that Norfolk's local authorities will continue to need to work closely together to address strategic planning matters. Furthermore, it is also clear that in addition to keeping the NSF itself under review there will need to be some consideration of whether the NSF remains the most appropriate vehicle to address strategic planning matters or whether more formalised statements of common ground or seeking to move towards the production of some form of statutory strategic plan would better serve the County.

Decisions on such matters will be taken during the first half of 2018 alongside the following activities:

Reviewing and updating the NSF:

- Update the NSF in light of the publication of the new NPPF scheduled for Spring 2018
- Enhancing areas of the NSF where time and resource has limited progress and where highlighted through the public consultation - such as follow up work on delivery issues, enhancing the economic chapter, including a transport agreement and further work around how elderly housing could be delivered.
- Once all Housing and Economic Land Availability Assessments are complete work with authorities, where required, where not all housing needs can be met
- Ensure NSF aligns to LEP Economic Strategy
- Monitoring NSF and maintain links to other authorities

Coordinate Joint planning activities:

- Build on the NSF and support the county in the production of a county wide Infrastructure Delivery Plan and any potential economic or growth strategies
- Production of statements of co-operation to inform Local Plan examinations;
- Production of statement of common ground
- Reviewing of Objectively Assessed Need for housing in light new government methodology
- Support of Local Plan Process
- Jointly commission evidence for local plans to create savings over commissioning evidence separately.
- Coordinate responses to consultations etc.
- Look to complete and maintain some policy work across the county eg OAN methodology, Brownfield register, production of common policies

In order to allow this work to proceed the Norfolk Authorities have agreed to the following:

Agreement 23: In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the signatories to this document agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

Appendix 1 – NSF Contacts:

Please direct all representations relating to the NSF to the NSF Project as detailed below. Use the Local Planning Authority contact details only if you have enquiries concerning a specific authority area.

NSF Project Manager	
Trevor Wiggett City Hall St Peter's Street Norwich NR2 1NH Email: trevorwiggett@norwich.gov.uk 01603 212557	
Breckland Council	Broadland District Council
Phil Mileham Strategic Planning Manager Breckland Council and South Holland Council Elizabeth House Walpole Loke Dereham NR19 1EE Tel 01362 656803 Email : phil.mileham@breckland-sholland.gov.uk	John Walchester Spatial Planning Manager Broadland District Council Thorpe Lodge 1 Yarmouth Road Norwich NR70DU Tel 01603 430622 Email : john.walchester@broadland.gov.uk
The Broads Authority	Great Yarmouth Borough Council
Natalie Beal Planning Policy Officer Broads Authority Yare House 62-64 Thorpe Road Norwich NR1 1RY Tel 01603 756050 Email : Natalie.Beal@broads-authority.gov.uk	John Clements Principal Strategic Planner Great Yarmouth Borough Council 2nd Floor, Town Hall Hall Plain Great Yarmouth Norfolk NR30 2QF Tel 01493 846624 Email: john.clements@great-yarmouth.gov.uk
The Borough Council of King's Lynn and West Norfolk	Norfolk County Council
Alan Gomm Planning Policy Manager Borough Council of King's Lynn and West Norfolk Kings Court Chapel Street King's Lynn PE30 1EX Tel 01553 616237 Email : alan.gomm@west-norfolk.gov.uk	Phil Morris Principal Planner Norfolk County Council Martineau Ln Norwich NR1 2UA Tel 01603 222730 Email : phil.morris@norfolk.gov.uk

North Norfolk District Council	Norwich City Council
Mark Ashwell Planning Policy Manager North Norfolk District Council Council Offices Holt Road Cromer NR27 9EN Mail : mark.ashwell@north-norfolk.gov.uk Tel 01263 516325	Graham Nelson Head of Planning City Hall St Peter's Street Norwich NR2 1NH Mail : grahamnelson@norwich.gov.uk Tel 01603 212530
South Norfolk Council	
Simon Marjoram Planning Policy South Norfolk District Council South Norfolk House Long Stratton Cygnet Court Norwich NR15 2XE Tel 01508 533810 Email : SMarjoram@S-NORFOLK.GOV.UK	

VISION & OBJECTIVES COMMENTS:

Response ID	Organisation	Answer	Officer Response	Action
ANON-3C85-CA87-P	Resident	Both are totally aspirational and hopelessly unrealistic in current Economic clime	Point Noted, however Norfolk authorities will work together to achieve the vision and objectives and monitor performance against these.	No change to NSF
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	I have no comment on Sect 2, but I ask that Agreement 1 at Sect 1.3 be amended to include: employment, economic, infrastructure and environmental needs. This shouldn't be limited to housing.	The wording used was to allow local plans that are not comprehensive (ie around specific targeted areas) to set different end dates where this is appropriate. Local plans would include all the elements highlighted but the wording is changed to make this clearer.	Update to Agreement 1 to include 'which seek to identify levels of Objectively Assessed Need for housing'
ANON-3C85-CA8T-K	Hockering Parish Council	It is essential that Norfolk retains its rural identity. Unsuitable housing developments and the dualling of roads must be seriously reduced or Norfolk will no longer be an area of outstanding natural beauty.	The NSF recognises the rural nature of the county and looks at ways to enhance this through the Green Infrastructure study completed as part of this work including the identification of Green Corridors.	No change to NSF
ANON-3C85-CAFT-1	Resident	If there is a clear desire to engage communities in development at a local level, significant changes will need to be made to processes which currently offer residents pre-decided choice (often none are suitable) and are presented in a way which is a barrier for many residents to read. The opportunities to engage (as this one is) are often only for the educated given the complexities of language and technical terms, meaning those who are often most negatively affected by development are least able to raise their own concerns.	Point noted and authorities will give consideration to this when completing local plans	Point to be highlighted to authorities
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	Much of Norfolk is too dependent on tourism/visitors. Let's accelerate the diversification and attracting high tech/high wage businesses. ie. Downham market is set to gain from the "Cambridge effect" leapfrogging over Ely and Littleport. Let's see more of it.ⓘ ⓘ However I fear they will be deterred by the poor rail link from Norwich and the indecision over services from Kings Lynn.ⓘ ⓘ That is before you consider the poor road network, North to South from mid and west Norfolk and even worse east to west from Norfolk to the midlands and heading northern England.	The points raised are noted, section 5 of the NSF supports diversification and attracting high tech/high wage businesses and various initiatives are being led by local authorities to encourage this eg Norwich to Cambridge Tech corridor, A47 corridor etc.	No change to NSF
ANON-3C85-CAXS-J	Resident	lack of infrastructure - improved roads, hospitals, GP's, faster broadband to facilitate business growth in the more rural areas, much better mobile coverage and of a higher standard - 3G/4G- is vital to achieve any objectives	The points raised are noted and supported within various sections of the NSF	No change to NSF
ANON-3C85-CAXF-5	N2RS - No to Relay Stations	I would agree that it is a largely rural county with a relatively low population density with a very considerable stock of historic assets which are now under threat.	Support Noted	No change to NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	The county is being changed forever by an overload of housing	Noted	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited supports the Proposed Spatial Vision and Proposed Spatial Objectives. Attleborough Land Limited understands Attleborough's strategic position in the context of the Breckland District Council Local Plan and Norfolk Strategic Framework. The SUE will be delivered in accordance with the Spatial Vision and Objectives. Attleborough Land Limited agrees that market towns like Attleborough can offer a very attractive quality of life to residents. Attleborough Land Limited is committed to ensuring that the SUE will enhance the quality of life for both existing and new residents. The attached Design & Access Statement sets out the Vision for the SUE, and explains the design evolution of the indicative masterplan submitted with the planning application. ADDITIONAL INFO SUBMITTED - Attleborough D&A Statement	Support Noted	No change to NSF
ANON-3C85-CAJG-R	Resident	The vision does not recognise that full time residents in North Norfolk have limited access to quality jobs, affordable housing, shops, swimming pools, roads and other public services which this summary suggests is already available in Norfolk.	The vision in the NSF is intentionally aspirational and forward looking so doesn't address the current infrastructure and economic disadvantages faced in the county. These matters are adequately recognised elsewhere in the document. The NSF recognises the rural nature of the county and looks at ways to address the issues.	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 2.1 It is not clear whether over half the population live in the built up areas of Norwich, Great Yarmouth and King's Lynn or whether the residents of the 21 market towns contribute to this half. ⓘ In the first paragraph of page 7 it says "there is a highly skilled and versatile population" but also says "skill levels in the workforce are relatively low." These must be different sections of the population.ⓘ Para 2.2 - the Spatial Vision - is obviously optimistic in particular with regard to housing needs and transport.ⓘ Para 2.3 - Shared Objectives - all 27 are laudable and should be supported but may well be difficult to achieve - particularly aligning job growth with housing provision and the locations of workplaces and homes. Car ownership is essential in the sparsely populated rural areas where public transport is non existent, owners will rely on Park & Ride services to access the built up areas. Developers are too ready to claim that costs involved in using brown field sites excuse them from the obligations of including affordable housing, so the proportion achieved is lower than anticipated.	Half the population covers Norwich, Great Yarmouth and King's Lynn and the 21 market towns. Point 2 and 3 noted.	No change to NSF
ANON-3C85-CA6U-J	Resident	Your Vision should include a railway reopening strategy to address the car crisis in Norfolk. There is big potential for reopening of some key routes (e.g. Norfolk Orbital Railway) to unlock tourism and employment opportunities and to relieve congestion.	One of the aims of producing the Norfolk Strategic Framework is to agree shared objectives and priorities to improve outcomes and help shape future plans. The introductory text to the document notes that “This document is intended to be strategic in nature. It provides only an overview of background information and shared research.” Section 7 goes on to state “Further work on infrastructure priorities will continue before the finalisation of the NSF but it should be noted that these short term priorities which are listed in this document will only represent a fraction of the overall infrastructure investment needed to deliver the growth ambitions of the NSF” Given this, I am afraid that, whilst the local authorities involved in producing the document might support the aims of the Melton Constable Trust and those of the community rail partnerships, the stage of the project (for orbital rail), the likelihood of it being achievable in the short to medium term, and its role in serving the transport needs of the county (when weighed against the projects within the framework such as Norwich to Cambridge rail) all mean that it is considered premature to consider it of sufficient strategic standing to merit detailing its inclusion in the framework. We are aware that the Trust has been speaking to the various local authorities including Norfolk County Council and are sure that continuation of this dialogue will help to move forward with the project.	No change to NSF

ANON-3C85-CA6V-K	Diss Town Council	It is felt there is insufficient reference to the infrastructure required to support the economy and employment. There is much reference to enhancing productivity, skills and education, co-locating future employment and housing and ensuring digital connectivity and transport infrastructure around 'main settlements' and connections with the other areas. But as there are existing issues where infrastructure is required to support current employment areas (ie Vinces Road, Diss), it is considered this ought to be given a stronger priority within the strategic framework as there may well be other areas where this is an issue. ¶ A proposed amendment to the wording of Agreement 2 is:¶ Its settlements and key infrastructure will be physically resilient to 'future growth and' the impacts of climate change.¶ ¶.and of the first bullet point at 2.3 would be:¶ facilitating the development 'and infrastructure' needed to support the region's business sectors and clusters...¶ ¶nder: ¶ To improve and conserve Norfolk's environment by: ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, protected landscapes, Broads and coast; ¶.it is felt that the river valleys are so important that they should be included at the first bullet point.	The first points made are noted but they are deemed to be a matter for local plans to address and not a strategic issue. The suggested section 2.3 change is agreed with and has been updated River valleys should already be protected by various local plan designations	Add 'and infrastructure' to Section 2.3
ANON-3C85-CA62-F	Resident	This section contradicts itself. It is simply not possible to "facilitate development" and improve and conserve Norfolk's environment, as development (especially large scale building of houses, business parks and roads such as the NDR) has an entirely negative effect on the environment.¶ Destroying green spaces does not "improve the quality of life", except perhaps for the developers themselves, who can afford to live in an area of the county that they haven't trashed. (The rest of us are stuck where we are.)¶ ¶he document mentions a "major shift in travel away from car use towards public transport, walking and cycling" but the NDR has removed the last quiet roads out of Norwich to the countryside (e.g. Smea Lane, Quaker Lane) and made safe and pleasant cycling in the north of the city a thing of the past.¶ ¶he document needs to include access to walks and cycle routes. "Ensuring all our communities are able to access excellent sporting facilities" is laudable but we need to encourage people to walk and cycle too. These are free, unlike organised team sports. There is sometimes a conflict between the two, as in Norwich Rugby Club's move to next to the River Yare at UEA, which will have a detrimental effect walkers' enjoyment of the area. (It will also add to traffic and parking problems.)¶	The thrust of this comment is disagreed with. Through provision of green infrastructure and high quality design it is possible to both increase the volume of development as well as the quality of life on offer to residents.	No change to NSF
ANON-3C85-CAJF-Q	Resident	The vision and objectives are laudable but are not entirely deliverable. It is better to not have as your vision and objectives things which are not in your legal ability to deliver. For example:¶ 1) Proposed spatial vision says "residents will have choice about how they meet their demand for local travel" - but this is reliant for most trips on a good bus service which is widely not available even in (certainly one of) the larger urban areas because of the business model of the private supplier of the services there. Are you proposing regulatory interventions to enable you to take over the provision of the County's bus service? If not, then you cannot, in practice, deliver your aspirations, no matter how worthy.¶ 2) Shared objectives include that by 2036 to realise the economic potential of Norfolk and its people "by fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge. However, the rail link between King's Lynn and Cambridge is being worsened - by design - from December 2018, and you are powerless to stop that happening. You cannot therefore, in practice, deliver your aspirations, no matter how worthy. ¶ 3) As (2) "by ensuring effective and sustainable transport infrastructure between and within Norfolk's main settlements. You may put in the infrastructure but service delivery, which is key to delivering this objective, is not in your hands but those of private transport suppliers. Additionally, in King's Lynn the only bus priority measure is now being considered for withdrawal and the section of road opened for all traffic which negates and sets back delivery of this objective in that town.¶ 4) As (2) to reduce Norfolk's greenhouse has emissions as well as the impact from, exposure to and effects of climate change by "locating development so as to reduce the need for travel" and "effect a major shift in travel away from car towards public transport, walking and cycling". Again, these aspirations are frustrated by the fact that you cannot deliver because you do not control the means of delivery. Even where you can influence it through (such as) section 106 agreements with developers, these are not enthusiastically delivered to really show intent to engage a major shift away from car, as evidenced in King's Lynn by both the NORA and Kings Reach developments.	Views noted but it is considered that having an aspirational vision and objectives is appropriate in a document such as the NSF.	No change to NSF
BHLF-3C85-CA6A-X	BA	¶ 6) The vision section (2.2) ought to refer to aspirations around the historic environment, health and low carbon aspirations. There could also be something about the County's assets like the Broads, Brecks and coast. 7) There does not seem to be reference to low carbon adaptation such as electric vehicles and the necessary infrastructure as it would seem to be a piece of development needing a strategic approach across the county. Although there is reference to climate change ¶ resilience and adaptation there is minimal coverage of how that will manifest itself. 8) Resource protection (soils, water quality and ecosystem services such as air quality ¶ regulation) does not seem to be mentioned. This would seem to be a critical part of a strategic framework. ¶ 9) The local distinctiveness of Norfolk is important to cultural identity and reflects local ¶ resources. There is limited reference to the value of retaining and enhancing this character ¶ as an underpinning element of attractiveness of places to live and work. ¶ 20) 2.3 Proposed Shared Objectives – could include sustainable development and protection of natural capital 21) p8 greenhouse gas emissions: there could be recognition of peatland protection within ¶ development and the role of soils and woodland in GHG emissions. The link to woodland and ¶ trees (location and area) and mitigating impacts of climate change and cleaning air quality ¶ could be made. ¶ 22) P9 To improve the quality of life – no mention of GI, nature and poor linkage between sections. 23) P9 To improve and conserve Norfolk's environment by... Amend to Norfolk's rich and biodiverse environment 24) P9 maximising the use of previously developed land within our urban areas to minimise the ¶ need to develop previously undeveloped land; Brownfield sites can have higher value for ¶ biodiversity and natural capital than some undeveloped land. ¶ 25) P9 where previously undeveloped land is developed, the environmental benefits resulting ¶ from its development will be maximised; ¶ 26) P9 protecting and, where appropriate, enhancing biodiversity through the preservation of habitats and species and creating new habitats through development; recommend to delete 'where appropriate'. The other objectives around e.g. saving energy are not qualified in similar ways. See also P58, agreement 20, delete 'where appropriate'. 27) P9 providing a network of accessible multi-functional greenspaces; ¶ 28) P9 reducing the demand for and use of water and other natural resources. ¶ 29) Add to this 'protecting water quality through enhanced sewerage schemes'. Add in 'soil and air' as natural resources.	6) vision currently reflects the importance of natural and built environments, and objectives go on to add detail on environmental matters. This is considered appropriate although it is noted that specific reference to the brecks could be introduced in the environment objectives. 7) Noted, this will be included within the infrastructure section. 8) Noted such matters are addressed generally by environment objectives but more specific reference is not consider necessary. 9) Agree and updated 20) Noted, matter covered by other objectives 21) Noted, specific matter to be addressed in local plans 22) GI and natural environment is addressed in objectives 23) Agree to change 24) Noted 25) Quote from NSF only 26) Agree to take out 'where appropriate' 27) Quote from NSF only 28) Quote from NSF only 29) Water quality covered by general reference to environmental aspects	Updates to NSF as follows: For point 6) include reference to Brecks in objective on Norfolk's environment. For point 7) section 7 will be updated to include a transport agreement which will make reference to electric vehicles 9) Update environmental objective to include locally distinctive 23) Update document where suggested 26) Update document where suggested 29) Add the following to the environmental objective: Protecting and enhancing water, air, soil and other natural resource quality where possible.
BHLF-3C85-CA34-E	Norfolk Geodiversity Partnership	Strategic Objectives (page 9) ¶ No mention of conserving geodiversity. This is a requirement, as per NPPF sections 109 and 117, so needs ¶ mentioning here. ¶ <protecting sites of geodiversity interest and, where appropriate, enhancing them as part of development.> ¶ If it is not mentioned as a separate bullet point then it needs adding to bullet point 1: ¶ <ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, geodiversity assets, protected landscapes, Broads and coast>.	Agree and reference to geodiversity is added to the Norfolk environment objective and in section 2.1.	Reference added to geodiversity in the Norfolk environment objective and in section 2.1.
BHLF-3C85-CA38-J	Pegasus Group on behalf of Intu	Suggested amendments:¶ 2.2 Proposed Spatial Vision¶ Introduce and additional sentence:¶ "Town centres will be the focus for the future retail and leisure needs of the county'.¶ ¶ 2.3 Proposed Shared Objectives¶ 1): To realise the economic potential of Norfolk and its people by:¶ Introduce an additional bullet point:¶ Recognising the role of town centres as a focus for investment and enhancing the quality of life for residents.¶ 4): To improve the quality of life for all the population of Norfolk by:¶ Introduce an additional bullet point:¶ ensuring a positive vision for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.	Regarding the first and third points, it was felt that these are better addressed by the suggested section 2.3 update, with a minor wording change. Therefore the section 2.3 update is agreed and included.	Update objective to include 'Recognising the role of city centre and town centres as a focus for investment and enhancing the quality of life for residents.'

BHLF-3C85-CA3P-A	Heaton Planning Limited on behalf of Brett Aggregates	Agreement 1 -The document sets a number of proposed ‘shared agreements’ for matters including economic development, housing provision, infrastructure provision and environmental matters. Given the strategic nature of the document and steer for development and growth, the agreement should not specify solely housing needs. We would suggest rewording the agreement as follows: ‘When preparing new Local Plans, the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036’. Agreement 2 seeks to ensure that in preparing Local Plans, the Norfolk Planning Authorities seek to positively contribute to the delivery of a shared vision. The aim of the document is to provide general conformity to planning matters/issues within the County over the Plan period. Despite the common growth agenda for the County, the document contains no reference to the provision of aggregate to meet the anticipated demands of development and infrastructure. This is in our view a fundamental matter for the County to consider in steering development over the Plan period. The County Council are committed to the objectives of the Strategic Framework, and the County/Mineral Planning Authority is intending to review the Minerals Local Plan to the same timescales -2036. There is no reference within the document to the need to provide for a ‘steady and adequate supply’ of minerals to meet the development and infrastructure needs of the County over the Plan period. In addition, although the District Authorities will not have statutory responsibility for Mineral Plan making nor determining applications for minerals development, all Planning Authorities have an obligation to safeguard known mineral resources as per the guidance contained within section 13 of the National Planning Policy Framework. In light of the above, we would suggest that the strategic vision should include reference to, ‘the safeguarding of mineral resources and the sustainable use of natural mineral resources’.	Agreement 1: Section 3.1 makes clear that this document does not seek to address the minerals and waste plan which is already addressed by the Norfolk wide Norfolk Minerals and Waste Local Plan, this is currently being produced and will cover the period up to 2036. Agreement 2: It is not considered necessary to amend the strategic vision of the NSF to contain the requirement to safeguard mineral resources and the sustainable use of natural resources because these requirements are already set out in the NPPF (paragraphs 7, 143 and 144) and therefore do not need to be repeated in the NSF. Local Plans must be consistent with national policy in order to be found ‘sound’ at examination. Agreement 3: It is not considered necessary to amend the shared objectives for Norfolk as suggested because they would simply be repeating the requirements of the NPPF (paragraphs 143, 144, 145 and 7). Local Plans must be consistent with national policy in order to be found ‘sound’ at examination.	No change to NSF
BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	Spatial vision The Spatial Vision (agreement 2) proposed in the Norfolk strategic Framework is that by the middle of the 21st century, Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. The natural and built environments will be enhanced through, inter alia, safeguarding of current assets and networks, improving both biodiversity and the quality of life for residents. A good relationship between homes and jobs is seen as minimising the need for travel which will be aided by digital connectivity with High Speed broadband planned to reach 95% of the population by 2020. To improve the quality of life for all the population of Norfolk it is intended to ensure that all communities are able to access sporting facilities and health services. Comment: Access to sporting facilities is clearly important. However for reasons stated in our comments above there will also be a growing demand, particularly from the over 50s, for access to facilities for safe walking and cycling in the open air and the attractive rural environment. Leisure walking is a more experiential activity than the journey based walking in the built up areas. This has implications for maintenance and development of the rural and suburban green infrastructure needed for these activities. It will also be influenced by any changes to agriculture and in the rural landscape on which the report is silent.	Agree and wording updated in objectives to include reference to informal recreation under quality of life objective. Please note that PROWs are part of GI in section 7 and will be referenced here.	Include reference to informal recreation under quality of life objective
BHLF-3C85-CA3U-F	TETLOW KING PLANNING	We note Agreement 1, which is an important starting point for each of the authorities to consider, and the June 2017 SHMA Update. However, in light of this month’s consultation from the Government on the potential changes to assessing housing need we note that there may be a need in the short term for a review of local housing needs. The Government’s consultation documents suggest there may be a greater annual need for a number of the local authorities to take into account, should the new methodology be adopted. Agreement 2 is also supported, as it provides a very clear ambition to meet local housing needs. Delivering housing that meets the full spectrum of housing needs requires developments to also reflect differing aspirations, as many people seek to own their own home. The Government’s intention for all major developments to be delivered with at least 10% affordable home ownership options will be met not only with the now traditionally accepted intermediate models, but also rent to buy. We note here that our response to the Housing White Paper earlier this year emphasised that rent to buy is not an intermediate model, but a hybrid that requires separate definition, as with a number of the other models set out in that consultation (at Box 4). It is important to note that Alok Sharma, Housing Minister, recently confirmed in the House of Commons that the new definition of affordable housing to be included in the next iteration of the NPPF is to include rent to buy. The SHMA update references the potential changes to the definition of affordable housing, and though this does not directly reference rent to buy, it is right in acknowledging that many potential owner occupiers struggle to save a sufficient mortgage deposit to purchase a home. Rentplus seeks to bridge this gap by providing families with a home that is rented at an affordable level for a set period to enable savings to be built up, before purchasing the home outright.	Points raised are noted but no changes to agreements 1 or 2 are consider necessary in response, though the housing section will consider implications of the new methodology and emerging government policy towards the definition and delivery of affordable housing.	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	1 KLBID represents the business interests located in a defined area which equates to King's Lynn town centre. It welcomes the opportunity to input to the draft Norfolk Strategic Framework (NSF) and does so from a largely West Norfolk, and especially King's Lynn perspective. 2 We broadly support the vision and objectives set out in the NSF. However we have doubts as to the deliverability of some of them, especially where provision of services lies with the private sector, which cannot be required to work in accordance with the NSF, especially where it compromises their duty to secure best value for their ratepayers. Our concerns in this respect lie mainly in the provision of transportation services and are discussed in answer to question 15. 3 We also have concern that the different economic and demographic links of West Norfolk, having more in common with Peterborough and especially Cambridge, are not properly recognised in the NSF. As a result, we believe that either the Borough Council will have to change planning policy considerably to accord with the vision, objectives and agreements contained in it, or it will be largely a dysfunctional and irrelevant document insofar as this area is concerned. This can be overcome by writing into the NSF a greater recognition of these differences and ensuring that the vision, objectives and agreements are proofed against West Norfolk's differences rather than what appears currently, to largely ignore them.	In drafting the NSF and particularly in describing the functional economic areas there was considerable effort to recognise the strategic importance of the links between areas in the west of the county and parts of Cambridgeshire and Lincolnshire to the rest. Furthermore the framework recognises the economic opportunities offered for the whole county by the economic success of Cambridge and has regard to the GCGP economic strategy whilst inevitably issues maybe able to be drawn out more explicitly it would be better if these specific areas where there is a need to address matters are identified individually.	No change to NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	Comments about Section 2 - Vision and Objectives Section 2 sets out the shared vision and objectives. It states that Norfolk is a diverse County with a diverse economy and focusses on hi-tech industries and the offshore energy sector. As one of the key sector industries in Norfolk tourism and the environment upon which it depends is conspicuous by its absence and should be included. In Section 2.2 the Proposed Spatial Vision sets out a shared vision to guide the Norfolk Planning Authorities in preparing their local plans. Assuming that tourism and the environment are embodied in the term “current assets and networks” the Somerleyton Estate would suggest the following amendment (bold and underlined) to the shared vision: “By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural and built environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life for residents and visitors alike. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel”. In Section 2.3 Proposed Shared Objectives please add the following bullet points under the sub-headings for Agreement 3: “To realise the economic potential of Norfolk and its people by:” •Supporting the County’s tourism offer and the environment upon which it relies. “To reduce Norfolk’s greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change by:” •Supporting and facilitating indigenous tourism development. Also in Section 2.3 under the sub-heading “To improve and conserve Norfolk’s environment” the following bullet point objective is noted as particularly important by the Somerleyton Estate in protecting assets such as the Fritton Lake Resort: •Protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements”.	No specific sectors are addressed in the vision and objectives however it is agreed to enhance the tourism reference in the economic section.	Tourism Reference added in Economic Section

ANON-3C85-CA3V-G	Resident	The objectives of moving travel from car to public transport and of promoting regeneration and renewal of disadvantaged areas would both be consistent with assessing the feasibility of restoring rail services to market towns such as Dereham and Fakenham. Provision for such assessment would be beneficial.	One of the aims of producing the Norfolk Strategic Framework is to agree shared objectives and priorities to improve outcomes and help shape future plans. The introductory text to the document notes that “This document is intended to be strategic in nature. It provides only an overview of background information and shared research.” Section 7 goes on to state “Further work on infrastructure priorities will continue before the finalisation of the NSF but it should be noted that these short term priorities which are listed in this document will only represent a fraction of the overall infrastructure investment needed to deliver the growth ambitions of the NSF” Given this, I am afraid that, whilst the local authorities involved in producing the document might support the aims of the Melton Constable Trust and those of the community rail partnerships, the stage of the project (for orbital rail), the likelihood of it being achievable in the short to medium term, and its role in serving the transport needs of the county (when weighed against the projects within the framework such as Norwich to Cambridge rail) all mean that it is considered premature to consider it of sufficient strategic standing to merit detailing its inclusion in the framework. We are aware that the Trust has been speaking to the various local authorities including Norfolk County Council and are sure that continuation of this dialogue will help to move forward with the project.	No change to NSF
ANON-3C85-CA6C-Z	EA	We welcome the inclusion of the statement in relation to the 'variety of environments valued for their land scape and biodiversity' In terms of the vision, we would like to see a firm commitment to protect and enhance these environments. We would also like to see a commitment to improving water quality in the vision.	Noted and environmental object updated to include water quality	Bullet added : Protecting and enhancing water, air, soil and other natural resource quality where possible.
ANON-3C85-CA61-E	Define Planning & Design Ltd	The proposed spatial vision appropriately recognises the importance of meeting the full housing needs through socially inclusive communities and to ensure a good relationship between homes and jobs. In acknowledging the significance of delivering the anticipated growth within Norfolk, greater emphasis should be placed on the role that all sustainable settlements play within the County, both urban and rural, in achieving these objectives. The expansion of market towns offers great potential for the delivery of sustainable development to meet housing needs and their further growth will strengthen their roles as important service centres for the wider rural hinterland in the long term.¶ ¶ Similarly, whilst it is appropriate to highlight the more significant role of the major urban areas in realising the economic potential of Norfolk and its inhabitants, the significant contribution played by market towns in the County to achieve this objective, such as at Fakenham where strategic growth to the town is already proposed, must not be underestimated and should be highlighted. ¶ ¶ Within the New Anglia Local Enterprise Partnership Economic Strategy, Fakenham is identified as a Growth Corridor, and is anticipated to provide a significant proportion of both housing and employment growth in North Norfolk. This further reinforces the significant role that market towns, such as Fakenham, play towards achieving the shared objectives to improve the alignment between the locations of workplaces and homes.¶ ¶ As such and in order to secure the vision for growth across the County, it is critical that this framework seeks to enable development in locations such as Fakenham through the provision of critical infrastructure, notably highways, drainage and community infrastructure to support future growth.¶	Point noted and authorities will give consideration to this when completing local plans	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	We support the core values and principles set out in Section 2 of the document.¶ We recognise that there is the need for significant structural change to enhance local communities’ quality of life, provide skilled jobs and education, and sustain local ecological processes and economies. These aspirations are shared by the New Anglia Local Enterprise Partnership (LEP), which has an aspiration to create 95,000 jobs and 117,000 more homes in the period up to 2026 for Norfolk and Suffolk, along with the need to preserve our unique landscape quality and focus on food production as a core industry.¶ ¶ We support the growth of existing towns, particularly where there is an economic and social need for expansion to secure future communities and local economies. This is particularly where the negative impacts are either insubstantial or can be consensually mitigated against and where opportunities exist for significant environmental and/or social improvements. Furthermore, reliance on a large number of small and medium sized sites places a question mark over the certainty of delivery and will also cause extreme difficulties in managing housing trajectories. This can mean that a larger number of communities are affected by development. Because of an insignificant quantum of development, infrastructure, community, employment and economic benefits cannot reliably be funded or implemented.¶ ¶ We therefore request that where the Framework sets out a series of bullet points to address housing need, to add the following:¶ ¶ •¶undertaking a strategic review for a suitable planning and social guidelines for creating and locating a new garden town or village community, which will provide a high-quality development meeting established and innovative garden city principles and delivering needed local infrastructure improvements, whilst bettering local communities and enhancing the local environment.’ ¶	Noted the matter of a new town is for local plans to address.	No change to NSF

ANON-3C85-CA3C-W	Resident	In order to achieve the aims of improving public transport, the strategy should consider re-establishment of lost rural rail links.¶ This would ease the burden on the road network and prove to be far ‘greener’.	One of the aims of producing the Norfolk Strategic Framework is to agree shared objectives and priorities to improve outcomes and help shape future plans. The introductory text to the document notes that “This document is intended to be strategic in nature. It provides only an overview of background information and shared research.” Section 7 goes on to state “Further work on infrastructure priorities will continue before the finalisation of the NSF but it should be noted that these short term priorities which are listed in this document will only represent a fraction of the overall infrastructure investment needed to deliver the growth ambitions of the NSF” Given this, I am afraid that, whilst the local authorities involved in producing the document might support the aims of the Melton Constable Trust and those of the community rail partnerships, the stage of the project (for orbital rail), the likelihood of it being achievable in the short to medium term, and its role in serving the transport needs of the county (when weighed against the projects within the framework such as Norwich to Cambridge rail) all mean that it is considered premature to consider it of sufficient strategic standing to merit detailing its inclusion in the framework. We are aware that the Trust has been speaking to the various local authorities including Norfolk County Council and are sure that continuation of this dialogue will help to move forward with the project.	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	NB It is difficult to comment on detailed content in this format and without paragraph numbering.¶ The statement on the economy again misses key areas which are essential to understanding and describing the economy of Norfolk and its economic potential for example world leading agriculture, centre of medical excellence and spin-off, growing rural entrepreneurial economy albeit focussed at present in key coastal areas, cultural digital and creative industries in central Norwich, healthy and growing tourism & leisure proposition.¶ It should be stated that Norwich is the regional retail centre and has the biggest physical catchment of any city in the UK outside London (source: open source Space Syntax modelling, Cities Foresight Group BIS) This leads to intense pressures of accommodating commuting at key but predicatable periods on a daily basis, particularly within the historic urban core.¶ The para on connectivity sounds negative - this should be redrafted in a positive tone setting out the positive connectivities. The emphasis on long distance connections via road and rail is potentially wrong headed. In order to reduce congestion we need to consider a multi modal local transport network including improved links to Cambridge, reinstatement of local rail to service commuter trips into and out of Norwich and to underpin more sustainable tourism to the coastal areas. The county should stop trying to produce a competing economic/locational offer to geographically central locations such as Peterborough and instead focus on the essential Norfolk proposition. The self contained nature of teh Norfolk economy with Norwich at its core produces a model of a self contained city-region with a highly dependent hinterland and relatively high local economic capture. Together with the very high quality of life proposition, this potentially puts Norfolk and Norwich in an excellent s to benefit from the trend in locational dynamics that is increasingly being recognised by Property Research organisations such that the smart money (both residents and businesses) are chasing quality of life. Savills have written extensively on this point as have other market commentators. The present emphasis on road connections in the para and under investment in long distance infrastructure reflects and old economy view of locational dynamics.¶ It sketches an approach to sustainable smart growth but stops short in fully embracing this. A critical omission at para addressing reducing greenhouse gas and resource conservation -¶ contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;¶ the paper should explicitly set out that settlements should be 'smart footprinted' to ensure that land use supports walkability and trip reduction, through colocation, mixed use and careful disposition of uses to support public transport viability and accessibility.¶ ¶delivering high quality, energy efficient homes in attractive (living environments) which make a positive contribution to the health and well-being of communities Insert ' neighbourhoods or communities' in place of 'living environments' - this is not a unit of development that either residents nor developers recognise.¶ ¶dd 'and which underpin Norfolk's place competitiveness' .(ie the county's unique economic proposition).¶(continued below) ¶	Wide ranging response setting out a significant number of points and essentially proposing a different vision to the one that is currently encapsulated within the shared vision and objectives. Whilst this vision described may have some merits to seek to change the vision in the NSF as proposed to one seeking to propose development of a locally distinctive nature with much higher levels of self containment and more self contained economies based on quality of life rather than improving external infrastructure linkages and connectivity to the wider south east is not one that is shared by all partners, so to some extent the current vision and objectives reflect what partners are prepared to agree to, rather than a single compelling vision which may not be agreed by all partner bodies. Therefore it is not favoured to make wholesale changes to the emerging vision and objectives to reflect the particular view put forward and the "smart growth" model. It is recognised that using the term "communities" within the objectives may be preferable to "living environments"	Change "living environments" to "communities in" objective under housing needs
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	(continued from above)Spatial Vision While generally sound, the spatial vision is too generic and doesn't fully reflect the essential qualities of Norfolk. The proposition could attach to almost any county in the UK - we need more recognition of the essential qualities of the asset base, character and culture of Norfolk., and a vision tightly built out of these foundations. SUGGESTION - work should be done with Building Growth, Chamber of Commerce and the CPRE building on the formers outreach into the building industry in partnership with the Chamber of Commerce's Planning Group reaching a volume of businesses, and the latter's community outreach capacity (and their Norfolk 2020 document) to undertake wide stakeholder discussion of the key qualities of Norfolk and an aspiration for good growth for the next 20 years. The Place Land & Markets Group at Building Growth would be pleased to work with the Norfolk Strategic Framework to coordinate and produce this. The specific points set out towards achieving the positive growth of Norfolk are useful. To be made more powerful they need to be placed within the context of a stronger spatial vision and overarching growth narrative. QUESTION - how will the points set out be translated into robust planning policy which will resist development that produces generic single use housing propositions in the face of the present NPPF and 5 year land supply issues? The BG PL&M Group would be pleased to work with the NSF team to consider how these aims can be robustly embedded into the planning and development delivery process to ensure delivery and help fight litigation and challenge. ADDITIONAL INFO SUBMITTED - Place Competitiveness & The Regional Growth Challenge	see above. Timetable for NSF adoption insufficient to allow significant joint working with the building growth group at this stage, however, the offer is welcomed and how to further improve joint working between the local authorities and the LEP sector group could be taken forward in the new year.	No change to NSF

ANON-3C85-CA3K-5	Natural England	2.1 Introduction p6 Second paragraph (under Fig 1), second sentence should be amended to read as follows: "It contains many natural environments which are highly valued for their landscape and for their biodiversity and/or geodiversity interests." Currently there is no reference anywhere in the NSF to Norfolk's rich geological sites and features, many of which are of national importance. Similarly, there is no reference to soils. 2.3 Proposed Shared Objectives p9 The wording of the objectives for Norfolk's environment should be amended to read as follows: "To improve and conserve Norfolk's environment by: - ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast; - protecting the landscape setting of our existing settlements where possible and preventing - the unplanned coalescence of settlements; - maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land; - minimising, where possible, the development of best and most versatile agricultural land; - where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised; - protecting, maintaining and enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development; - providing a coherent connected network of accessible multi-functional green infrastructure; and - reducing the demand for and use of water and other natural resources. The amendments will help to ensure that the objectives of the NSF comply with the National Planning Policy Framework and that the planning system in Norfolk contributes in a sustainable manner to the creation, protection and enhancement of its natural resources.	Changes accepted.	Environmental objective updated
ANON-3C85-CAC4-X	Stalham Town Council	I would like to see a bus service that goes direct from Stalham to Norwich Railway Station, as Stalham has no station of its own. There is a requirement in Stalham for more businesses to move here to encourage younger people to live in the area and stay here. Since the banks closed the footfall in the town has also fallen, so this could be improved by building societies being encouraged to locate in the town and other small businesses. Stalham residents and the outside areas rely heavily on the town, so we would not wish to see it lose any more businesses. I believe Norfolk would benefit from a better road connection between Norfolk and the North West, e.g. Norfolk to Liverpool, Manchester and Birmingham, etc. At present, the journey time to the North West is far too long. I would like to see the NCC give thought about how to provide and support youth clubs and other events for teenagers in rural areas. At present there is no bus service from many rural areas to Norwich in the evenings, so this encourages some teenagers to find less desirable forms of entertainment where they live, such as vandalism, etc. I get the feeling in Norfolk that not enough is done to encourage events that might appeal to them, and providing the transportation for reaching them.	Points noted but unfortunately it is hard to identify how these matters may be addressed through the NSF.	No change to NSF
BHLF-3C85-CAC1-U	Home Builders Federation	Plan periods and reviews Whilst we would agree that it is important for there to be consistency with regard to the plan period it is important that they not only have consistent end dates but also consistent starting dates. Consistent plan periods will improve transparency and ensure that the house building industry has a clear picture of delivery across the County and whether housing needs are being met. However, we also consider it important for the Framework to set out a shared review point for each local plan. The Government have been clear that plans should be reviewed every five years and that such reviews would offer the opportunity to consider greater alignment of plans. Setting this out in the Framework would provide a clear indication that the districts and boroughs in Norfolk were working toward greater co-operation and alignment of their plans in future.	Noted but not practical, local planning authorities are likely to base emerging local plans on most up to date information available rather than a standard start date.	No change to NSF
ANON-3C85-CACS-W	Norfolk Wildlife Trust	Pleased to see importance of biodiversity is recognised in second paragraph Support all bullet points under heading of "improve and conserve Norfolk's Environment"	Support noted	No change to NSF
BHLF-3C85-CAC7-1	Amstel Group Corp	As the Framework notes, Norfolk is a "largely rural county". The Framework asserts that "a good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel." We welcome the Framework's intention to address housing needs by contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services. The Framework recognises that Norfolk is a largely rural county and therefore the Framework should also realise that this means that there will always be an inherent need to travel in order to access certain goods and services. Norfolk's rural villages have better access to goods and services now than ever before, as people procure more and more goods and services online. The Framework and the emerging Local Plans of Norfolk's Local Planning Authorities need to reflect this cultural shift in shopping habits. Thus the need to be physically close to goods and service providers is less important than it used to be and should no longer be the over-riding component of sustainability. New factors such as broadband connectivity and access to higher order services should now form part of the debate. Likewise, the Framework should acknowledge changes in contemporary working patterns. Travel to work patterns are more diffuse nowadays and there is an ever-rising incidence of home/remote working. As such, there is less emphasis on travelling for work. The over-arching spatial document for Norfolk should explicitly acknowledge this. All of this leads to a need to take a more nuanced and sophisticated approach to preparing a spatial strategy for the area and sustainability generally. Proposed settlement hierarchies in emerging Local Plans need to reflect these changing habits.	Views noted at local plans we need to strike the appropriate balance between concentrating growth in and around larger settlements and dispersing it across a wider range of settlements, this is considered to be a matter primarily for local plans but the vision and objectives expressed in the NSF are considered to be consistent with government guidance in this matter.	No change to NSF
BHLF-3C85-CACW-1	Barford & Wrampingham Parish Council	Barford and Wrampingham Parish Council feel that the document lacks strategic clarity. For example it has plenty of high level objectives but sort on measurable outcomes. There is also a lack of information and definitions which make it impossible to make meaningful comment on the planning policies regarding housing allocation calculations for example there is little comment on whether we will see the introduction of further strategic gaps which can be an important issue for service villages as towns creep further out nor is there any statement as to whether the current settlement hierarchy will remain in place. It also seems incongruous that Breckland is not part of this Greater Norwich Local Plan as people live in towns such as Attleborough and Thetford and have similar lengths of journeys to work in Norwich as people in e.g. Diss which falls within SNDC.	Views noted. NSF reflects the current position that Breckland District is preparing a standalone local plan and not participating in the production of the GNLP.	No change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	Section 1 - Timescales and Coverage (Agreement 1) Persimmon Homes supports Agreement 1 for the LPA to produce documents which provide for the development needs of their areas until at least 2036. This is essential to ensure that our investment and planning strategies are informed by up-to-date and forward-looking plans, that provide certainty for a number of years. Persimmon Homes would urge all Local Authorities across Norfolk to push forward quickly with their Plan reviews to provide the certainty the house building industry needs. Section 2 - Vision and Objectives (Agreements 2 and 3) Persimmon Homes supports the Proposed Spatial Vision (Agreement 2) and Proposed Spatial Objectives (Agreement 3). It is in everyone's interest for Norfolk to have a strong and vibrant economy; supported by key infrastructure which includes housing; improved connectivity and appropriate relationships between the location of new homes and jobs. Persimmon Homes also support co-operation across District Council areas. Housing markets do not follow administrative boundaries, and Districts need to collectively plan for housing to meet the housing needs not just for their District but also neighbouring Districts and in some cases adjacent Counties. Persimmon Homes notes the objective to match increases in job growth with housing growth but it should not be forgotten that there is still some catching up to do in terms of housing delivery. Persimmon Homes are doing what they can to deliver homes where they are needed, but there are opportunities for the planning system to be more efficient in providing the necessary consents and agreements to allow developers to get on site and build, such as improvements to Local Plan and planning application processing; reserved matters applications, 8106 completions, Discharge of Condition applications etc	Noted	No change to NSF

BHLF-3C85-CACQ-U	Historic England	We welcome the acknowledgment in section 2.1 of the considerable stock of heritage assets which make up the area’s market towns and, the recognition of the role these assets play in creating attractive high quality places for residents to live which can also improve well-being. It would be pertinent to also reference the strong rural heritage of the area as well in terms of both the built and natural environment as well as archaeology. A strategic level reference to the importance of non-designated or undiscovered heritage assets would also be welcomed. Proposed Spatial Vision The vision seeks enhancements to both the natural and built environment; the distinction between the two and specific reference to the built environment is welcomed but we request that the “historic environment” is listed as well. We would recommend that the Vision make specific reference to designated and non-designated heritage assets or the historic environment. Proposed Shared Objectives We are pleased to see that the protection and enhancement of Norfolk’s built and historic environment and landscapes constitute a shared objective (page 9 of the draft). We request that this remains a shared objective.	Support noted, current wording refers the historic environment which is a broad term encompassing archaeology and non designated environmental assets. Including further specificity on this matter would lengthen objectives and merely duplicate NPPF. However agree to change spatial vision to include 'natural, built and historic environment'.	Change spatial vision to include 'natural, built and historic environment'.
BHLF-3C85-CAC5-Y	Norfolk County Council	We welcome the environment thread throughout the document as the environment is pivotal in ensuring resilience to climate change, quality of life, health, economic viability etc. Under Agreement 3 (To address housing needs in Norfolk) – suggest another bullet along the lines: “Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (i.e. through S106 agreements and/or Community Infrastructure Levy)” There should be a cross-reference to this point in Section 7 (Infrastructure and Environment) on page 40.	Support noted and NSF updated	Include bullet: “Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (i.e. through S106 agreements and/or Community Infrastructure Levy)”
BHLF-3C85-CAE4-Z	North Norfolk District Council	Agreement 1-3: That the Council supports better alignment of Local Plan production. That no objection is raised to the shared vision and overarching objectives although further consideration could be given to making these more specific to Norfolk. In this regard some reference to important strategic considerations such as the process of coastal change, the AONB and the importance of market towns in rural areas may be useful.	This will be considered in future versions of the NSF	No change to NSF

UNDERSTANDING THE COUNTY COMMENTS

Response ID	Organisation	Answer	Officer Response	Action
ANON-3C85-CA8T-K	Hockering Parish Council	All new developments need to be considered with extreme sensitivity to the existing area, its residents and rural nature. New roads are not necessarily the answer. An improved public transport system should be encouraged.	Noted	No change to NSF
ANON-3C85-CAFT-1	Resident	3.3 seems to neglect the cultural / attitude changes needed to remove the silo working of districts (both as political institutions and as residents). Agreements 5 and 6 seem to indicate that this silo planning will continue.⌘	All authorities are working closer together on strategic issues and will continue to do so in the future	No change to NSF
ANON-3C85-CAXS-J	Resident	Cromer and Sheringham, plus the closer to Norwich Aylsham, are shown as travel to work areas. Substantial housing developments are taking place in Aylsham and yet there is still only one single carriageway road in to Norwich from Cromer via Aylsham and very limited public transport from Aylsham i.e. no train, so inevitably a substantially increased volume of road traffic to Norwich. There is no indication that Highways have any proposals to mitigate this.	Noted	No change to NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	Parish councillors are elected representatives of the Parish and yet we have very little input to the Broads Authority and never see the authority members	Noted	No change to NSF
ANON-3C85-CAXW-P	NUA	•⌘UA note the aim to reduce car use in the county in favour of public transport. We hope that in the delivery of this aim will be reflected in provision of adequate parking for those travelling from parts of the county which are unlikely ever to be served well by public transport options. We would also be keen to see this aim reflected in improved signage for motorists, cyclists and pedestrians	Noted	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited understands the reasons for the various Agreements and supports the certainty provided by Agreement 6 (ie Breckland to prepare its own local plan). Attleborough Land Ltd also accept that housing market areas are not restricted to administrative boundaries. Attleborough Land Ltd have submitted a planning application that is consistent and in conformity with both the Existing Core Strategy and emerging Local Plan. The application will provide for a significant proportion of the housing market area's identified housing need. The information in the existing and emerging local plan and their supporting documentation has helped to inform the planning application's evolution and also the masterplan and parameter plans.	Support Noted	No change to NSF
ANON-3C85-CAJG-R	Resident	The document clearly does not identify the county in terms of not recognising the needs of full time residents in North Norfolk, including Fakenham, who have very limited access to good roads, broadband, swimming pool and rail services. The area just had to suffer increased tourism and second home ownership. The document fails to recognise the likely impact on the current NDR development and the lack of any decent roads north of Swaffham, Norwich and Dereham.	Noted	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 3.2 The housing market areas are really interesting. The use of the word 'snapped'⌘ is unclear. ⌘ Para 3.3 - The differences between figs 3 and 4 are fascinating with West Norfolk extending much further eastwards in Fig 4. with Thetford and Mildenhall as well as Cromer and Sheringham becoming distinct areas.⌘ The poor east west connectivity in the county is a major problem. The Northern Distributor Road will be of help particularly if extended to connect with the A47 to produce an orbital road around the city.	Snapped refers to following district boundaries as a near fit. Other points noted.	No change to NSF
ANON-3C85-CA62-F	Resident	Too much emphasis on road building.⌘ ⌘	Concern noted	No change to NSF
ANON-3C85-CAJF-Q	Resident	The analysis is broadly supportable, but the lack of presumptive travel to work in Cambridge (although Mildenhall is included) is highly doubtful and questionable as there is considerable travel to work there from King's Lynn and Downham Market. Indeed, from the latter there is also considerable travel to work in London as well.⌘ ⌘ This omission means that the analysis is flawed in respect of West Norfolk, so the statements that "self containment in housing and economic matters [will remain] as present" and "the functional geography of the County will remain broadly as it is..." is plainly incorrect.⌘ ⌘ It is notable that rail developments to be implemented by Abelio during its new franchise period are included, implied to be laudable, but the downgrading of train service delivery by Great Northern between King's Lynn, Cambridge and London from 2018 is deemed not to warrant a mention. This reinforces the flawed analysis referred to above; if travel to work in Cambridge and London from West Norfolk is recognised then the planned worsening of the train link from West Norfolk, and the possible transfer to car travel this may bring, would be flagged as a cause for grave concern.⌘	Figure 4 reflects ONS statistics for Travel to work Areas. Points regarding counties economic geography are not agreed with, numbers commuting out of the county for work are considered likely to remain low as a proportion of total resident workforce.	No change to NSF

BHLF-3C85-CA3P-A	Heaton Planning Limited on behalf of Brett Aggregates	Agreement 3 -Proposed shared objectives Agreement 3 seeks to ensure that by 2036, through cooperation between Local Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of a number of objectives. The document provides the general strategic principles/objectives for all Local Plans. In addition the document is endorsed by the County Council, which would indicate that the emerging Minerals Local Plan will also be based upon the same objectives. In this regard, it is considered that shared objectives for Norfolk should include: • The safeguarding of known mineral resource from needless sterilisation • The sustainable use of natural resources • Planning for a steady and adequate supply of aggregates to meet the projected development needs of the County Section 3 – Understanding the County Paragraph 3.1 – Administrative Boundaries Section 3.1 identifies that, ‘as County wide plans are already in place for minerals and waste this framework does not address mineral and waste matters further although further iterations of these documents will need to reflect our shared ambitions for growth’. We consider that this matter cannot be disjointed from Local Planning Policy as the Minerals and Waste Development Plan combined with the Local Plan become the Statutory Development Plan for the area. The County Council has committed to a ‘Minerals Plan Review’ to consolidate all current adopted Development Plan Documents as well as extending the Plan timescale to 2036. In light of this commitment to review the Minerals Plan and the coinciding timeframe for Plan periods, it is considered that it would be prudent to include reference to minerals and waste needs for the County within the Strategic Framework. We have suggested inclusion of reference to minerals provision within the spatial vision and shared objectives as above.	The Norfolk Strategic Framework is a non-statutory document which considers planning issues at a County scale that are currently planned for on a smaller scale (district, borough or Greater Norwich). As minerals and waste are already planned for at a County scale in a statutory plan, it is not considered necessary for this work to be replicated in the NSF.	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	1 This links to the answer in question 5 that insufficient understanding or regard towards West Norfolk's differences from the rest of the county is evident. It works within a different economic sphere of influence (largely linked to Cambridge, not Norwich), and is a sub-regional centre in its own right. Neither of these, nor the importance of them, are given due recognition in the NSF. 2 This failure is most evident in the lack of recognition of the considerable infrastructure investments required in this area, to broadband provision, to rail and road networks. This is discussed further in answer to question 15. 3 We note the statements that "self-containment in housing and economic matters [will remain] as present" and "the functional geography of the County will remain broadly as it is" and whilst these may be broadly correct for much of the county, they are manifestly not so in the West. This incorrect assumption leads to interventions and investment proposals that are inadequate to ensure a vibrant economic future in the West and needs to be corrected.	It is felt that the NSF does recognise the strategic importance of the links between areas in the west of the county and parts of Cambridgeshire. The Infrastructure section highlights a number of key road and rail improvements in the west of the region. Regarding point 3, from our understanding of evidence it is likely that for the foreseeable future employment patterns around King's Lynn will remain sufficiently self-contained such that the ONS will continue to identify the area as a separate travel to work area and not part of the wider Cambridge TTWA.	No change to NSF
ANON-3C85-CA3V-G	Resident	Agreement 5 is absolutely right. No time to re-invent the wheel.	Support Noted	No change to NSF
ANON-3C85-CA6C-Z	EA	as per our previous comment we would like to see water quality included in the section related to the environment. Future development should not impact on water quality and the water framework directive and water cycle studies should be used to improve water quality. We welcome the objective to incorporate environmental benefits into development, which will contribute to green infrastructure. We also support the vision to reduce the demand and use of water, this should relate to both construction and habitation of new development	Point noted, water quality aspects are dealt with under the infrastructure section and a reference to water quality has been added to the objectives.	No change to NSF
ANON-3C85-CA61-E	Define Planning & Design Ltd	Whilst we do not object to the principle of HMA boundaries being ‘snapped’ to Authority boundaries for the sake of ensuring common boundaries between the three HMAs, the potential impact on housing targets as a result of functional economic market areas that clearly cross between the HMAs must be carefully considered in conjunction with the SHMA preparation process. In this regard, the travel to work areas identified in Figure 4 illustrate the considerable overlapping of economic functions across the HMA boundaries. Notably, Fakenham and Kings Lynn fall within the same TTWA, but within separate HMAs, and it places Fakenham and Wells within separate TTWAs, which does not necessarily reflect the proposed Growth Corridor between these two settlements. Given the overarching emphasis within this framework on the relationship between housing and employment growth and the need for this to be directly linked, it is critical that the economic function between settlements is acknowledged and fully taken into account. In terms of the challenges on infrastructure, it is noted that the proposed enhancements are not considered likely to result in a change in the functional geography of the County. However, localised improvements must be considered a priority through the Local Plan process if the growth potential of settlements beyond the major urban areas is to be maximised, in order to meet identified needs where they arise as part of a sustainable growth strategy. As noted in further detail in response to Section 6, the critical role of other bodies in the planning, funding and delivery of infrastructure should also be explicitly referred to in order to encourage their proactive involvement.	Point noted but are best considered in the preparation of local plans	No change to NSF

BHLF-3C85-CA3W-H	Hoveton Parish Council	Section 3 – Understanding The County ¶ Hoveton Parish Council was pleased to see the following had been noted as part of the draft Norfolk Strategic Framework: ¶ ¶ “Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development.” ¶ As noted above, the parish of Hoveton is administered by two Local Planning Authorities. ¶Meanwhile, an additional challenge is posed by the fact that the parish of Wroxham – which shares strong functional relations with Hoveton, along with a shared infrastructure – is administered by a neighbouring Planning Authority (in this case, Broadland District Council). ¶The neighbouring parishes are also represented by two different Members of Parliament from ¶two different political parties, and policing is overseen by two separate Safer Neighbourhood Teams. In an attempt to speak with "one voice" and to encourage Local Authorities to work ¶more closely together, Hoveton Parish Council and Wroxham Parish Council recently formed ¶the Wroxham and Hoveton Joint Action Group, which aims to tackle issues that affect both ¶parishes. ¶ ¶ Hoveton Parish Council is pleased to see that North Norfolk District Council will continue to ¶produce a separate Local Plan for the area and that, in view of the distinct issues facing the ¶Broads Authority area, spatial planning matters will be addressed by way of a standalone ¶Broads Local Plan.	Noted	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	In addition to the information set out previously, we are of the view that further joint working between the relevant authorities is essential for the viable future of Norfolk.¶ ¶ The document advocates groups of authorities to conjoin Local Plans. There is of course the duty to co-operate, but in our view that the excellent initiative of creating this Framework, led by the County Council should be further developed. This should continue to look at the most sustainable strategic development strategy for the entire County regardless of politics and Local Planning Authority boundaries.¶ ¶ This we believe is justified by the lower density of development and occupation compared to most other parts of the country, allied to the significant issues of shortfalls in infrastructure, particularly in public transport and the need to take a strategic approach through carefully planned development, which will help support the improvements needed.¶ ¶ The focus on existing key employment sectors and economic centres, particularly Norwich, but also towns such as Thetford, Kings Lynn and Great Yarmouth is of great importance while the proposals for improving the travel to work in such locales areas is particularly of interest. This however should not be to the detriment of existing rural areas where there are existing and nascent communities ready to become involved in this strategic process.¶ ¶ We are also of the view that as part of this strategy, an innovative approach needs to be taken with respect to transport planning, building on the recommendations included in the Norfolk County Transport Plan. This recognises the economic and social values of Bittern and Wherry Lines, commits to promote these lines, and to work with other Community Rail Partnerships, an example of which is the North Norfolk Orbital Railway project. This Plan also highlights the importance of the North Norfolk, Mid Norfolk and Bure Valley Railways and indicates that the County Council will support improvements sought by the independent rail groups responsible for them. However, the Connecting Norfolk document indicates that despite highlighting continued official support, it does emphasise that funding is limited and none of the major funded capital improvements will be linked to this type of opportunity. Section 106 and CIL monies, despite being given a fair wind in the Plan, may be not provide sufficient resources to lead to any of the needed infrastructure improvements.¶ Continued below ¶	Points noted, it should be noted that preparation of the NSF has been lead by districts working on a county wide basis rather than by the county council. Whilst there are plans to further develop joint working there are no plans for a county wide strategic plan at present. One of the aims of producing the Norfolk Strategic Framework is to agree shared objectives and priorities to improve outcomes and help shape future plans. The introductory text to the document notes that “This document is intended to be strategic in nature. It provides only an overview of background information and shared research.” Section 7 goes on to state “Further work on infrastructure priorities will continue before the finalisation of the NSF but it should be noted that these short term priorities which are listed in this document will only represent a fraction of the overall infrastructure investment needed to deliver the growth ambitions of the NSF” Given this, I am afraid that, whilst the local authorities involved in producing the document might support the aims of the Melton Constable Trust and those of the community rail partnerships, the stage of the project (for orbital rail), the likelihood of it being achievable in the short to medium term, and its role in serving the transport needs of the county (when weighed against the projects within the framework such as Norwich to Cambridge rail) all mean that it is considered premature to consider it of sufficient strategic standing to merit detailing its inclusion in the framework. We are aware that the Trust has been speaking to the various local authorities including Norfolk County Council and are sure that continuation of this dialogue will help to move forward with the project.	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	(continued from above) These live and dormant rail lines present a range of opportunities, from continuing to develop an interesting tourist experience to linking towns, improving connectivity and the sustainability of anticipated transport movements. But these rail lines also provide strategic planning opportunities, and help to meet growth requirements in a planned and sustainable manner, by creating new centres of planned development, which may include consideration of one or more planned garden communities. Such settlements would make a significant contribution to the infrastructure investment needed, link to sustainable travel opportunities, particularly through rail, but also ensure a managed approach to growth in the medium and longer terms. We therefore recommend that recognition of the potential of a County-wide joint approach and innovative transport planning including a focus on disused or underused former rail lines, should be made in the Framework. These live and dormant rail lines present a range of opportunities, from continuing to develop an interesting tourist experience to linking towns, improving connectivity and the sustainability of anticipated transport movements. But these rail lines also provide strategic planning opportunities, and help to meet growth requirements in a planned and sustainable manner, by creating new centres of planned development, which may include consideration of one or more planned garden communities. Such settlements would make a significant contribution to the infrastructure investment needed, link to sustainable travel opportunities, particularly through rail, but also ensure a managed approach to growth in the medium and longer terms.	See above	No change to NSF

ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	Housing Market Assessment There is a gaping omission in the current document to refer to the impacts of 1) the Cambridge growth phenomenon on the current and potential property market and servicing requirements to be considered in the plan period; 2) to the albeit limited, however profound local impacts of second home ownership and the increasing deployment of domestic property for rental income in the Coastal areas 3) the relationship of the county to the London property market - while we see relatively limited daily commuting, weekly commuting to London is a common phenomenon, equally we are seeing substantial reverse migration from London due to property price and poor quality of life. These key housing market dynamics need to be acknowledged and understood in planning for future growth. Agreed that the functional geography of the county will not be impacted by the Norwich in 90 investment. We propose that a critical focus of future investment should be the speed and frequency of Norwich-Cambridge line which could substantially alter the functional geography. Equally, consideration should be given to the reinstatement of local rail lines serving movement into and out of the City of Norwich and leisure movement to the coastal area. Both such infrastructure moves would substantially alter the locational characteristics of the County. They would also underpin a more equitable access to jobs, education and services for the very young and very old, and would underpin a sustainable land release pattern and sustainable tourism as it grows into the future. The definition of submarkets has missed out a critical step in terms of assessing alternative growth models and modelling the underlying infrastructure to identify cost benefit and capacity. The BG PL&M group continue to advocate a new approach to regional planning based on the intelligent spatial analysis drawing upon the latest analytical technology and deep data sources which are now available to us. This position is covered in the previously attached document entitled 'Place Competitiveness' and we would like to explore the potential for working with the NDF to develop such a model potentially located at UEA for all relevant authorities and the private sector to draw upon.	Noted, many matters referred to have been considered in the production of SHMAs that inform this framework.	No change to NSF
ANON-3C85-CA31-B	Wroxham Parish Council	Wroxham Parish Council supports the view contained in the draft document: “Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development.” As noted above, the parish of Wroxham is administered by two Local Planning Authorities. Meanwhile, an additional challenge is posed by the fact that the parish of Hoveton – which shares strong functional relations with Wroxham, along with a shared infrastructure – is administered by a neighbouring Planning Authority (in this case, North Norfolk District Council). The neighbouring parishes are also represented by two different Members of Parliament from two different political parties, and policing is overseen by two separate Safer Neighbourhood Teams. In an attempt to speak with "one voice" and to encourage Local Authorities to work more closely together, Wroxham Parish Council and Hoveton Parish Council recently formed the Wroxham and Hoveton Joint Action Group, which aims to tackle issues that affect both parishes.	Noted	No change to NSF
ANON-3C85-CA35-F	Tunstead & Sco Ruston Parish Council	My view is that the Broads Authority should not be given any powers regarding planning. Their duties as public servants is to promote boating and the holiday industry on the Broads, maintain clear navigation by dredging channels and clearing weeds from these channels, and to protect the environment.	Not a matter to be addressed by the NSF	No change to NSF
BHLF-3C85-CAC8-2	Suffolk County Council	3.2 Housing Markets The Suffolk local authorities (Suffolk LAs) agree with the pragmatic approach to defining housing market areas used in the Framework and seeking to fit these to administrative boundaries. Specifically Waveney District Council has written in support of the coterminosity of the housing market with district boundaries. In addition the approach of identifying housing market areas at larger than individual districts is consistent with that used in Suffolk. However it is recognised that this cannot be a firm line and that influences do extend across such boundaries.	Support Noted	No change to NSF
BHLF-3C85-CACG-H	Persimmon homes	Section 3 - Understanding the County (Agreements 4-7) Persimmon Homes supports the ambition for the SHMAs to be up to date (Agreement 4)~ However, we do not necessarily agree that the Housing market Areas for Great Yarmouth and West Norfolk do not overlap with the Central Norfolk HMA, at least not as neatly as is suggested along administrative boundaries. If it is not possible to produce a single SHMAs for Norfolk, then we would urge that they are prepared/updated in parallel and LPA's share relevant information. Persimmon Homes note the aspiration for Great Yarmouth and King's Lynn and West Norfolk, Breckland and North Norfolk to produce their own separate plans (Agreements 5-6), but would urge that rolling forward these plans to 2036 is progressed without delay. Plans need to be adopted quickly to provide the certainty that the development industry needs Persimmon Homes support the Agreement for Broadland, South Norfolk and Norwich City to continue to prepare a Joint Local Plan, but are concerned in the slippage of the timetable. Persimmon Homes trust that the authorities will be able to resolve some of the apparent differences in approach to the Joint Local Plan's emerging Spatial Strategy. Persimmon Homes have no comment on the Broads Authority Local Plan (Agreement 7).	Noted	No change to NSF

BHLF-3C85-CACZ-4	Broadland District Council	The comment re Highways agency refers to NSF page 15, 2nd paragraph, where it states: “are scheduled to be completed by 2020”. They will not be done by 2020 (though I don’t know what the timetable is).	Document updated to a number of improvement schemes for the A47 as part of the government’s trunk road programme from 2015 to 2020, although it is likely that delivery of these schemes will not start until 2020	Update section 3.4 to a number of improvement schemes for the A47 as part of the government’s trunk road programme from 2015 to 2020, although it is likely that delivery of these schemes will not start until 2020
BHLF-3C85-CACK-N	Hoveton Parish Council	Hoveton Parish Council was pleased to see the following had been noted as part of the draft Norfolk Strategic Framework:☐ “Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development.” As noted above, the parish of Hoveton is administered by two Local Planning Authorities. Meanwhile, an additional challenge is posed by the fact that the parish of Wroxham – which shares strong functional relations with Hoveton, along with a shared infrastructure – is administered by a neighbouring Planning Authority (in this case, Broadland District Council). The neighbouring parishes are also represented by two different Members of Parliament from two different political parties, and policing is overseen by two separate Safer Neighbourhood Teams. In an attempt to speak with "one voice" and to encourage Local Authorities to work more closely together, Hoveton Parish Council and Wroxham Parish Council recently formed the Wroxham and Hoveton Joint Action Group, which aims to tackle issues that affect both parishes.☐ Hoveton Parish Council is pleased to see that North Norfolk District Council will continue to produce a separate Local Plan for the area and that, in view of the distinct issues facing the Broads Authority area, spatial planning matters will be addressed by way of a standalone Broads Local Plan.	Support Noted	No change to NSF
BHLF-3C85-CAE4-Z	North Norfolk District Council	Agreement 4: That North Norfolk welcomes the on-going commitment to the joint preparation of such studies. Agreement 5-7: That North Norfolk supports these Agreements	Support Noted	No change to NSF

PROJECTIONS OF GROWTH COMMENTS

Response ID	Organisation	Answer	Officer comment	Action
ANON-3C85-CA87-P	Town Councillor/resident	Fails to take account of the effect of Brexit and a such completely unreliable	It is not possible at this stage to predicted the impacts of Brexit on the population numbers and the labour market. Once this picture becomes clearer the NSF can be updated accordingly.	No change to NSF
ANON-3C85-CA8T-K	Hockering Parish Council	It would be helpful to have more detail regarding how these figures have been arrived at. As they stand, they appear purely abitrary,	The comment doesn't specify which figures but the data within this section has been obtain from the Office of National Statistics. Links are provided within the NSF to where the primary data can be obtained and more information is provided on the ONS website.	No change to NSF
ANON-3C85-CAFT-1	Resident	You consider employment, but not the quality of employment. It's disappointing not to see an income deprivation calculation alongside the number of people simply in work.	Section 4 deals with projections of the future. We are not aware of any available future projection of income deprivation	No change to NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	When will the infrastructure be provided	Delivery dates are indicated where known.	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited notes Norfolk's population growth projections. The Sustainable Urban Extension at Attleborough will provide new homes to help accommodate this growth. More detailed information on house types and tenures will follow at the reserved matters stage, which will respond to specific housing needs where possible and viable. This will be achieved through a comprehensive mix of housing types, sizes and tenures. These will be implemented at each phase of the SUE.¶ The Section 106 agreement that will accompany the planning consent will set out the means by which the development's impact will be mitigated including provisions for the infrastructure needed to support population and household growth related to the development. ¶	Noted	No change to NSF
BHLF-3C85-CAJD-N	Resident	Page 19 – The last sentence of 4.1 states that “significant issues” are not considered further in the framework. Why is this? Firstly, surely they should be if they are significant! And secondly transport should be added to social care and education. Transport is very important given that North Norfolk has the third highest proportion of over 65s in the country, a fact not mentioned in the framework; the growing proportion of that age group is mentioned but not the proportion in relation to the country’s average.	Points noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future.	No change to NSF
ANON-3C85-CAJG-R	Resident	The increasing number of over 65s need to be recognised and planned for in North Norfolk, including good roads, rail and public services to support their needs. Consideration must be given to those with increasingly limited retirement income and the isolation in villages which have mainly second homes during the winter.	Points noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future.	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 4.1 - the marked increases in the elderly in all areas except Norwich is associated with decreases in the population of working age. This shift in the age structure may be an important factor in the expected 75% of growth to occur in the Greater Norwich area. The elderly population however will require help with household repairs, cleaning gardening even if remaining in their own homes. The people providing such services will need accommodation preferably in the vicinity that they will be working in.	Points noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future.	No change to NSF
ANON-3C85-CA62-F	Resident	Population growth estimates are unsustainable, particularly in the Norwich area. Such an increase in population is completely at odds with a decent quality of life, especially as large and badly designed housing estates are being built on the outskirts of Norwich, depriving city residents of access to countryside (especially for the third of residents with no access to a car).	View noted	No change to NSF
ANON-3C85-CAJF-Q	Resident	1 The population and household trends show significant impacts not only for social policy (as recognised in the narrative) but also for local transport policies. Based on policy neutral assumptions, over 66s have access free to local bus services and this is shown to produce a net benefit to society of about 3.7:1 on government expenditure. ¶ 2 The dilemma is that local bus services are provided commercially in a free market, and without interventions by local authorities - which take considerable periods of time to arrange - then the current cycle of decline of bus routes will leave a growingly elderly population isolated with the social impacts that that leads to.¶ 3 Part of this policy framework should therefore consider what interventions should be made under the various transport legislation in the 1985, 2000, 2008 or 2017 Acts to ensure that the increasingly elderly population is well catered for in this respect.¶	Points noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future.	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	1 The projections indicate that the over 65 aged population will increase whilst those in the lower ranges will remain largely unchanged. However, in West Norfolk the projections are more skewed with a larger retired population being provided for by a shrinking work age population. ¶ 2 This has very significant implications for the delivery of services for the population as a whole and for the elderly in particular which the NSF does not address. Whilst this is a potentially pan-Norfolk issue it is most evident in projections for the West. The NSF must address how this will be dealt with and adequate provision made. ¶ 3 The impact of a shortage of appropriate aged labour has implications in social care, agriculture and also in retail where, in King's Lynn town centre in particular, greater emphasis is being put on the heritage offer, which requires staff for the hospitality sector, which is traditionally younger adults. How this will be addressed (including housing, training etc) must be addressed in the NSF with a particular West Norfolk aspect to it.¶ 4 A disproportionately ageing West Norfolk population will increasingly require appropriate transport solutions if it is not to become socially isolated. Not only does social isolation have impacts in terms of health and wellbeing but also reductions in local transportation provision will also impact the town centre economy with broader economic consequences for the entire population. The NSF needs to address how it will ensure an adequate local transportation network is maintained and what interventions it will make in the free market, in accordance with Acts of 1985, 2000, 2008 and now 2017 all designed to enable the free market for local bus services to be moderated in order to better meet the needs of the local population.¶ ¶	Noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future. Disagree that it is an issue which is more significant in west Norfolk than other parts of Norfolk eg North Norfolk.	No change to NSF

BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	Section 4 Growth Projections Section 4.1: In Table 2 the projected 2036 percentage change in population growth by age quantiles appears to be incorrect for Kings Lynn and West Norfolk (the figures sum to 156%). Table 3: The breakdown of both the absolute and % figures also seem to be incorrect for Kings Lynn and West Norfolk (showing difference between 'All People' by district between 2014 and 2036). Table 4.2: The growth projections mask important variations – particularly on the Norfolk Coast (and possibly elsewhere unknown to us) where resident population is declining in places. We feel this is a strategic issue. It is important to understand the trend, the underlying reasons and the implications for local communities both now and over the next 20 years. Section 5: The analysis would be more informative if it showed the spatial pattern of jobs and compared these to the spatial pattern of skills in the resident population and the transport links between them. This would help with the development of local policy / strategy.	We cannot identify an issue with the figures indicated and they appear to be correct. Other points noted	No change to NSF
ANON-3C85-CA6Q-E	Resident	Read for information only. Though interesting to note that assurances that housing developments must not place too much burden of the increase in housing on any one area.	Noted	No change to NSF
ANON-3C85-CA6C-Z	EA	We welcome the recognition of the fact that the impacts of development do not follow LA boundaries. We would encourage catchment thinking by neighbouring authorities to be considered, especially when considering the impacts of future development on surface water resources and water quality of the counties river network.	Noted	No change to NSF
ANON-3C85-CA61-E	Define Planning & Design Ltd	The ONS figures provide clear evidence of consistent growth within North Norfolk in recent years and this is expected to continue through the framework period to 2036. It is noted, however, that the employment projection for the District set out within Table 5 is significantly lower than that proposed within the North Norfolk District Core Strategy (September 2008 - Policy SS5) for the earlier period 2001-2021, despite the expectation for continued housing growth to 2036. Fakenham provides a significant opportunity for housing and employment growth, confirmed through the allocation of a strategic extension to the north of the town (NNDC Site Allocations Development Plan Document, February 2011 - Policy F01), part of which is currently being brought forward for development through the planning process. This is anticipated to deliver up to 950 dwellings, mixed use employment, associated community and social infrastructure, plus transport infrastructure improvements, and offers the potential for further development within the remainder of the allocated site. The site is included in Part 1 Assessment of Housing Land within the Housing and Economic Land Availability Assessment, June 2017 (HELAA Site Ref. H0054). Allocation of additional land to the north east of Fakenham (Site Allocations DPD – Policy F07) provides further potential for residential and/or employment development and has also been included in Part 1 of the 2017 HELAA (Site Ref. H0058). Given the availability and suitability of land to support the strategic growth in housing and employment development in this important market town, Fakenham will play an increasingly significant role in the future growth of the District and County.	Noted, this is a matter primary for North Norfolk district council to address in their local plan	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	We support the recognition in this section that there are a number of special circumstances that need to be considered when planning for growth. In particular, the needs of older people, which must not be considered in isolation, have to be carefully planned for, to ensure that they can be accommodated as part of new and existing communities, and also to ensure that services and facilities are provided in a cohesive and accessible manner. Designed holistically and based on sustainability motifs, these new garden settlements may lead to an enhanced housing requirement beyond the household projection numbers because they offer scope of all round environmental social and economic betterment on a fair and decent basis. We argue here that the next phase of housing in Norfolk may well expand if the conditions of design and delivery meet the aspirations of the coming generations. We suggest that this perspective should be more carefully examined. The employment information displays that there is slow growth projected for all of the County, with the exception of Norwich and to a lesser extent in South Norfolk. This prospect appears to support a need for a comprehensive economic strategy across the entire County both urban and rural. This is a framing which the Local Enterprise Partnership is clearly seeking to promote and which is explored in the following section. In our view, this exercise should be regarded as part of a comprehensive approach to understand the potential of a 'ripple' effect from the Norwich City centre and how this may generate wider investment. This perspective could be linked by a programme of new garden settlement planning, which would include wider transport improvements and which would enhance the connectivity and economic potential of other locations. In turn, this could support a range of social activities, including meeting the needs of older and younger people, who would also have access to improved non-car modes of transport, should effective use of our rural rail lines be secured.	Noted	No change to NSF

ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	In order to plan for growth on an informed basis, the projections of growth need to be accompanied by analysis of what aspects of place or location attract jobs and business investment; a gap analysis to consider where Norfolk needs to improve and a granular and segmented consideration of how the growth demographic is composed so that teh best property response can emerge.¶ ¶ So, for example, the County's very low lying performance in educational league tables should not just be seen as an educational issue, but also a locational issue given that it is common knowledge that access to high quality education is a key driver of households and businesses.¶ ¶ The age demographic of in-movers to the county should be closely examined to consider impacts down-the-line on adult social care budgets particularly if these in-movers are accommodated in remote and under serviced locations which will lead in future to high levels of servicing costs to provide services and medical access.¶ ¶ We would therefore argue in favour of more geographically specific housing market analysis; and more granular housing demand /need analysis to fully gain a picture of teh nature of housing that needs to be built in future and the optimal location for tis to be developed.¶	In practice the methodology used in SHMAs is closely prescribe by government with little scope for proposing local variations as suggested.	No change to NSF
ANON-3C85-CAC4-X	Stalham Town Council	As previously mentioned in Section 1, I would like to see an increase in small businesses establishing themselves in North Norfolk, and particularly in Stalham.	The New Anglia LEP Economic Strategy along with other local strategies support small business start ups across the whole of Norfolk	No change to NSF
BHLF-3C85-CACM-Q	Savills	We note that the population statistics in Section 4 are provided for information only and are subject to change.	Noted	No change to NSF
BHLF-3C85-CACG-H	Persimmon homes	Section 4 - Projections of Growth¶ ¶ Persimmon Homes notes the various population, household and employment projections¶ Judgement/comment on these figures is reserved until the standard methodology for assessing¶ housing needs has been applied and results published.¶	Noted	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	Population tables. – The paragraph on the top of page 19 doesn’t appear to tally with the figures in tables 2 and 3 e.g. 15-64 3% growth in para whereas 20-64 in table 3 shows -5.6% ; & 0-16 in para shows8.6% growth whereas table 3 shows -0.9% (0-19). While they are¶looking at slightly different cohorts there are quite big differences so¶should be checked	Figures have been updated to be clearer	Updated figures to be clearer as age ranges in text do not match tables

ECONOMY COMMENTS:

Response ID	Organisation	Answer	Officer Response	Action
ANON-3C85-CA87-P	Resident	Fails to take account of the effect of Brexit as cheap labour will no longer be available , and it be argued no labour at all will be abvailable	It is not possible at this stage to predicted the impacts of Brexit on the Economy and the labour market. Once this picture becomes clearer the NSF can be updated accordingly.	No change to NSF at this stage
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	Tourism is a mainstream and highly valuable (circa £500m and rising fast year on year) industry essential to the well being of the North Norfolk (NN) economy; it provides employment for over 10,000 people and many live outside NN. The coastline, rivers, Broads, rural tranquility, wildlife diversity, historic assets and scenic big sky views are the main reasons why so many people come to visit and spend so much of their leisure time in NN. We know there are capacity issues which is why we need to convert more visits to staycations and increase the spend per head rather than just increasing visit volume; that relies on maintaining and improving the quality of the experience. Strategically, we have to plan to protect and preserve all of these generic attractions if we aren't to destroy the special appeal that draws people to NN. While the Framework mentions Tourism and Conservation it's extremely light touch and does little to outline principles and approaches to ensure the survival and evolution of what are very widely dispersed assets often in remote areas. There's no recognition of the imperative to understand why people find NN so attractive and thus the need to protect and preserve it. This economic factor must be a powerful counterweight in the inevitable balance to be struck over how much development and where; I suggest NN is the District most dependant on Tourism and Conservation. This crucial dependence for NN needs to be highlighted and supported with some underpinning principles and approaches to protect it and guide its evolution. I request another Agreement specific to tourism and its links with conservation generally but withy specific recognition of NN and the Broads Authority Executive areas in particular.	Section 5.3 covers Cross Boundary Strategic issues which includes a section on the coast and broads, however it is felt the NSF could be enhanced by including further information around tourism and the NSF has been update accordingly	NSF section 5 to be updated to include further reference to tourism.
ANON-3C85-CA87-K	Hockering Parish Council	It is essential that councils work together and consider the environment when approving expansion of businesses and also consider the suitability of the location of a business, regardless of its profit-making abilities.	Noted and Agreed	No change to NSF
ANON-3C85-CAFT-1	Resident	I find it interesting to reference the economy (especially in reference to quality of life and attractiveness for people to move/start businesses) without considering the contribution of organisations other than traditional businesses (ie VCSE sector). An inclusive growth strategy should reflect with outcomes of economic development on people and areas as much as development for the sake of development. Again seems to focus on job creation and not on the quality of job opportunities - education is one aspect but you need to also have aspiration to see the need for education at the start.	Agreed, and recognised as something to be included.	NSF section 5.1 to be updated to include reference to VCSE sector
BHLF-3C85-CAF9-6	Dereham Town Council	appreciate that this framework is pulling together a number of plans into a single document, put I must point out what I feel is an error which keeps repeating through all these documents.¶ As I understand it the Breckland Council’s employment land study was completed at a time when it was anticipated that Thetford would see a greater housing growth and Dereham less growth. Since the employment land study was completed Dereham has seen an increase allocation of housing and the duelling of the A47 between Tuddenham and Norwich has been announced. Dereham will be a reliable 15 minutes’ drive from the western side of Norwich (3 fast busses an hour from Norwich) , land prices are significantly lower in Dereham than in Norwich; Dereham therefore has potential for greater housing growth and employment growth.¶ We are looking at allocating additional employment land in our Neighbourhood Plan, and given that we have just lost half our employment land allocation to housing, I would be interested know how any employment land identified in the NP could be considered for classification as Strategic Employment sites and therefore protected, from housing development? ¶	The points raised are noted but are specific to Breckland DC and are a matter for their local plan.	No change to NSF
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	Other than Kings Lynn, much of West Norfolk has little employment variety other than tourism, property maintenance and elderly care. Should more be done to encourage high tech, light industry facilities in outlying areas?	Views are noted but are a matter for the BCKLWN local plan.	No change to NSF
ANON-3C85-CAXS-J	Resident	There should not be a total concentration on the "tourist" attraction of North Norfolk. As population growth shows a large percentage increase in the over 65 group in NN over future years there must be better jobs to keep younger generations (not those working in the lower paid tourist type jobs) in the area to maintain a better social balance. other opportunities to encourage other types of local businesses should not be overlooked.	Norfolk authorities recognise the need to encourage a balanced economy and encourage young people to stay in all regions however it is felt the NSF could be enhanced by including further information around tourism and the NSF has been update accordingly.	NSF section 5 to be updated to include further reference to tourism.
ANON-3C85-CAXF-5	N2RS - No to Relay Stations	Tourism is obviously important but I am concerned that there is insufficient focus on the rural areas outside of the main resorts and parks. Areas like Happisburgh and East Ruston are to be blighted by cable relay station developments (to support offshore wind farms) unless developers like Vattenfall are forced to use more landscape friendly technology. Whilst the popular tourist areas like Blakeney, Holt and Burnham Market are only really available to people with higher disposable income, many people offer good quality, affordable accommodation and services in the East Ruston/Happisburgh area and similar areas, and their businesses are at risk. These are beautiful rural areas, with farmland, wildlife, quiet lanes for walking, cycling and horse riding and easy access to the coast.¶ Great Yarmouth may reap the benefits of employment from offshore energy whilst rural communities take all the risk and lose their main asset - the countryside. ¶ NNDC and others need to be much more aware of these rural areas and the risk they are under. I tried to show a picture but the system won't take it even though it is a small file.	These instillations are outside of the NSF scope to address and would be a matter for local plans and national infrastructure. However enhancements will be made to cover economic aspects of rural areas.	NSF section 5 to be updated to include reference to rural economy.
ANON-3C85-CAXN-D	East Ruston Parish Council	Does the percentage of people in employment cover just those of working age or is it a percentage of the total population as North Norfolk has the highest percentage of retired people	Employment rates only include working age people	No change to NSF
ANON-3C85-CAXW-P	NUA	•¶ is pleasing to see that the growth potential of the Tech/Digital sector in Norwich is highlighted as offering potential for further economic growth, and hope to be consulted in any plans in support of this growth.	Support noted	No change to NSF
ANON-3C85-CAXA-Z	West Suffolk	West Suffolk supports the approaches advocated by the Norfolk Strategy Framework. We look forward to working together to achieve growth and consider that developments around the A11 would be best achieved after improvements are made to the A11 Fiveways junction.	Support noted	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited supports economic growth in Norfolk and the drive towards hi-tech and innovative business development. Attleborough Land Limited especially supports the development of the A11 Norwich-Cambridge Tech Corridor and the Snetterton advanced manufacturing and engineering centre. Attleborough Land Limited is committed to supporting economic development by accommodating workers and their families within the SUE. The Attleborough SUE is well placed to provide homes close to new employment opportunities along the A11 corridor.	Support noted	No change to NSF

BHLF-3C85-CAJB-K	Fen Line Users Association	Section 5. A10 Corridor. We concur with the County Council’s statement that “there is a need to improve journey times, reliability of services and enhancement of operational capacity” on the King’s Lynn-Cambridge-London routes. We draw attention to the current proposals for the 2018 timetable, which would result in longer journey times on the King’s Lynn-King’s Cross route. As evidence, we refer to the Media Release issued on Wednesday 19 July 2017 by the Borough Council of King’s Lynn & West Norfolk and which is to be found at: https://www.west-norfolk.gov.uk/news/article/258/proposed_2018_great_northern_timetable . The Release was issued in conjunction with the King’s Lynn Business Improvement District Ltd and ourselves. The Release states: “Despite the very welcome recent introduction of faster trains (capable of 110 mph south of Hitchin) on our line the proposals are for King’s Lynn - King’s Cross Fen Line services to become slower. The proposals mean average peak journeys of 113 minutes out and 110 minutes back between King’s Lynn and King’s Cross, an increase of up to 8 minutes, although most users will experience a greater increase. ... The concerns and request for changes and Government action expressed ... are shared with FLUA and the King’s Lynn Business Improvement District (BID).” Govia Thameslink Railway (Great Northern) acts for Government as a management contractor. The three bodies are therefore jointly calling on the Government to: •Explore ways of maintaining and improving existing journey times between King’s Lynn and King’s Cross (allowing for the additional, welcome, stops at the employment hub around the new Cambridge North station). •Honour the clear commitment in the Phase 1 consultation for trains “every 30 minutes” between King’s Lynn and King’s Cross during peak times (arriving 0700-0959 at King’s Cross and departing there 1600-1859). This is something that has now been cut back in the current Phase 2 consultation. •Introduce trains “every 30 minutes” between King’s Lynn and Cambridge/Cambridge North during peak times (i.e. arriving 0700-0959 at Cambridge and departing there 1600-1859). The second track between King’s Lynn and Watlington and between Downham Market and Littleport was removed as an economy measure in 1984/5. The anachronistic single line bottlenecks impose severe limits on the scheduling of trains, leading to the longer overall journey times now being proposed. The three bodies are therefore further calling on Government to: •Adopt a minimum two-track railway between King’s Lynn and King’s Cross, equipped to accommodate 12-car trains, as a clear long-term strategic aim. Ensure that short-term plans are fully assessed to ensure they do not conflict with this ultimate goal. •Instruct the West Anglia Task Force to develop proposals for full re-doubling of the single line sections to remove the root cause of delays and timetabling constraints north of Ely.	Noted and agreed	No change to NSF
ANON-3C85-CAJG-R	Resident	The proposals show no recognition that people in North Norfolk need local employment opportunities, including to supplement pensions. The area must not just become a national park with only tourism and some seasonal agricultural work. There is a real danger North Norfolk will just become a tourist, second home and commuter belt for Norwich and Cambridge; rather like the south coast of England.	Norfolk authorities recognise the need to encourage a balanced economy and encourage young people to stay in all regions however it is felt the NSF could be enhanced by including further information around tourism and the NSF has been update accordingly.	NSF section 5 to be updated to include further reference to tourism.
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Table 6 demonstrates the urgent need for improved supply of housing.	Noted	No change to NSF
ANON-3C85-CA62-F	Resident	I am very concerned that a "Food Enterprise Zone" is proposed for a green field site off the A47. This is one of the last areas of unspoilt countryside near Norwich. Presumably the idea is to completely surround Norwich with industrial areas? This will make countryside even more difficult to get to from the city and reduce residents' quality of life. Will this development lead to further road building? How does this fit with your aim of reducing car usage in favour of public transport, cycling and walking, when anyone working on the site will need to drive there? 	Concerns noted however this site is of strategic importance to improve the balance spread of economic opportunity in Norfolk	No change to NSF
ANON-3C85-CAJF-Q	Resident	1 The analysis given leads to concern that Agreement 9 is insufficient and watered-down to ensure that the necessary infrastructure for economic growth is delivered. If it is not, then areas of the county will house a growing retired age population (see section 4) but without the economic activity to support it. 2 The dominance of the Norwich economy is recognised but the strength and importance of the Cambridge economy to West Norfolk is not. This is a significant strategic planning flaw and needs to be addressed. 3 There has to be real consideration not only to the provision of transport infrastructure but also transport services. NCC has progressively withdrawn bus subsidy leading to young people accessing low paid jobs in real difficulty, and this will hamper growth in tourism in North and West Norfolk in particular. 4 The importance of the A10 corridor is recognised, but it appears to only be between King’s Lynn and Downham Market, whereas the entire corridor through into Cambridgeshire needs a comprehensive development plan. To refer to the intra-Norfolk bit and then say that Cambs CC is developing a plan for its area means that the section South of Downham Market is not covered yet this is where much of the traffic growth is likely associated with the Bexwell employment development site. 5 In the same corridor there is mention of rail. In this area, unlike the rest of Norfolk, rail has declined and is schedule to experience a significant, planned, deterioration at the end of 2018. With this background, and without a reversal of current rail infrastructure policy, economic growth will be severely hindered, and expectations of development at King’s Lynn and Downham Market not realised, unless the A10 is significantly developed instead. 6 Hardwick Extension in King’s Lynn is shown as designated for industrial type employment growth but recently signage at the site implies it has been redesignated for retail growth, and this will have very considerable, but apparently not planned for, implications for road network capacity and negative impacts on the Town Centre and the local bus service network.	1 Concerns noted 2 Concerns noted however there are a number of references to this area including reference to the A10/A47 corridor 3 Concerns noted but Bus Subsidies are outside the scope of this document 4, 5, 6 Concerns noted but further details in these areas are for the BCKLWN local plan	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	10) Section 5: Investment in resource protection, adaptation to a changing climate, management of flood risk, development of low carbon energy and products all have potential for improved economics. Norfolk has need of, and great potential in, exploiting these opportunities (and especially because of the advantages this can bring to other aspirations identified). 11) Bottom of page 28, last sentence – does this need to be finished off by saying ‘...tightly drawn around flood plains’?	Point 10 noted and document updated. It is felt that point 11 does not add to the document.	NSF section 5 to be updated to include reference to point made.
BHLF-3C85-CA38-J	Pegasus Group on behalf of Intu	5.3 Key Cross-Boundary Economic Issues and Interventions The role of Norwich The Strategy recognises that Norwich and its immediate hinterland is the 'prime economic generator in the County'. It is considered however that the City Centre should be afforded more recognition in its role of generating local employment and creating places where people want to live, visit and work. An additional sentence should be introduced under the heading 'The role of Norwich' as follows (at the end of the second paragraph): A healthy and vibrant Norwich City Centre is essential to Norfolk's economic well-being and its retail and leisure needs should be met in full to ensure its continued vitality and viability.	We feel the wording in the role of Norwich covers the point made already.	No change to NSF

BHLF-3C85-CA3P-A	Heaton Planning Limited on behalf of Brett Aggregates	Section 5 – The Economy Paragraph 5.3 Key Cross Boundary Issues and Interventions This section of the document refers to the strategic economic matters which should be addressed through Development Plans. As referred above, it is our view that minerals and waste development should be referenced as a strategic priority. The latest Local Aggregate Assessment (October 2016) identifies Norfolk as a County with significant sand and gravel resource and up to 30% of total production is exported outside of the County. In addition, Norfolk imports up to 70% of all its crushed rock requirements. This is a significant cross boundary issue which should be addressed as an economic strategic priority. As well as demanding a large proportion of material imports for infrastructure needs, the Norfolk area will need to ensure that the local highway network is adequate to transport mineral to serve local development needs within as well as that outside of the County. The County will need to ensure that it plans for a level of mineral provision to take account of growth and infrastructure requirements from within the County as well as demand from outside the County boundary.	Whilst approximately 20% of Norfolk’s total production of sand and gravel was exported out of the County in 2013 a similar amount was imported into the County. Aggregate movements are discussed in the Local Aggregate Assessment and it is considered that whilst neighbouring planning authorities continue to plan to supply the demand of their own areas, Norfolk does not need to make planned provision to supply additional aggregates. Therefore it is not considered that this is a strategic cross-boundary issue to be addressed in the NSF and it will be adequately addressed through the production of the statutory Minerals and Waste Local Plan. Whilst Norfolk imports over 70% of all its crushed rock requirements, this is due to Norfolk’s geology. Therefore it is not possible for this situation to change through any statutory plan or strategic framework and it is not considered necessary for this to be addressed as an economic strategic priority in the NSF. The County will ensure that it plans for a steady and adequate supply of aggregates. The level of mineral provision will be determined through the Minerals and Waste Local Plan Review, in accordance with National Planning Policy and Guidance, which detail the information to be included within a Local Aggregate Assessment, including possible future demand. It is not considered that replicating this process in the NSF would add any value to the statutory Minerals and Waste Local Plan process.	No change to NSF
BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	Growth: The plan clearly identifies some important trends which are likely to occur within this period. It notes in particular that there will be growth in terms of population, economic development (including tourism) and housing. Much of the growth in jobs is expected to occur in the greater Norwich area but corridors of growth are identified between Cambridge and Norwich, King’s Lynn and Cambridge and along the A47 corridor between Norwich and King’s Lynn. A number of interventions are planned in a new economic strategy to be published in 2017. Population as a whole is projected to grow by 14 % (2014 to 2036) with most of the growth occurring in the over 65s population which is projected to increase by 46%. This increase in the over 65s is especially marked in South Norfolk, Breckland and North Norfolk. Despite the relatively stable population for the under 65s, the number of jobs is projected to grow by over 60,000 of which about two thirds is in the Norwich area. It is expected that housing will grow to accommodate the growth in household formation but that excludes the need for social care where a deficit of over 8,000 care home places is projected (as against 9,900 care home places and a deficit of 600 now). Comment: With a recognition of increasing longevity there is a growing demand from the over 50s for physically active recreational activities which help manage risks of ill health through diabetes, heart attacks and strokes. Awareness of risk, including the lack of care facilities, appears to be driving more healthy behaviour and creating a fitter more active cohort of retirees. Health walking, rambling and strolling activities are being promoted as an effective and safe means of retaining good health and we are likely to see a significant growth in these activities as the population of over 65s increases. Variety of route and surroundings is an important feature of walking. The nature of the demand varies and ranges from individual short circular walks or strolls of up to 3 miles, brisk organised group walking usually around 3 miles and longer group led circular walks, mostly between 4 and 10 miles. Longer walks of up to 20 miles are usually the choice of younger and fitter walkers. City walking as an alternative to the use of cars will grow too but this is a more journey based, repetitive activity. We comment later on the steps already taken to develop rural walking infrastructure and the challenge of maintaining a viable network of public rights of way (PROW). At this point our main point is that the growth of the over 65 population is very significant and we believe that it is an omission of the report to fail to reflect the growth in their walking activities and the likely consequences for green infrastructure. Economy The document notes the importance of tourism businesses, which are more dispersed than many other economic activities - and far wider than “Norfolk Coast, the Broads and the Brecks” listed. Comment: Norfolk has a number of promoted ‘Norfolk Trails’ across the county, plus, in many locations (though not all), a good network of PROW. Together these can constitute an opportunity to promote the county as a good destination for walkers and cyclists, but one that is not located within specific localities.	Work is being completed around recreation pressures and the reference to recreation in the NSF will be updated.	Reference to recreation to be included section 5.
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	1 The dominance of the Norwich economy is majored in the NSF and we recognise the fact, but the very different economy in West Norfolk is largely ignored. To take account of it requires some modification to investment policies and agreements and this is essential. 2 Infrastructure provision is discussed in much greater detail in answer to question 15, but it is clear that if the economic analysis is flawed then so too will be the infrastructure investment decisions. As it stands, the NSF is in danger of leading to flaws in those decisions and this needs to be rectified from the outset. 3 The vision for reduced need to travel to work, retail, employment and education is welcomed but this also has significant spatial planning implications. The NSF is directly at odds with current West Norfolk policies which have been to focus employment and retail on the edge of the town, which by definition makes it less accessible by sustainable means of transportation and more so by car use. This is therefore encouraging modal shift from other forms of mobility towards the car, contrary to the NSF vision. The apparent recent redesignation of Hardwick Extension employment area (aka Morston Point) to be majored as a 33 acre retail development area is evidence of this. Not only do such edge of town developments lead to greater use of unsustainable transport modes, it also has the potential to undermine the historic town centre retail offer further making that less sustainable as well. It is not credible for the Borough Council to consider signing to the NSF whilst encouraging such unsustainable development. Ways in which this can be mitigated are in answer to question 15.	Points are noted however it is considered that towns in the West of the region are not ignored in the NSF, there are a number of areas of the county where the economy differs, the aim of the NSF is to identify the key cross boundary issues for the county. The matters raised regarding the West of the region are a matter for BCKLWN.	No change to NSF

BHLF-3C85-CA3J-4	The Somerleyton Estate	The Framework goes on to state that “The Norfolk Local Authorities are committed to strengthened collaboration and focus on new initiatives and interventions to help nurture economic growth in higher value, knowledge based sectors across Norfolk”. If these ambitions are serious then the Somerleyton Estate urges the Norfolk Strategic Framework Partnership to recognise the opportunity provided by value added tourism and to develop shared objectives to facilitate and support resorts such as Fritton Lake whilst more ‘traditional’ seaside tourism offers wane. In Section 5.3 ‘Key Cross-Boundary Economic Issues and Interventions’ there is a section on the ‘Norfolk Coast, the Broads and the Brecks’. This section should be expanded and renamed as ‘Norfolk’s Visitor Offer’ or similar in order to avoid missing an opportunity to support the whole of Norfolk’s tourism industry. In Section 5.4 ‘Strategic Principles of Economic Success’ and under the sub-heading ‘Supporting future economic growth’ the Somerleyton Estate request that an additional bullet point is added to read: • Facilitating the evolving tourism industry whilst safeguarding the environment upon which it relies. In Section 5.4 ‘Strategic Principles of Economic Success’ and under the sub-heading ‘Connectivity’ the Somerleyton Estate request that the first bullet point is amended to read: • Supporting employment allocations and the rejuvenation of town centres and high streets as retail destinations that minimise travel distance and maximise the use of sustainable transport modes. Tying in to our comments on road improvements below it is important that improving roads links is considered alongside the vitality of retail centres such as Great Yarmouth as improved transport links can also divert shoppers and visitors, by car, from our town centres to out of town retail parks which is less sustainable than focussing such activity on the high street.	We recognise the points raised and reference to tourism are to be strengthened in section 5 of the NSF	NSF section 5 to be updated to include further reference to tourism.
BHLF-3C85-CA3J-4	The Somerleyton Estate	It is important to note that more short or additional holidays are now taken in the UK rather than long holidays, and the long main holiday in the UK has declined significantly. The growth of short breaks is reducing seasonality but this is predominantly weekend based in its demand, and seaside destinations have experienced lower growth than city destinations. The consequences of these trends for Great Yarmouth are likely to be: • increasing demand for quality, convenience and security • increasing demand for activities, relaxation and learning skills • increasing demand for 1–3 night holidays • increasing demand for ‘one person’ holidays • increasing shoulder month demand • increase in grandparents taking grandchildren on holiday (and a desire for more traditional holiday activities) • a family market more accustomed to higher standards and broad range of leisure options • growth in VFR market (Visiting Friends and Relatives) • arts, culture and history featuring strongly in destination choice • increasing success for new, authentic and innovative holiday concepts and products that distinguish themselves by added value • increasing demand for ‘holidaying with the tribe’; be they friends, sporting groups, reunions etc. “ The Framework states “Many districts have their own economic development strategies, and there is a good record of collaboration on specific economic development projects. This Framework provides the opportunity to lay the foundation for developing strategy and such cooperation going forward”.	See above	NSF section 5 to be updated to include further reference to tourism.
BHLF-3C85-CA3J-4	The Somerleyton Estate	Comments about Section 5 - The Economy Section 5 sets out the Strategic Economic Objectives required to realise the economic potential of Norfolk. Absent from the bullet point list of objectives, as with Section 2 discussed above, is tourism. Please add the following bullet point as an important Strategic Economic Objective: “To realise the economic potential of Norfolk and its people by:” • Supporting the County’s tourism offer and the environment upon which it relies. In the Introduction (Section 5.1) the Somerleyton Estate is heartened to see tourism get its first mention in the Framework document as one of the key business sectors. However tourism is then subsequently described as a lower wage, lower skill sector which along with other sectors such as food production and agriculture is said to impact on future economic growth. The Somerleyton Estate is concerned that the Framework may miss a vital opportunity to support a resurgent ‘Value Added’ tourism sector providing, though resorts such as Fritton Lake, opportunities for “more frequent, higher quality and good value breaks”. Please see links below for evidence of the benefits of value added tourism to the emerging quality short breaks tourism market in East Anglia: http://www.newanglia.co.uk/our-priorities/sector-groups-and-contacts/tourism/ http://www.newanglia.co.uk/wp-content/uploads/2013/11/CTC-New-Anglia-final-report-Jan13-Web.pdf Also from the Great Yarmouth Tourism Strategy and of direct relevance to the Fritton Lake Resort (http://www.frittonlakelodges.co.uk/) offer: “The Great Yarmouth Opportunity Great Yarmouth, with its thriving public/private sector tourism partnership, sees itself as a key partner in the delivery of these national and regional objectives.	See above	NSF section 5 to be updated to include further reference to tourism.

BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	Section 5 The Economy (and Strategic Employment Sites) ¶ Section 5 - 5.2: Although much is made in the Introduction (Section 2.1) and elsewhere about the importance of exploiting links to thriving markets in Cambridge and the wider South East, it appears that the bulk of strategic growth sites are clustered around Norwich and biased towards the A11 Road Corridor. Surely more focus should be placed on the Kings Lynn-Cambridge-Stansted (M11)- Eondon Corridor? This offers greater (and growing) opportunities for business growth / interactions and access to job opportunities in places where the job market is thriving (and demand outstrips supply) via sustainable commuting patterns along the railway line? ¶ Norfolk Coast, the Broads and the Brecks ¶ This section pays scant attention to the north coast / AONB – recognising few of the unique qualities and current pressures. It would be helpful in particular to consider the value of ecosystem services, their contribution to the economy and the economic implications of growing pressures on the AONB – both from tourism, growth in housing and growth in second home ownership. What are the challenges going forward and how can a cross-boundary approach help solve these? This may help support any post-Brexit Conservation issues. ¶ Mention is made in this section of the Shoreline Management Plans and notably to the co-operation between the coastal districts, Broads Authority, Waveney District Council in Suffolk, and the Environment Agency. There are however no clues as to what is being done to “developing understanding of the technical and political challenges involved, and coordination of efforts to address these”. For example, Holme is faced with the future possibility of an Inter-Tidal Zone covering some 40% of the Parish (including the National Nature Reserve at Holme Dunes). What strategic plans are being made to compensate for this – both in terms of loss of local amenity, damage to freshwater habitats and damage to the local economy? ¶ A10 Corridor ¶ The potential of the A10 Corridor is picked up in this section (although the distinction between road and rail connections is not always clear). Is the County Council collaborating with Cambridgeshire County Council in its studies of the economic potential and transport options for the route north of Cambridge (and if so it would be helpful to include this in the NSF document)? What plans are in place to exploit the imminent availability of longer peak hour trains from King’s Lynn to Cambridge / Kings Cross (by the end of 2018) and to help West Norfolk residents access the opportunities associated with planned growth around Cambridge North? Is there an integrated transport strategy to support the exploitation of these opportunities? It would be helpful to explain the approach in this document. There is considerable support for the re-introduction of a rail service between Hunstanton and Kings Lynn. This is a strategic issue and could completely change the accessibility surface of the west of the County, bringing benefits to the economy / regeneration and considerable benefits in terms of relief to congestion and associated traveller time savings on the A149. Should the NSG be paving the way for a study of the options (heavy vs light rail / tram or a guided bus that could provide flexibility beyond the rail termini)? ¶ This point is also relevant to Section 5.4 of the NSF – Connectivity.	Regarding the first point, the NSF does cover the A10 corridor which covers the Norfolk section of the area mentioned. Regarding the second point the coastal area is already covered within the Economic section. Regarding the third point, the points raised are matters to be taken forward in the SMP. Finally regarding the A10, it is not practical to cover the points raised in a Strategic document like the NSF and is a matter for more specific local plans.	No change to NSF
ANON-3C85-CA6Q-E	Resident	It has been observed that Scottow Enterprise park is a strategic economic area of importance, and thus guarded against conversion of industrial area into housing area. However, the outlying areas which will then take the burden of housing must be assured that the infrastructure to support the domestic side of life will be considered as part of the strategy.	Point noted however this is a matter to be addressed in local plans.	No change to NSF
ANON-3C85-CA61-E	Define Planning & Design Ltd	The emphasis on realising the economic potential by seeking to facilitate development to support the region’s business sectors and clusters is fully supported. Moreover, it is considered essential to provide for job growth in line with housing provision and to improve the alignment between locations of workplaces and homes. In doing so, whilst the strategic influence of infrastructure improvements between the main urban settlements may be prioritised, it will also be important for Local Authorities to focus on securing digital and transport connectivity generally within and between settlements across the region that offer development opportunity. In doing so it will support the potential for growth across a wider area and the rural economy, supported by the market towns.¶	The NSF is consistent with the point raised.	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	Hoveton Parish Council was pleased to note that the nearby Scottow Enterprise Park has been included on the list of Strategic ‘Tier One’ Employment Sites, and that it will be the focus of investment to drive increasing economic development. However, the Council would also like to see a similar commitment being made towards investment in the local tourism industry, which is so important to the Broads, the coast, and rural villages. For North Norfolk, tourism is worth about £500 million a year, and the industry employs over 10,000 people in various roles; it’s the equivalent of several Tier One employment sites. Similarly, the wider North Norfolk economy is very diverse – medium, small, and micro businesses are the life blood of our community, and the Parish Council feels it is vital these smaller businesses are helped to thrive. ¶ The Parish Council would also welcome a strong and visible commitment to the regeneration of local village centres. Nearby market towns such as North Walsham and Stalham have been adversely affected by the arrival of large supermarket chains, but Hoveton has also suffered in recent years, in this case from the closure of several local bank branches and a noticeable rise in the number of vacant commercial properties (the derelict ‘waterside rooms’ on Station Road being one notable example). ¶ As the draft Norfolk Strategic Framework states: “economic benefits of the Coast, the Broads and the Brecks include not only their attraction for tourism and recreation, but also their contribution to quality of life, and hence the attractiveness of Norfolk as an area to live, work and to locate a business. The economies of these areas are dependent on businesses, infrastructure and environmental protection in surrounding areas.” Hoveton Parish Council agrees with this statement and believes this highlights the need for the continued provision of local jobs, as well as the importance of protecting the local countryside, areas of conservation and wildlife habitats (because the local countryside is why many visitors come to Norfolk and spend their money).	The NSF is consistent with the points made however some of the details raised are for local plans to address.	No change to NSF
BHLF-3C85-CA3G-1	Dereham Town Council	The County’s focus on economic development seems to focus on the A11 Cambridge – Norwich Technology corridor (figure 6 page 27) but seems blinkered to the rest of the county. While there is no doubt that the A11 offers potential for economic development the same is equally true for other parts of the County with good communication links to Norwich. The economic development focus is important because it forms the basis for identifying Tier 1 Strategic employment sites (figure 5 page 24). Tier 1 Strategic Employment sites are important because they are the only employment sites which are protected from loss to alternative use such as housing. Even though employment sites are allocated in Dereham in the Local Plan these are not protected for employment use as has been demonstrated in Dereham recently it is all too easy for to housing. ¶ The Town Council has aspired to have strategic employment site in Dereham, the argument for such a site is that Dereham is very close to Norwich with good communication links the completion of the dualling of the A47 will improve connectivity even further. Arguments used in the Framework to support the focus on the A11 corridor could equally be used to support the inclusion of an Accessible Extension to the A11 tech-corridor along the A47 to Dereham. ¶ The A11 corridor is seen as a key corridor because of its recent dualling. The same argument could be made for the completion of the dualling of the A47 between Norwich and Dereham. The completion of the dualling of the A47 between Dereham and Norwich is noted in page 14 and acknowledged that it could bring economic benefits, there is however no strategy in place to exploit benefits of the Government’s investment in Dereham. ¶ The framework states that “Norwich and its immediate hinterland is the prime economic generator for the County”, (page 26). Dereham sits well within the Strategic Functional Economic Market Area for Norwich (page 23). It could therefore be argued that Norwich and the A11 corridor should not be considered as the only economic growth areas. Any area within the Norwich Functional Economic Area with good transport links should be looked at as strategic employment areas (e.g. Dereham). ¶ The A47 Corridor is discussed on page 28, where it states that it “acts as a break on economic growth, hindering investment”. While this may be true, if the entire length of the A47 is looked at as a whole, but not if the section between Dereham and Norwich is considered. The framework recognises that improvements to the A47 will “unlock jobs, increase GVA and attract additional private investment” but even though such improvements to the A47 (dualling between Tuddenham and Norwich) will be completed by 2020 the Framework does not recognise the potential of this investment for economic development in Dereham. ¶ Greater focus should therefore be given to economic development and employment growth in Dereham, allocating Tier 1 employment sites. ¶ The employment projections are based on a retirement age of 65, pension age is set to increase to 67 during the life time of this framework this will have the effect of adding additional numbers to the working age population, this does not seem to have been taken into account. ¶	The points raised are noted however there is more to the strategic importance of the A11 than dualling, eg linking Cambridge to Norwich. The matters raised regarding allocation of employment sites in Dereham are outside the scope of the NSF and are a matter for Breckland local plans.	No change to NSF

ANON-3C85-CA3Y-K	Lanpro Services Ltd	We recognise and support the value and importance of job creation. We note that only 34% of the target job creation of 95,000 between 2012 and 2026 has been met, while only 16% of the required housing and just 2.6% of the productivity gap has been closed. This indicates that although progress has been made, there is not a strong record of delivery against economic and employment targets. The Framework recognises that additional economic interventions are required. The £200m private sector investment is welcomed, but we feel that a more proactive and positive planning approach could assist in enhancing this position. The focus on strategic employment sites is welcomed, but it is a disappointing that the same approach is not always made with regard to locations for strategic housing. The employment locations selected leave large amounts of the County, particularly the central more rural area, with no significant employment investment and no real prospect of new jobs being created. Within this central area there are also examples of locations where there is low salary and skill attainment and aging populations. The proposed approach of a predominance of small housing sites in existing towns and villages, will in some part respond to this deficit. Nevertheless, we feel that this approach will not deal with some of the fundamental issues of poor quality unaffordable housing not currently available to most employees, particularly those working in agriculture. Larger sites and new settlements can provide the potential to provide a higher quantum of affordable housing, which will support the local economy by providing good quality homes. Good quality housing supports better productivity particularly where workers are in attractive environments, which provide easy access to work places. Furthermore, a new attractive garden town or village community might encourage greater leakage of economic benefits from existing centres into central Norfolk, particularly when there are excellent public transport connections. We therefore recommend that economic investment cannot be considered in isolation. It needs to be an integral part of a strategic approach to settlement planning. This should be linked to existing and potential economic hotspots, possibly through new road and rail infrastructure investment, and provide opportunities for a quantum of development that will enable the levels of affordable housing required to meet the needs of a large number of low paid workers found in many parts of Norfolk. This could also help encourage a ‘ripple’ of economic investment from the major centres, whilst also reflecting modern ways of working, such as the growing and predicted future trend of home working. This would help develop local economies, without detriment to the main centres of growth and investment.	The points raised are noted however the allocation of sites and a new town are for local plans to address.	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	p23 - reference is made to the Industrial Strategy. See representation attached which was made to BEIS on the failure of the Industrial strategy to recognise 'place' as a key dimension of competitiveness. The BG PL&M group would advocate the Norfolk's qualities are heightened through robust planning based on the identification of the key assets and qualities of the county. This will stimulate business and investment commitment as more business on a global basis are making locational decisions on the basis of the quality of life proposition and attractiveness of location. This is on the premise of a full and efficient digital coverage. This must be the NDF number one infrastructure priority. See 'Place Competitiveness' document attached earlier setting out research we propose to undertake to consider the critical characteristics of 'place competitiveness' in the new economy, taking into account the key geographical characteristics of Norfolk through interrogation of a range of business in-movers and to Norfolk and rapid growth companies. The gap divergence DCLG economic and housing forecasts needs to be more fully interrogated and the implications thought through. If DCLG is making false assumptions on teh level of potential growth this will either foist the county with undeliverable sites, or unproductive in migration, which will be expensive to service in teh long run. It is not the job of the county to service the housing problems of the metropolitan areas with cheap land.	Key issues raised are dealt with in the New Anglia LEP economic strategy.	No change to NSF
ANON-3C85-CA31-B	Wroxham Parish Council	Wroxham presently has few employment areas with none of them industrial. The emphasis on tourism is welcomed however it is pertinent to note that growth in Wroxham is inhibited in one way or another by the inadequacies of the A1151. Congestion, pollution and gaining a reputation nationally as an unwelcome bottleneck. Consideration therefore has to be given to by-passing Wroxham and Hoveton in order to improve traffic flow, reduce pollution and allow both villages to regain reputations for peace, relaxation and must visit locations. There is an acknowledgement that the nearby Scottow Enterprise Park has been included on the list of Strategic ‘Tier One’ Employment Sites, and that it will be the focus of investment to drive increasing economic development. it should be noted that this will further add to the traffic and pollution on the already congested A1151. The Parish Council would also welcome a strong and visible commitment to the regeneration of local village centres. Nearby market towns such as Alysham, North Walsham and Stalham have been adversely affected by the arrival of large supermarket chains, but neighbouring Hoveton has also suffered in recent years, in this case from the closure of several local bank branches and a noticeable rise in the number of vacant commercial properties (the derelict ‘waterside rooms’ on Station Road being one notable example). A bypass would act as a stimulus to economic development in these areas. Wroxham Parish Council believes there is a need for the continued provision of local jobs, as well as the importance of protecting the local countryside, areas of conservation and wildlife habitats (because the local countryside is why many visitors come to Norfolk and benefit the local economy).	The points raised have been noted, the relevant planning authorities will continue to address the local issues	No change to NSF
ANON-3C85-CA35-F	Tunstead & Sco Ruston Parish Council	Greater support by moving public offices and workers away from Norwich and to Gt.Yarmouth and Lowestoft. Those working in Gt.Yarmouth and Lowestoft should be offered incentives to live locally in those areas and if necessary be given disincentives not to live in Norwich and work outside the city.	The point raised is outside of NSF remit to control.	No change to NSF

BHLF-3C85- CAC8-2	Suffolk County Council	5.2 Strategic Employment Sites It would be useful in moving forward to have further discussions in relation to a common policy protection approach to strategic sites which have Enterprise Zone status in particular where they are part of a common initiative such as Great Yarmouth and Lowestoft 5.3 Key Cross-Boundary Issues Cambridge to Norwich Technology Corridor Suffolk LAs are supportive of this initiative and are making contributions towards the further work being carried out. The opportunities for the West Suffolk area should also be noted. The role of the A11 in this corridor is key and the improvement of the Fiveways Junction at Mildenhall remains as an on-going concern for the effectiveness of this route. The Suffolk LAs would welcome a reference in the Framework of the importance of Highways England dealing with this issue. Ports of Great Yarmouth and Lowestoft The common issues for these two towns have been recognised for many years and the linkages have been strengthened recently by both of their involvement in the offshore wind energy industry. There should be continued close cooperation between the respective councils, not least because planned growth in both is likely to lead to development towards each other. Within Suffolk, the proposed Third Lake Lothing Crossing is likely to lead to transport benefits for southbound traffic from Great Yarmouth as well as for Lowestoft itself. Broads and Brecks This section refers to coordination across planning authority boundaries to maximise economic benefits. It would be useful to include wildlife in the list of subjects to be tackled. The section refers to the formal status of the Coast AONB and the Broads National Park. It might be appropriate here to refer to the importance of the Brecks, having the richest assemblage of rare biodiversity anywhere in the UK. The Framework refers to joint working to gain a better understanding of impacts on environmental assets. This should refer to joint working within Norfolk and cross-border. This could be amplified by a sentence such as "Joint approaches to strategic HRA mitigation should particularly be developed where necessary, following the RAMS (Recreational Avoidance Mitigation Strategy) developed for the Thames Basin Heaths, Poole Harbour, the Solent and in East Suffolk (Ipswich, Babergh, Suffolk Coastal DCs), specifically to overcome the challenges of multiple LPAs overlapping European sites (SACs, SPA & RAMSAR)"	Ongoing work between these authorities in relation to Great Yarmouth and Lowestoft is welcomed and already taking place. Wording changes have been made around these points.	NSF section 5 to be updated to include further reference environmental aspects and Great Yarmouth and Waveney joint working.
ANON-3C85- CA3K-5	Natural England	Norfolk Coast, the Broads and the Brecks p29 The wording of the third paragraph on the page is a bit clunky and unclear and we suggest it could be re-worded as follows: "The quality, importance and diversity of the natural environment, including the Coast, the Broads and the Brecks, is reflected in the numerous national and international designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, and Sites of Special Scientific Interest (SSSIs), and protected landscapes (Norfolk Coast Area of Outstanding Natural Beauty and the Broads "National Park"). The planning authorities have a role in helping to protect and manage these assets, along with Natural England, the Environment Agency and a wide range of non-statutory environmental and community organisations. Ensuring that new development can proceed sustainably without harm to protected sites or species, or to biodiversity or geodiversity in the wider environment, is a particular challenge. Through joint working and cooperation across planning authority boundaries, a better understanding of the potential impacts from development (especially relating to housing and recreation) is being developed, and new ideas and best practice for monitoring and mitigating any impacts are being shared ."	Agree to change the wording as specified	Paragraph updated
ANON-3C85- CAC4-X	Stalham Town Council	As mentioned in Section 1, I would not wish to see Stalham lose businesses at the expense of extra housing.	This is a matter for local plans but there is nothing to suggest this will happen.	No change to NSF
BHLF-3C85- CACM-Q	Savills	Objection is raised to the wording of the third bullet of the listed Strategic Economic Objectives (p22), as this implies that authorities should only seek to provide the level of job growth necessary to serve the population. This is considered to be a particularly conservative approach which is contrary to the overall vision for the County and its aspirations to significantly uplift economic performance in Norfolk as outlined on page 7. Instead, we would suggest that an appropriate level of housing be provided to stimulate and drive economic growth. Not only is housing necessary to support existing business but an available workforce would attract future investment into the County in the long term. We would therefore encourage the Council to apply an employment uplift and suggest the following wording: "Providing the level of housing necessary to support Norfolk's growing economy and improving the alignment between the locations of workplaces and homes."	Discussions with authorities involved in the production of the NSF have concluded that the existing wording in the NSF is preferred	No change to NSF
BHLF-3C85- CAC2-V	Albanwise Ltd	Agreement 8 - The above list of locations are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses. Summary: Albanwise Ltd supports the inclusion of Bexwell as a Tier One Employment Site as identified in Table 7 and considers it is well placed as a location for strategic employment growth given its access to the strategic road network (including planned improvements on the A10 corridor), committed employment land which benefits from an extant permission and the use of part brownfield land associated with the former airfield. The site forms part of Albwanise's significant landholding in this location which also includes land to the North of Downham Market being promoted through the King's Lynn and West Norfolk Local Plan review for residential development. Although predominantly green field, the principle of development at Bexwell Business Park has been established for many years through an extant permission for employment uses and a hotel and golf course. It also comprises part brownfield land associated with the former Bexwell airfield. It remains available and is being promoted for employment purposes. Section 7.7 notes that away from the strategic road network, Norfolk's roads are largely rural leading to slow journey times. Therefore, development sites should be focussed on the strategic road network: including at Bexwell Business Park which benefits from excellent access to the strategic road network being located directly on the A10. It can make a significant contribution to the employment needs of King's Lynn and West Norfolk, and can act as a growth location as identified in the New Anglia Strategic Economic Plan. As noted in section 5.3 of the Strategic Framework the New Anglia SEP identifies the transport corridor of the A10, and parallel rail line from King's Lynn to Cambridge as a strategic growth location. Cambridgeshire County Council is currently investigating enhancements to the corridor to stimulate economic growth and enhanced rail connections are planned by the end of 2018 with longer peak hour services running to King's Lynn. Large-scale job growth in the corridor at Downham Market compliments this aspiration and as a strategic employment site it can take advantage of planned improvements to the strategic transport corridor. Furthermore, Bexwell is in close proximity to part of Albanwise's estate at North Downham Market being promoted through the King's Lynn and West Norfolk Local Plan review. Opportunities exist for a sustainable growth strategy, including the linked provision of homes and jobs at North Downham Market. This could include sharing infrastructure costs such as access from the A10 and improved pedestrian connections between Bexwell and the eastern edge of Downham Market. It should also be noted that regular discussions have taken place with the Economic Development Officers at King's Lynn and West Norfolk Council who feel it has significant potential to provide new jobs in the Borough.	The points raised are noted however the matters raised regarding employment sites are outside the scope of the NSF and are a matter for local plans.	No change to NSF

BHLF-3C85-CACN-R	Great Yarmouth Port Company Peel Ports	We respond as the Great Yarmouth Port Company as operators of the Port on behalf of the Great Yarmouth Port Authority and welcome the development of this strategic framework for the seven districts. The Peel Ports Group purchased Great Yarmouth Port Company in December 2015 with the aim of both expanding our influence on the east coast and to diversify into the offshore oil & gas and wind industries. Therefore we are pleased to see that the “boosting of inward investment and international trade” through means which include sea is included in Agreement 3, Proposed Shared Objective and is considered one of the key drivers to realising the economic potential for Norfolk. The We also note that the role of the Port is recognised in Section 5, The Economy, as a strategically significant economic and infrastructure resource. We would like to see a useful map which identifies the enterprise zones proximity to the Great Yarmouth Port and the Outer Harbour and how this further enables the offshore energy sector in this area. The Construction works to enhance the port infrastructure at Great Yarmouth Outer Harbour for several high profile offshore wind projects began in October 2016. A £7 Million investment by Peel Ports Great Yarmouth will support the construction of primary infrastructure and ground works for the Galloper Wind Farm and East Anglia ONE Wind Farm projects. Construction work includes the delivery of a yard storage and marshalling area, as well as the installation of heavy-lift quay facilities. This area will serve as the arrival hub for many of the key components of the Galloper Wind Farm such as nacelles, blades, towers and electrical modules, and as the base for the tower pre-assembly and nacelle preparation. These components will be shipped in from their manufacturing facilities and after preparation they will be loaded onto the specialist installation vessels for transport to the nearby development sites.	Support noted, the map referred to is too detailed to be included within the NSF as we would need to include one for all employment sites referred to.	No change to NSF
BHLF-3C85-CACG-H	Persimmon homes	Section 5 - The Economy (Agreement 8-9)The Persimmon Homes notes the location of Strategic Employment Sites (Agreement 8), and the aim forthem to be the focus of investment. These sites should be supported in Local Plans by sufficienthousing sites and investment in infrastructure to deliver housing. Where non-strategic employmentsites are no longer viable for employment use they should be released for housing.The Persimmon Homes note the requirement for Local Plans to include policies and proposals thatrecognise the importance of cross-boundary interventions to help deliver employment aspirations(Agreement 9), the same is true for housing. Support and interventions will also be required for cross-boundary housing schemes especially where they support cross-boundary employment ambitionsThe	Noted these matters are to be dealt with in local plans	No change to NSF
BHLF-3C85-CACC-D	South Norfolk Council	Key cross-boundary economic issues and interventions – chapter 5.3 The Council feels that the document concentrates too much on the major employment sites in the county. Whilst this is understandable, as a largely rural economy, the NSF should include some additional text recognising the important role that the rural businesses currently play, and will continue to play, in the county's economic performance. The In addition, the Council believes that the omission of the A140 in the list of principal strategic economic matters in this part of the document is somewhat surprising. The corridor has significant housing growth planned (at least 1800 homes in Long Stratton alone), the Long Stratton bypass, the main Norwich-London railway line passes through and it connects the two key settlements of the New Anglia LEP area, Norwich and Ipswich. Some appropriate text to address this lacuna is asserted to be necessary.The	Agree to add reference to general rural economy	Section 5 to be updated to include further information regarding rural economy
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	The Economy:The Tourism: should not be under-valued as a driver to the economy and there should be an emphasis on a high quality offer with associated income.The Agriculture: whilst this does not employ the number of workers it once did, agriculture ensures the protection of the rural countryside. It needs to be seen as a multi-faceted industry which not only drives the rural economy but creates the environment which results in such a high quality of life and draws tourists and new residents alike.The	It is felt the NSF could be enhanced by including further information around tourism and the NSF has been update accordingly	NSF section 5 to be updated to include further reference regarding tourism.
BHLF-3C85-CACS-Y	Norfolk County Council	Acronyms have been used without previously being stated in full. (SAC, The PA, SSSI)	Noted and document updated	Paragraph updated
BHLF-3C85-CAE4-Z	North Norfolk District Council	Agreement 8- Does not support this agreement as currently drafted - As a minimum it is considered that this Agreement should be broadened to make reference to the importance of other areas of the local economy such as strengthening the role of market towns, tourism and other rural growth sectors. This breadth in the economy is reflected elsewhere in the Framework document and should follow through into a revised Agreement. The Agreement 9: Agreed.	Agree to add reference to general rural economy, tourism and market towns	Section 5 to be updated to include further reference regarding market towns, rural economy and tourism
ANON-3C85-CAXW-P	NUA	•We would underline the importance of culture in supporting the economic growth of our city and county. It is a key contributing factor to a sense of place, and an important lever when attracting new business.The	The point raised is noted	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	Agriculture occupies 75%+ of the spatial area but the NSF does not seem to cover this greatly. Agriculture is facing the potential of great change on the loss of the Common Agricultural Policy and how it is addressed in policy terms over the next two decades is critical – to both its economic contribution, adaptation to a changing environment, and the social impacts in the rural locations. Again an integrated approach covering land and water management, rural economics, resource protection and enhancement (e.g. soils, food and carbon sequestration) and Green Infrastructure could be drawn out.	Agriculture not part of the planning process but is recognised as a vital part of the Norfolk economy.	Add reference to agriculture in Norfolk economy in economy section.

HOUSING COMMENTS

Response I	Organisation	Answer	Officer Response	Action
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	There are potentially serious side affects from the proposed 10% buffer in Agreement 16; housing should only be built where the strategic and local plans require them and we must not create situations whereby developers are allowed to build house where it's the easiest, sell well and are the most profitable. The real evidence shows that under delivery isn't being caused by the shortage of permitted sites; to that extent the 5 year land supply and under delivery criteria is allowing developers to build where they want to and thus strategic and local plans are being negated and over ridden. I don't support the use of a buffer and certainly not at 10%. Efforts should be directed to ensure developers only build on sites within local plans.	The points raised are noted but under delivery of planned developments requires a range of interventions. National guidance requires that plans should plan positively to meet needs and be sufficiently flexible to minimise risks associated with under delivery. The Agreement makes clear that buffers are not to be treated as part of the housing target for five year land supply purposes. The planning authorities will need to keep this issue under review and take account of any revisions to the calculation of OAN which are currently being consulted on by government. In some parts of the County where the proposed methodology would result in significant affordability uplifts further delivery buffers may not be justified	Add further text to the NSF indicating that the need for buffers will be subject to further review following the results of the current consultation on new approaches to establishing OAN.
BHLF-3C85-CAE4-Z	North Norfolk District Council	Agreements 10 -17 – That a formal decision to commit to providing a 10% buffer on housing targets should not be made until such time as the implications of the proposed revisions to the establishment of Objectively Assessed Housing Needs are clear.	The points raised are noted but under delivery of planned developments requires a range of interventions. National guidance requires that plans should plan positively to meet needs and be sufficiently flexible to minimise risks associated with under delivery. The suggested 10% buffer in Agreement 16 is considered to be an appropriate response. The Agreement makes clear that buffers are not to be treated as part of the housing target for five year land supply purposes. The planning authorities will need to keep this issue under review and take account of any revisions to the calculation of OAN which are currently being consulted on by government. In some parts of the County where the proposed methodology would result in significant affordability uplifts further delivery buffers may not be justified	Add further text to the NSF indicating that the need for buffers will be subject to further review following the results of the current consultation on new approaches to establishing OAN.
ANON-3C85-CAXS-J	Resident	There must be a strategy to bring more affordable housing onto the market. Developers are too easily able to get round the provision of these in small and medium sixe developments.	Agreed. Agreement 10 commits the Authorities to providing for all needs including for affordable homes. However it would be helpful to add reference to affordable homes after Agreement 14 which could also usefully make reference to the housing needs of the armed forces and self build. The specific approaches to provision including targets, site size thresholds and consideration of viability are matters best dealt with in individual Local Plans.	Amend text after Agreement 14 to include reference to affordable homes, self build and armed forces accommodation.
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 6.4 - this is the most challenging. The need for 26% of the total future housing requirement to be affordable is higher that that which is aimed for in West Norfolk at present where even at 20 % is not achieved. The increase in the number of beds in care homes from 9921 to 17949 by 2036 will have to be accompanied by a similar increase in the number of carers who will require training and accommodation at prices that they can afford. Para 6.5 Much of West Norfolk is constrained because of flood risk. It is time to re-assess the costs and benefits of a Wash Barrier to protect the Fens and the high quality agricultural land from flooding. It may well be less expensive than improving the flood defences all around the perimeter of The Wash as well as up the tidal estuaries. In addition a Wash Barrier could generate significant green electricity from the tidal energy that is secure and predictable. Naturally such a barrier would have an impact on the environment some of which would be harmful but other changes would be beneficial.	The need for affordable homes and specialist accommodation for the elderly are evidence based and must be addressed. This will be a significant challenge in some areas but it is nevertheless important that the framework commits the authorities to prepare local plan which address these issues.	No change to NSF
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	Can more be done to accelerate building projects? Larger sites have so many "Planning Conditions" attached which need to be discharged and which must take a huge amount of planning officer time. Many local people forget they benefitted from earlier development, want no change and quote lack of doctors, school spaces, infrastructure as reasons to object and delay much needed projects	Agreement 16 commits the Authorities to a range of measures designed to improve delivery rates and the Authorities are collectively considering what additional measures may be desirable. If further cross boundary agreements are necessary this will be included as part of the on going review of the Framework.	Further delivery based agreements to be considered following completion of the work currently being undertaken by the Delivery Group.
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited understands its integral role in housing delivery for the Central Norfolk Housing Market Area and to meet specific requirements in the existing and emerging Breckland Development Plan. The application for the SUE (up to 4,000 new homes) was submitted in July 2017 and consent is anticipated by spring 2018. Housing development at the SUE will be brought forward in response to the housing market/need. Given the size of the site, the housing delivery will take place over a number of years. It is expected that the first occupations will take place in 2020. At its peak, the indicative housing trajectory suggest up to 200 housing per year may be built. The site is anticipated to be completed by 2044, although this will be dependant up on factors such as the housing market, number of outlets on site etc. Full regard has been given to strategic infrastructure requirements needed to support the development. These will be implemented to align with housing delivery. For instance, the Link Road between London Road and the B1077 Attleborough Road and new footbridge across the railway will be delivered prior to the completion of 1200 dwellings on site (although the road could be delivered sooner if public funding is secured). Other supporting infrastructure such as schools will be delivered at appropriate trigger points. The provisions will be included in the S106 legal agreement that will accompany the SUE consent.	Noted. The issues raised are matters for consideration as part of the Breckland Local Plan	No change to NSF

BHLF-3C85-CACC-D	South Norfolk Council	Housing delivery – chapter 6.6 It is understood that further work is in progress to better enable the councils to understand how they could better enable the quicker delivery of housing on allocated and permitted sites. The measures and options included in this section are therefore sensible, but the Council believes that there could be stronger commitments to assisting in unlocking key housing sites. It has become increasingly apparent that few larger sites are coming forward as quickly as is desirable, and the use of Local Delivery Vehicles to assist in forward-funding infrastructure to de-risk sites is likely to become increasingly important in the next few years. The NSF will need to reflect other emerging information and evidence in this area, such as the enhanced powers of compulsory purchase announced last week by the Government.☒ On a similar matter, several Norfolk councils (including South Norfolk Council) routinely reduce the “standard” implementation periods (from three years to two years) for any permissions which are granted, at least in part, due to a lack of 5-year housing land supply. The Council believes that the NSF would be strengthened if all the authorities committed to do this through an additional Agreement, and that this would help speed up the delivery of such sites. ☒	Noted and Agreed. Further delivery measures are being considered. The recommendation that Agreement 16 is amended to include shorter 2 year implementation conditions for larger scale growth (100 dwellings plus) has been considered but as some authorities are not willing to sign up to this it cannot be included in the NSF.	No change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	Where public funding is available it should be used to help support new development and improve the viability of strategic development schemes which generally require considerable upfront investment in infrastructure before substantial housing growth can be delivered.	Noted and agreed	No change to NSF
BHLF-3C85-CA6A-X	BA	12) Top of page 35. First sentence talks about ‘12 of which arise from Norfolk’. I do not understand this. Should that be 213 arise from Norfolk?	Noted	Add revised text above table - The total OAN in the Broads Authority Executive Area between 2015 and 2036 is 286 dwellings (approx. 14 per year). In the Central Norfolk SHMA these figures are broken down between the overlapping Districts as follows:
ANON-3C85-CA62-F	Resident	How will building more houses contribute to "reducing the demand for and use of water and other natural resources"?☒ ☒ We can reduce the need to build new houses by taking measures to restrict ownership of multiple houses, especially where these are empty for much of the year. There should be financial penalties for people who own houses that are empty for the majority of the time.	Reducing the demand for water and other natural resources is intended to be delivered through the construction of more efficient homes incorporating specific measures to 'minimise' water use. A new agreement to adopt a common water efficiency standard should be added to the framework. The use of a property as a second home does not require planning permissions and is a matter outside of the control of planning departments.	No further change to NSF
ANON-3C85-CA6C-Z	EA	we acknowledge the need to increase development in Norfolk and the 12.7% projected increase in population of the county. This will have environmental impacts, these could include increased flood risk, pollution, stress on water resources and quality and loss of habitats. We are willing to work with councils to address these issues	Noted and welcome the support	No change to NSF
ANON-3C85-CA87-P	Resident	The continued drive to provide more housing come what may is directly opposed to the desired aim to be caring of the Environment in section 7. This coupled with a lack of infrastructure and an acknowledged underdevelopment of this, IF ANY just adds to the Environmental burden. A new home owner in more rural locations has to drive to shop , get to school on poorly maintained roads. ☒ A lot of modern estates are clearly unsustainable even though they pretend not to be so and the desire for LA's to get any income, which includes the News Home initiative BUNG and rate revenue means thet are complicit with the rape of the countryside	Planning authorities are required to prepare plans which positively provide for development needs	No change to NSF
ANON-3C85-CA8T-K	Hockering Parish Council	Hockering has been severely blighted by unsuitable housing developments approved due to the supposedly lack of a 5-year land supply. This is destroying our rural nature and causing damage to ancient hedges and green fields.☒ Consideration has not been given to an overall view of the cost to the village of all these developments. Councils need to see each development in the light of what has gone before - not as an individual application. The approving of a number of developments without regard for what is already being built has led to a dangerous situation with regard to the main highway - Heath Road. This is all due to councils omitting to view the area as a whole and in not looking carefully at the area that they are blighting.☒ This is of serious concern to all parishioners. Every application has been objected to by the parish but these views have not been upheld.	Matter for local plans to address	No change to NSF

ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	1 Government has said that the housing market is broken and that it intends to fix it. We await its plans. It is welcome that the NSF commits local authorities to apply greater 'science' to the manner in which housing need is assessed and provided for. 2 The problem lies with a combination of the volume of houses being built and the way the 'affordable housing' market. Building more homes is essential and there is a considerable volume of new housing stock in the early stages of planning in West Norfolk. 3 This focuses the issue to the way affordable housing is defined and provided for. The population forecasts (section 4) indicate what will be a growing shortage of working aged people in West Norfolk over the 20 year plan period, whilst the demand for labour will inevitably increase. Whilst post-Brexit the agricultural industry will become more capital and less labour intensive (that is already starting to happen) care for the elderly and provision of services for the tourist industry need labour, and are both low paid sectors. West Norfolk will therefore continue as a low pay economy and it is essential that housing provision clearly takes the particular needs of this area into account. The NSF requires some rebalancing of wording in this respect. 4 The fact that West Norfolk's working population will be increasingly low waged has implications for the service and retail sectors. That does not mean, however, they do not aspire to the same things as higher paid workers, and that includes owning their own home. A sufficient stock of decent, modern, affordable housing is therefore essential but and the NSF must address this. However it must also address, but does not, interventions in the housing market to ensure that affordable houses are not simply snapped up by wealthier people (especially whilst interest rates remain at a historic long term low) and therefore perpetuate the shortcomings of the rental market.	Noted and Agreed. Explanatory text of draft 6.4 already notes the significance of affordable housing issues and the scale of the challenge faced county wide. Comments made are largely accepted and it is considered that these are best addressed by further text being introduced into this section stressing the importance to the economy of maintaining a good supply of affordable homes for those of working age.	Further text introduced into this section stressing the importance to the economy of maintaining a good supply of affordable homes for those of working age
BHLF-3C85-CA3J-4	The Somerleyton Estate	Comments about Section 6 – Housing In Section 6.4 ‘Type of Homes’ a range of home types are set out to provide ‘critical’ guidance on tenure across the Norfolk local authorities. The Somerleyton Estate believe that a key type of home, being picked up by many local planning authorities elsewhere in the country (Tendring, Staffordshire and Stevenage to name a few), is aspirational housing. Described in the emerging Tendring local plan currently as (our emphasis): “Extensive public consultation has indicated that local people would support the development of ‘Aspirational Housing’ i.e. homes that are more spacious, with larger gardens, more vegetation and more parking space than most of the new homes that have been built in recent years. National housing density restrictions over the last 15 years prevented many properties of this nature being built; however, the new National Planning Policy Framework allows more flexibility for Councils to support housing developments of a size and type that better reflects local characteristics and the economic priorities of the Council. Being a district that is predominantly rural in character, lower density housing development is generally more in keeping with the fabric of Tendring’s towns and villages. In addition, the Council’s Strategic Housing Market Assessment suggests that around one fifth of the demand for housing for purchase on the open market is for larger dwellings of 4 or more bedrooms and that the proportion of larger properties in the higher Council Tax bands in Tendring is much lower than the regional average. The strategic priorities of this Local Plan focus heavily on the need to deliver economic growth, tackle unemployment and deprivation and improve the long-term prospects of future generations. Alongside measures to attract businesses, rejuvenate town centres and create more jobs, delivering the right mix of housing is critical to achieve all of these objectives. By delivering a high proportion of ‘Aspirational Housing’ within the mix of new homes over the 10-year plan period, the district can go some way to reversing the economic decline of the last 40 years by: • Providing attractive high-quality homes that ambitious young people growing up in our area can aspire to live in and stay close to their family and enjoy high quality employment without feeling they have to move away from the area to reach their full potential; • Encouraging high-earners and people with entrepreneurial spirit to live in the district who will have disposable income to spend in the local economy and who have the potential to invest in local business opportunities; • Reversing the unfair perception amongst some people and businesses that Tendring is simply a retirement area, which has been a barrier to business investment; and • Increasing the value of existing property in the district to the benefit of local residents and their children and, over time, reducing the rate of unsustainable inward migration that has resulted in part from cheaper property prices in the district’s coastal towns and from growth in the	Space standards are a local plan issue - each authority to decide if they wish to adopt standards.	No change to NSF
ANON-3C85-CA6Q-E	Resident	observation; The "agreement 14" is key to ensuring the housing needs are met.	Noted	No change to NSF

ANON-3C85-CA61-E	Define Planning & Design Ltd	As noted from Section 3, the HMA boundaries do not reflect the travel to work areas and therefore cross boundary influences should be taken into account. Given the emphasis of the framework on managing the supply of housing to match employment growth, the TTWA relationship is significant to the distribution of housing currently and likely to continue to be in future. The strategic objective to ensure a sustainable pattern of development by integrating homes, jobs and other key day-to-day services is fully supported and is reflected in the historic and future role of market towns within a rural hinterland. The delivery of associated infrastructure is critical to this approach. In order to unlock development, Local Authorities must be required to support the delivery of road, technology and green infrastructure in growth locations, and should seek to maximise the potential use of funding sources such as the Housing Infrastructure Fund. In terms of addressing housing needs, whilst it is agreed that the County must provide for an appropriate mix of housetypes and tenures to meet the full identified need for new homes, a flexible approach needs to be taken by Local Authorities to ensure that potential changes in demand for housing due to employment growth can be readily accounted for. The NPPF also highlights that demand as well as need must be considered in the determination of an appropriate housing mix. As reflected in response to Section 4, the availability and suitability of land to support strategic housing development at Fakenham, proposes that the town and North Norfolk District will play a significant role in meeting the growth aspirations for the County.	The definition of Housing Market area is a matter addressed in the Strategic Housing Market Assessments which cover Norfolk which take into account and explain the significance of Travel to work areas and the relationship between housing and employment.	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	We support the core objectives set out in the Framework, but recommend that a strategic approach is taken to meeting these requirements. The requirement of 4,000 homes per annum between 2015 and 2036 is not easy to attain and already the Councils have fallen behind this requirement, leading to an increase to 4,900 per annum. Although the Framework appears confident that rates will increase to the required levels, there is little evidence to support this. It is also likely that a range of previously developed sites, although welcomed from a sequential analysis perspective, will bring forward difficult to develop sites. These may include contaminated areas, they may raise difficulties over different ownership and lease covenants, and are often in awkward locations. Therefore, many of these sites do not come forward as first choice development opportunities. In addition, these locations are often more expensive to build and cannot meet the desperately needed affordable housing provision. This problem will be exacerbated by the desire (which we support) to provide homes, which are of enhanced construction standards beyond the current Building Regulations to meet the legitimate needs of high energy efficiency, low carbon dependency and more frugal water usage. These requirements will further add to build costs on some sites which are already difficult to build on. Stating that there are consented sites is simply not sufficient, as consented schemes do not guarantee delivery as shown by existing housing completions and a growing affordable housing need. We are also aware of the critique by CPRE Norfolk of the disputes over housing needs and allocations where many of the points we make here are not being adequately considered. This continued failure against need and targets, will lead to an increasing affordability gap, as supply continues to dwindle. Yet housing demand will continue to grow, driven by the main economic centres and by the migration set out in the Framework. This will continue to impact adversely on local economies, particularly through a lack good quality accommodation for key local business, including agriculture. We note that the Framework recognises both the affordability gap along with a growing deficit in housing for specialist care and for older people. This creates a picture of under provision against targets with the two most vulnerable sectors of the community (the poor and the old) not having their needs met. Long term continuation of these inadequacies of unmet but burgeoning need can be harmful, particularly as older people are attracted to the County and many of our own young people would like to stay here also. This under provision and the weaknesses in the current approach has led the Framework to recommend an increase of housing provision to a buffer of 10% of OAN. This is allied with a requirement to allocate a range of sites, which will deliver sustainable development. It then refers to greater support for infrastructure to help delivery and be attractive to housebuilders. It states that there should be clear demonstration that such development can be delivered. The Framework refers to housing needs support being directed to urban extensions.	There is no evidence to suggest that a new garden village/town will be required in the County to deliver the required growth or that such a proposal would deliver sustainable development.	No change to NSF

ANON-3C85-CA3Y-K	Lanpro Services Ltd	It is our view that there is a danger of not dealing with the fundamental issues which provide the barriers to housing choices. Urban expansions, rural sites and previously developed land must play a role in meeting recognisable and commonly agreed housing requirements. Urban extensions, in the correct circumstances, can have a positive impact on existing communities through providing new green spaces funding environmental improvements, delivering new road infrastructure to ease congestion, sustaining services, facilities, wider community infrastructure and supporting business. However, in other circumstances, they can create poor and environmentally inappropriate development, which encourages the speculative house building model and provides a housing estate ‘bolt on’ approach, with homes located some way from central areas. We have already highlighted unsuitable issues that can arise with cramming new homes onto previously developed land. This is why we now advocate a planned new garden town as part of a strategic approach to housing delivery and economic growth within Norfolk. As advised previously this will provide greater certainty of delivery at the right time in the right places, and offering real options for community betterment. The benefits of adding a new community based on garden community principles can be summarised as: • A strategic County-wide approach can be taken; • A sequential site analysis can ensure that maximum benefit is derived from site selection, in terms of linkages with surrounding towns and villages, public transport and highway networks and existing business clusters; • The strategic site selection process will ensure that a site is chosen that has minimal impact on the surrounding landscape and local community; • It will facilitate a master planned approach to ensure that the development has a positive relationship with its surrounding context; • A site can be selected that will have minimal negative impact on local communities. • A quantum of development can be provided, which will offer higher levels of affordable housing, specialist and elderly housing, as part of a comprehensive approach to creating a new community; • Garden community principles can be applied, to provide land value capture, long term stewardship and collective community governance models, by way of a community trust, along the same lines as the original garden cities; • The evolution, design and governance can be undertaken by way of a community governance model; and • Either by way of a Garden Community Development Corporation or partnership/collaboration between local authorities and a community trust or lead developer, land can be secured, a business plan agreed and certainty of delivery of development, including infrastructure to both serve the site and surrounding context; and • A commitment to a mix of housing types which allows for low density and moderate density living where people of different incomes ages,	See above	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	delivering high quality, energy efficient homes in attractive living environments which make a positive contribution to the health and well-being of communities (insert) ‘and support Norfolk’s place competitiveness’. 6.1 states that in most districts delivery rates have fallen behind the plan targets. The PL&M Group propose that there is an urgent need for the reasons for the mismatch between numbers planned for an delivery to be investigated. Unless the causes of the planning permission overhang are properly diagnosed it is difficult to plan the next round of development in full knowledge of true supply/demand and the capacity of the housing market to deliver. The PL&M Group look forward to working with the Norfolk authorities to fully interrogate the causes of the permission overhang and under-delivery against housing targets. Equally, there is a need to evaluate why key strategic sites have not come forward and what aspects of the delivery model can be adapted to support volumes of delivery and a higher quality product - in line with the aims set out at the start of this document. If there is shown that the targets set represent an inflation of true demand, It should be made clear to DCLG that the pursuit of over ambitious housing targets is opening the County up to litigation and challenge leading to the allocation of the wrong homes in the wrong place in contradiction of the fundamental aim of the NPPF. The PL&M Group concur with the statement in the document that annualised targets are a 'blunt instrument'. The PL&M Group would welcome engagement with the NDF to discuss the Strategic Land & Infrastructure Investment Model which it is interrogating as a potential innovative approach to underpin housing market delivery, in terms of number, mixed use and quality. This model could potentially help to produce a more strategic and flexible response to the cycles of property market demand such that serviced and master-planned sites backed by a patient capital investment proposition could be in place to accommodate very substantial future growth - beyond the 5 year land supply and annual targets - with housing delivery rising to meet the demands of a given market in a given year. Collectively, the Authorities are committed to the delivery of energy efficient homes which minimise the inefficient use of scarce resources and each Local Plan will consider the desirability of requiring enhanced construction standards which go beyond the requirements of the current NationalBuilding Regulations. - this para is insufficient in its approach to promoting sustainable development in its focus on a fabric based approach. It is fundamental to achieving sustainable forms of development that the footprinting of settlement is made more efficient through the insistence by planning authorities on the inclusion of elements of mixed use and mixed tenure, and beneficial co-locations are taken into account - in order to create balanced communities where trip generation to service daily needs is reduced. See points on the older demographic and its occupational needs set out above. A key consideration that needs to be built into planning for	See below	No change to NSF

ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	The potential to develop extra-care apartments co-located with doctors surgeries eg within an urban block or upper part format should be considered as part of a mixed use neighbourhood proposition within the major urban extension currently being promoted. Building Growth has systematically interrogated barriers met by the industry in developing in Norfolk. the major barrier to delivery was recognised to be the capacity of and provision of infrastructure. The BG PL&M Group have been working with members to fully understand barriers to growth. We look forward to working with the NDF authorities to produce a coordinated and well informed response to supporting innovation in the market, informed by our members market experience. In particular we are interrogating the potential of the Strategic Land and Infrastructure Investment Model (SLiIM) to underpin market innovation to unlock large scale and stalled sites. Greater support with infrastructure planning in relation to large scale plans for urban expansion to increase confidence and reduce risks for the industry and make them more attractive for housebuilders to build out at quicker rates than in the past. (* we would like to discuss the SLiIM proposition in relation to this objective.) Increasing the number of housebuilders active in the Norfolk market (** the SLiIM model would underpin this and would open up the market to smaller scale indigenous housebuilders) and increased use of modular (offsite) (***)the use of offsite construction could prove problematic for Norfolk in a number of ways. First it could produce a product that is not compatible with the county's place competitiveness and could undermine its attractiveness to tourism; it could operate to tie up large amounts of capital which could otherwise grow jobs and skills locally; if this model were to take over from craft production of homes these skills and the flexibility of the local construction market could be quickly lost; if these homes were produced at long distance they will add to rather than decrease our carbon load; if they were produced abroad in low cost economies, this effect would be heightened and our housing supply could become the victim of increasing geo-political instability; there is a poor record of building defect amongst many modular solutions). Action to stimulate the SME’s in the construction sector to increase the number of firms capable of building on the scale of sites that typically result in 5-50 dwellings being provided; and ☑ Action to stimulate the self and custom build sector considerably Both of these objectives are served by the introduction of the SLiIM model of development.	Agreed that further work is required to understand the reasons for slow delivery and to identify what further interventions might be required to deliver planned growth. This work is on going and will be reflected in on going reviews of the NSF	No change to NSF
BHLF-3C85-CAC8-2	Suffolk County Council	6.3 Housing☑ It is noted that the Norfolk local authorities are intending to deliver at least Objectively Assessed Need, consistent with national planning policy. The local authorities from both counties will have to work with the New Anglia LEP to relate their growth levels to the support that the LEP can give in achieving these targets.☑ 6.4 Types of homes☑ There is reference to the quantification of the needs of gypsies and travellers. It is likely that there will be the need to have engagement between some Norfolk and Suffolk districts where such needs overlap.☑ 6.6 Delivering Housing Growth☑ This section identifies the need for to increase the number of people entering the construction sector, noting the probable impact of Sizewell C construction in Suffolk. The Suffolk LAs and training sectors recognise the concerns here and are working to provide means by which these impacts can be mitigated. There is a joint approach being developed across Norfolk and Suffolk by way of a Construction Sector Skills Plan, led by the LEP’s Building Growth Group	Noted and agreed	No change to NSF

BHLF-3C85-CACM-Q	Savills	Objection is also raised to the conservative approach to housing provision. Although Section 6.1 acknowledges the responsibility to meet both the market demand for new housing and addressing the need for homes, this is not reflected in the Strategic Housing Objectives . It is considered that the quantity of housing growth should include but not be limited to addressing the need identified, and the Council should allow for more flexibility around provision. We therefore suggest the wording for the first bullet within the listed Strategic Housing Objectives (p33) be re-phrased to read: “Providing for the quantity of housing growth which will support necessary to drive the economic prospects of the County and address in full the identified need for new homes.” Section 6.4 – Type of Homes Support is given for the overall objective of Agreement 14 and specific support is expressed to the Council’s reference to student housing and the OAN: “The Central Norfolk Strategic Housing Market Assessment concludes that based on historical trend the student population in and around Norwich is likely to grow by around 420 students per year. The SHMA assumes that this student population will live in dwellings and this need is added to the OAN requirement for new homes”. This approach is considered to be entirely appropriate. Objection is, however, raised in that this approach has not been applied to the growing needs of the elderly and the specialist accommodation they require. It is considered that applying the same approach to provision for the elderly as is applied to the need for student housing (i.e. estimating the additonal need and adding this to the OAN), would create a more accurate reflection of the needs for specialist accommodation and increase the likelihood that this will be delivered. We also note that that no reference has been made to the need for ‘service families’ in Agreement 14, despite the number of military bases in Norfolk (e.g. RAF Marham). Section 6.5 – Capacity and Distribution The standard Norfolk methodology referenced in Agreement 15 has not been attached to the draft document and will, nonetheless, be superseded by the Government’s national methodology for calculating housing need. We would welcome the opportunity to comment on a revised methodology. Section 6.6 – Delivering Housing Growth Support is given to the first bullet point of Agreement 16 (p42), which seeks to bring forward more housing land than the minimum required by the NPPF (the 5% buffer required in NPPF para. 47).	The approach to housing targets is not considered to be conservative. It is an evidence based approach which identifies and seeks to address needs, includes ambitious uplifts for employment in central Norfolk and incorporates delivery buffers. There is no evidence based requirements for further uplifts. Agreements are written as minimum requirements and allow for authorities to respond to Local issues via the preparation of individual Local Plans. The needs of the elderly are included within the OAN assessments and do not require further uplifts. The standard methodology referred to in Agreement 15 relates to housing land capacity studies and is not related to the assessment of housing need which is a separate matter. The authorities consider that a clearer indication in relation to scheme delivery is essential given the delays which have occurred in recent years.	No change to NSF
BHLF-3C85-CACV-Z	Gladman	Agreement 10 – Housing needs and Supply Whilst this consultation does not set out the level of housing needs being proposed as these are to be dealt with through the emerging Local Plans process, Gladman have nonetheless considered the OAN prepared for the Central Norfolk HMA and are concerned that the assessment does not correctly identify a Framework and PPG compliant assessment of housing need. Gladman has commissioned Lichfields to undertake a critique of the HMA’s latest assessment of housing needs (see appendix 1) and believe that this consultation provides the forum to voice these concerns so that the authorities in the HMA can consider this evidence and update its OAN prior to progressing Local Plans based on incorrect assumptions. For brevity, the Lichfield report identifies a number of significant shortcomings. These include: The failure to evidence that the scale of market signals uplift proposed could be expected to improve affordability. The Lichfield analysis supports the need for a higher uplift, and based on a whole range of approaches concludes that an uplift for the HMA of 25% could be expected to improve affordability. - Failing to include the needs associated with the City Deal within OAN assessment, despite this being an approach that the SHMA previously advocated. - The significant under-estimation of the scale of affordable housing needs by using an approach which does not follow the stages as set out in the PPG, and uses the criteria of housing benefit which is not recognised in either national policy or practice guidance. Accordingly, the assessment fails to appropriately assess all households which are not able to afford market housing. The Central Norfolk SHMA also inherently assumes the continued role of the Private Rented Sector (PRS), an approach which has been rejected by Inspectors and does not fall within the Framework’s definition of affordable housing. The Central Norfolk authorities should consider the contents of the OAN critique and undertake the necessary work to ensure a NPPF/PPG compliant assessment of need is undertaken to inform the housing policies contained in each of the Local Plans currently being progressed. Furthermore, the HMA should consider the implications of the proposed changes to the current methodology for calculating OAN. Whilst the standardised OAN methodology is currently subject to consultation, we consider this will likely have implications on plan preparing across the HMA. Indeed, the methodology (as currently proposed) would appear to generate a housing need figure in excess of the SHMA’s OAN, and the requirement including the City Deal, at just over 3,200 dwellings per annum. Given current plan progression across Central Norfolk, this methodology would likely apply to most authorities if adopted. Agreement 16 – 10% buffer Notwithstanding the comments made on housing needs above, Gladman consider that the proposed buffer equal to not less than 10% of the OAN requirement should be applied is a positive approach to plan making. However, we would question the basis on which the 10% figure has	The representation essentially raises two issues. The first is a criticism of the approach taken towards the preparation of SHMAs which underpin the agreements with the NSF on housing need. As these agreements are based on three separate SHMAs it is considered that this level of detailed technical analysis is considered by each of the groupings which produced the relevant SHMAs and no adjustment should be made to the NSF until this work has been completed. It should also be noted that the publication of the draft standard methodology for calculation OAN may render detailed work in response to this representation unnecessary in some cases. The second issue that the buffer of 10% listed in agreement 16 is inadequate and a higher buffer of 20% should be preferred. This representation cites inspectors recommendations in the cases of Redcar and Cleveland and Stratford upon Avon local plans. Clearly these are only two examples and there is no standard buffer that exists.	Detailed comments on the SHMAs to be sent to relevant authorities for consideration. No change to agreement 16 considered necessary.

BHLF-3C85-CACB-C	Hopkins Homes	Agreement 10 - When determining their respective Local Plan housing targets each authority, working together where desirable, will aim to deliver at least Objectively Assessed Need as identified in the most up to date evidence (Table 8). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036. Summary: Hopkins Homes Ltd supports Agreement 10 that each Local Planning Authority should meet at least its own Objectively Assessed Need. However recent evidence and guidance indicates there is a significant housing need in the Greater Norwich Area that the emerging Greater Norwich Local Plan (GNLP) will need to address. The persistent patterns of under delivery in the GNLP area and an over reliance on large strategic allocations in the urban area does not provide a positive framework to plan for future needs. It is suggested that there is an availability of unconstrained land at Wroxham which can assist in meeting this need in a highly sustainable manner and play a complimentary role to the employment growth aspirations of the Greater Norwich Area. The Strategic Framework should therefore include measures to encourage emerging Local Plans to significantly boost housing supply but also recognise the role that settlements near to the main urban areas can play in boosting supply. The evidence base produced in support of the emerging GNLP, demonstrates that there is a significant need to be addressed. The SHMA estimates that the need for the GNLP area is 39,486 in the period 2015-2036 (1,880 dwellings per annum). Taking into account completions (1,782) and commitments (36,522) the Councils feel that new allocations for around 8,900 dwellings are needed. Whilst spatial options are being considered and will form the basis of a forthcoming Regulation 18 consultation, the GNLP Board has estimated that around 4,900 homes might be delivered on new allocations across the GNLP area (including 1,000 homes in towns and key service villages, a tier which includes Wroxham). Evidence suggests that there is significant upward pressure on housing need which the GNLP will need to address beyond the OAN. The following guidance highlights that a more positive framework for the delivery of much needed homes should to be considered to meet the significant needs across all parts of the GNLP area, including in Broadland: The Government’s current consultation on further measures set out in the housing white paper to boost housing supply in England suggests a standardised approach to calculating housing needs. The standard methodology for calculating housing needs ‘Indicative assessment of housing need based on proposed formula, 2016 to 2026’ indicates that the projected need in Broadland is significantly greater than is identified in the Central Norfolk SHMA (summarised in Table 8). This indicates that rather than a need of at least 389 dwellings per annum in Broadland, the annual needs is much greater and is in fact 528 dwellings per annum. Using a plan period to 2036 as agreed through the GNLP and Norfolk Strategic Framework, this would equate to need of 10,560 dwellings in Broadland, therefore significantly above the	Housing distribution a matter for local plans to consider	No change to NSF
BHLF-3C85-CAC2-V	Albanwise Ltd	Agreement 10 - When determining their respective Local Plan housing targets each authority, working together where desirable, will aim to deliver at least Objectively Assessed Need as identified in the most up to date evidence (Table 8). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036. Summary: Albanwise Ltd agrees that each Local Planning Authority should meet its own Objectively Assessed. It is also suggested that there is an availability of unconstrained land at Downham Market which can assist in meeting this need in a highly sustainable manner. The persistent patterns of under delivery in King’s Lynn and West Norfolk, and an over reliance on large strategic allocations in the King’s Lynn which are environmentally constrained does not provide a positive framework to plan for future needs. It is suggested that there is an availability of unconstrained land at Downham Market which can assist in meeting this need in a highly sustainable manner. The Strategic Framework should therefore include measures to encourage emerging Local Plans to significantly boost housing supply but also recognise the role that settlements such as Downham Market can play in boosting supply. The SMHA update from 2015 identified that to meet the full objectively assessed need (710 dwellings per annum) 14,200 homes will need to be delivered over the period 2016- 2036. This was reviewed in August 2016 and indicated that the need may be nearer 670 dpa or 13,400 homes. The Council is embarking on a Local Plan review to find land for additional homes responding to the latest SMHA evidence. The previous approach in the Core Strategy placed most growth at King’s Lynn as the main centre in the Borough to assist in regeneration needs whilst limiting growth at Downham Market, despite identifying it as one of the most sustainable and deliverable locations. The strategy requires fundamental review to recognise the positive role that Downham Market can play in meeting growth needs sustainably. A strategy focussed on King’s Lynn should be avoided over risks of deliverability over the full Plan Period due to a number of environmental constraints and concerns about the strength of the housing market. The approach would not accord with the emphasis of NPPF to provide a positive strategy and boost significantly the supply of housing. To ensure that the emerging Local Plan is found sound the Council should focus growth on locations with significant areas of land available free of strategic constraints which can deliver the requisite need, such as Downham Market. The current Local Plan clearly sees this as the most sustainable settlement after King’s Lynn. A Spatial Strategy giving greater weighting to Downham Market would be consistent with the call to significantly boost housing delivery as required by paragraph 47 of NPPF and would also prevent development in unsustainable locations as might be delivered through options which encourage a dispersal of development around less sustainable locations. As the second largest settlement in the Borough with available land free of significant constraints, Downham Market has the greatest potential to meet the Borough’s development needs and effectively maintain a supply of housing. This will provide a more effective planning policy basis in line with the principles of NPPF rather than	This response essentially raises two issues. The first is that it would be preferable to have a different settlement strategy for west Norfolk that the one currently emerging through the local Plan which paces a greater emphasis on Downham Market rather than King's Lynn in meeting housing needs. This is considered to be a matter for KLWN to address through the local plan and not an issues that should be resolved through the NSF. The second issue is that a 20% buffer should be applied in agreement 16 instead of 10%. There is no standard buffer that exists .	No change to NSF

BHLF-3C85-CACG-H	Persimmon homes	Section 6 - Housing (Agreements 10-17)¶ ¶ Persimmon Homes supports the requirement for Local Plans to deliver ‘at least’ Objectively Assessed Need housing numbers (Agreement 10). However comment/judgement on the figures is reserved until the standard OAN methodology has been applied and figures published. The consultation document suggests that should meeting the OAN requirement lead to ‘unsustainable’ development then other authorities would accommodate the need. The intention of this statement is not clear as it does not appear to be a sustainable approach and could lead to increases in the need to travel, if it is accepted that it will be a fine balance weighing up the different aspects of sustainability.¶ Persimmon Homes are generally supportive of the requirement for a proportion of the Broads Authority housing needs to be met with the Broads Authority area with the main housing needs being met in adjacent Districts (Agreements 11-12), although there is still the consideration of increasing the need to travel.~ Suitable adjacent growth locations should have good connectivity to the Broads Authority area¶ ¶ Persimmon Homes supports the aim for ‘Greater Norwich to meet its combined OAN plus an additional 5,228 homes for meet the needs arising from the City Deal (Agreement 13).’¶ ¶ Persimmon Homes suggests that planning/monitoring for specialist accommodation needs to be separate from non-specialist market/affordable housing; and should not be used to offset targets for market/affordable housing (Agreement 14),¶ ¶ Persimmon Homes agrees that wherever possible all Norfolk LPAs should use standard methodologies for housing and employment availability assessments (Agreement 15) but should¶ allow others to comment/critically appraise the methodologies at regular review periods.¶ ¶ Persimmon Homes notes the requirement for the quantity of homes to be planned should include a buffer above the OAN requirement (Agreement 16). However, for some Districts, where the housing needs are more acute and not currently being met, this buffer should be nearer 20%. Also, LPAs should take advice from developers on the size of sites that should be allocated. The requirements for larger sites to show evidence of delivery is supported. Persimmon is proud of its track record of delivery, which should be given due consideration alongside technical evidence of a sites suitability.¶ However, the level of evidence required for submission should be proportionate to the stage in the planning process so as not to make the site promotion process unnecessarily costly. Also, such an approach would need to be applied	Agreement 10 and the 'potential' for redistribution of growth reflects national guidance which indicates that where unsustainable growth would occur agreement should be reached with neighbouring authorities. The risks of unsustainable commuting would need to be considered as part of this process and would be a matter for each Local Plan to consider should such a scenario arise. It is agreed that the needs of the elderly for specialist types of accommodation need to be separately quantified and planned for. This is reflected in the wording of Agreement 14.	No change to NSF
BHLF-3C85-CA3U-F	TETLOW KING PLANNING	We represent Rentplus, a company providing an innovative affordable housing model that delivers affordably rented homes to buy (a ‘rent to buy’ model) for people who aspire to own their own home, but are currently unable to save for a mortgage deposit. ¶ Introduction ¶ ¶ Enclosed with this consultation response is an Affordable Housing Statement by Tetlow King Planning setting out the details of the rent to buy model which is being delivered in England with support from Government. It describes the model’s compliance with the NPPF definition of affordable housing and how this should be incorporated into local plans to boost supply and meet local housing needs. We ask that this be read alongside our representation so that the Councils approaches to negotiating housing take into account this innovative model which has the capacity to improve delivery and meet high levels of local housing need and aspirations of home ownership across the County. ¶ ¶ Rentplus is delivering rent to buy housing that meets local peoples’ needs and aspirations in partnership with local planning authorities and Registered Providers (further details of completed and forthcoming schemes can be viewed on their website www.rentplus-uk.com). The rent to buy homes are allocated as with other affordable housing tenures through the local choice based lettings scheme and targeted lettings plans. The Rentplus model provides homes at an affordable rent for those expecting to purchase in 5, 10, 15 or 20 years, with a 10% gifted deposit to assist purchase. The purpose of our representation is to seek more flexible and pragmatic local planning policies to help greater numbers of local families move out of inappropriate housing. ¶ ¶ It is notable that one recently completed Rentplus scheme was 30% filled by households previously living in social and affordable rented properties, releasing those homes for families in need. Rentplus schemes also enable people to leave expensive private rented sector accommodation and parents’ homes, gaining independence and security of tenure. With such a significant need for affordable home ownership options across the County, it is clear that there is a role for rent to buy housing to play in meeting local need, and also in enabling access to home ownership, a key aim of this Government. ¶ ¶ We note Agreement 1, which is an important starting point for each of the authorities to consider, and the June 2017 SHMA Update. However, in light of this month’s consultation from the Government on the potential changes to assessing housing need we note that there may be a need in the short term for a review of local housing needs. The Government’s consultation documents suggest there may be a	Noted. Individual authorities will determine tenure types and mixes of affordable homes within there Local Plans.	No change to NSF

BHLF-3C85-CA3U-F	TETLOW KING PLANNING	Agreement 2 is also supported, as it provides a very clear ambition to meet local housing needs. Delivering housing that meets the full spectrum of housing needs requires developments to also reflect differing aspirations, as many people seek to own their own home. The Government’s intention for all major developments to be delivered with at least 10% affordable home ownership options will be met not only with the now traditionally accepted intermediate models, but also rent to buy. We note here that our response to the Housing White Paper earlier this year emphasised that rent to buy is not an intermediate model, but a hybrid that requires separate definition, as with a number of the other models set out in that consultation (at Box 4). It is important to note that Alok Sharma, Housing Minister, recently confirmed in the House of Commons that the new definition of affordable housing to be included in the next iteration of the NPPF is to include rent to buy. The SHMA update references the potential changes to the definition of affordable housing, and though this does not directlyreference rent to buy, it is right in acknowledging that many potential owner occupiers struggle to save a sufficient mortgage deposit to purchase a home. Rentplus seeks to bridge this gap by providingfamilies with a home that is rented at an affordable level for a set period to enable savings to be built up, before purchasing the home outright. We agree with Agreement 10 as this aims to deliver the objectively assessed needs of each of the individual local planning authority areas; this approach sends a clear message that development should aim to meet local housing needs and properly develop mixed and balanced communities across the County. Noting the statement that the County is aiming to provide suitable homes for those unable to afford market prices and rents, it may be suitable for representatives of Rentplus to meet with strategic planning and housing officers of each of the local councils to discuss how a partnership could assist in this aim. As Rentplus works in partnership with locally active Registered Providers of affordable housing developments are brought forward with considerable local knowledge and experience. We would like to be consulted on further stages of the Framework and other plan publications by each of the Councils, by email only to consultation@tetlow-king.co.uk. Please ensure that Rentplus is retained on the consultation database, with Tetlow King Planning listed as their agents.	Noted. Individual authorities will determine tenure types and mixes of affordable homes within there Local Plans.	No change to NSF
BHLF-3C85-CACV-Z	Gladman	The Duty to Cooperate (DtC) is a legal requirement established through Section 33(A) of the planning andCompulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planningauthorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on crossboundarystrategic issues through the process of Plan preparation. As demonstrated through the outcome of the2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of a Local Plan. This mattercannot be rectified through modifications. The Planning Practice Guidance (PPG) provides guidance upon compliance with the DtC which makes clear thatlocal planning authorities should explore all available options of delivering the planning strategy within their ownarea, and should approach other authorities with whom it would be sensible to seek to work to deliver the planningstrategy1. This should be achieved through co-operation between local planning authorities, county councils andother public bodies to produce effective policies relating to strategic cross boundary matters2.2 Whilst there is no definitive list of actions that constitutes effective cooperation under the duty, cooperation shouldproduce effective policies relating to cross boundary matters and may involve local planning authorities and publicbodies entering into agreements on joint approaches, which may involve joint evidence and strategies to define the scope of Local Plans across the Housing Market Area (HMA).2 It is clear that the Central Norfolk HMA is affected by the influence of a dynamic market area with an emphasis on meeting the HMA’s economic growth ambitions. It is therefore important that the authorities contained in theHMA do not lose sight of this objective and the that the DtC is a process of ongoing engagement and collaborationand that it is intended to produce effective policies on cross boundary strategic matters3. Accordingly, the Councilswill need to continue to engage and work with each other to satisfactorily address any cross boundary strategic issues.2 Central Norfolk Strategic Framework2 Any issues of unmet housing need arising from the relevant authorities in the HMA must be fully consideredthrough the preparation of Local Plans, working under the requirements of the DtC. To achieve this, it is vital thatthis matter is carefully explored through joint working with all local planning authorities within the HMA, togetherwith any other relevant local authorities that the HMA has a clear functional relationship with. Where necessary,a strong policy mechanism will be required within each Local Plan to demonstrate that unmet housing needsarising from any relevant authorities and those with a clear functional relationship will be met during the planperiod.2 The need to tackle any issues of unmet housing need through the plan making process was highlighted in an2	Comments are noted which appear to be broadly supportive of the preparation of the framework and the on-going commitment of the authorities to co-operate. The various Agreements (10,11 and 12) provide the framework which will allow for Local Plans to address all needs.	No change to NSF
ANON-3C85-CAX4-K	Parish Council	Successive governments have attempted to meet housing needs by over-allocating land. This has not worked. This Strategy does not address the question HOW those in housing need will get access to housing - it is merely aspirational and will not deal with the problem. Unless Government and local government address this issue housing target are meaningless.2 2 Builders will not build houses to stand empty or be sold at a lower price - they cherry pick. "Affordable housing" is not actually affordable to those in most need. Similarly the private rent sector is not affordable. Ample land is committed for immediate needs - the Strategy should examine why it is not being used to provide the housing needed.2 2 This Strategy should also analyse housing need in a way that demonstrates what measures, fiscal or otherwise, need to be in place give access to housing of the appropriate type in the appropriate location to meet needs related to social and economic policies. That's real planning!2 2	This point is noted and to some extent reflects a growing recognition from government that the housing market in the county is broken. This has been reflected in the Housing White Paper and more recent government announcements and it is expected that there will be further measures announced to address this in due course. It is recognised that delivery is challenging and that further work has been done collectively to suggest how local authorities may improve the ways they work on this matter. however, the local councils need to work within the current planning system and range of powers they are given by government.	This matter will need to be kept under review in the light of rapidly changing government guidance.

ANON-3C85-CAJG-R	Resident	The proposals fail to recognise that many properties in north Norfolk are no longer affordable for people living and working in north Norfolk. Many properties are empty much of the time. More suitable designed properties are needed for retired people and those only using the properties for holidays/weekends. There is a danger the housing stock will not be adequately maintained as people only use the properties as second homes.	The points made are noted but revised text in the document already addresses the issue of affordable housing and the impact on the economy that may result. In order to control the loss of existing residential stock to the second home or holiday let market local authorities would need further primary legislation to come forward.	Text addressing implications of affordable housing provision to be included. No further change needed.
ANON-3C85-CAJF-Q	Resident	1 It is clear that there has been insufficient building to meet housing need (total numbers and type of accommodation) in recent years and the push to rectify this is welcome and reassuring. 2 There is (nationally as well as locally) a failure to recognise that affordable homes are affordable for better-off people too, and that they buy them up to rent and, whilst the house building market has failed, so too has the rental market. Building more affordable homes without proper safeguards as to ownership concentration, therefore, simply adds to the medium to longer term problem. You fail to address this. 3 Throughout the narrative there is a failure to take account of the likely impact of Brexit. There is much emphasis on taking account of the particular housing needs of gypsies and travellers but not the needs of Eastern Europeans, working as they often do, in low paid agricultural work, sending large proportions of their earnings home to their families, and being reduced to living in squalid and poor housing. This impacts a much greater number than gypsies yet is swept aside as it is not politically correct to address the issue. That is the greatest failure of this section.	Work jointly commissioned by local authorities has highlighted potential delivery interventions and these are included in section 6 of the updated NSF. It is not possible at this stage to predicted the impacts of Brexit on housing needs and the labour market. Once this picture becomes clearer the NSF can be updated accordingly.	No change to NSF
ANON-3C85-CA3V-G	Resident	There is a tendency to place too much emphasis on large scale housing development. This results in an imbalance in supply - slanted towards flats, medium-sized houses for owner-occupation and housing association units, all in large concentrations. These types of development are very inflexible; and delivery can be very vulnerable to changes in market sentiment. There needs to be more encouragement of, and considered planning for, the conversion (often re-conversion) of redundant retail and other commercial buildings in market towns; there needs to be some modest provision for organic growth in all but the smallest villages - including to allow family and community support networks to survive, reducing the demand for care facilities; and there needs to be more provision of single-storey units (bungalows) suited to retirement. However, the need for the provision of social housing, rather than simply affordable housing, must be recognised. It is not simply that low-paid people cannot afford to buy; many people do not want to buy or are not (for a range of reasons) well-equipped to deal with the responsibilities of home ownership. these are not people needing to be in formally sheltered accommodation. But they are people who need to be able to rent decent homes, securely (so for their lifetime if they so wish) and from landlords driven by the recognition of their personal and social needs rather than simply a requirement to balance the books or secure a profit. And whilst we do not need ghettos, I feel we have now gone too far in the other direction, denying those who do not aspire to home ownership and the climbing of the greasy pole, the opportunity to live in social groupings with like-minded neighbours. We need, as part of an overall housing strategy, a robust policy for the delivery of socila housing.	These points are noted and this is addressed further in the delivery work highlighted in the updated section 6 of the NSF.	No change to NSF
BHLF-3C85-CA32-C	Norfolk County Council	A belated thank you for adding the Armed Forces Covenant to the NSPG agenda – it was a useful discussion and raised awareness of forthcoming housing issues particularly in the west of the county (which King’s Lynn were unaware of). There were mixed views on whether or not service family accommodation should receive a specific mention in Local Plans. Breckland said there were aware Robertson Barracks at Swanton Morley is marked for closure in 2031 and had not yet mentioned it in any documents. Others thought service families were included in the general population as part of the SHMA and did not need identifying as any different. Going forward, I think it would be helpful and set a good example (nationally) if the Norfolk Strategic Framework and District Local Plans made mention of the armed forces and the fact the MOD’s plans to alter how it provides service family accommodation will impact on residents in Norfolk.	Agreed. Text after Agreement 14 to include reference to armed forces.	Amend text after Agreement 14 to include reference to affordable homes, self build and armed forces accommodation.

BHLF-3C85-CAC1-U	Home Builders Federation	Housing needs and supply Whilst we cannot comment on the level of housing needs being proposed as these still have to be tested at examination we welcome the agreement that each local authority in Norfolk will seek to meet their own objectively assessed needs for housing, as required by national policy. However, should any authority not be able to meet its housing needs the strategy does not set out the mechanisms as to how needs will be apportioned between authorities. There should be a clear mechanism within strategy, that could be set out in each local plan, as to how unmet needs will be apportioned should any Council not be able to meet their own needs. We would also suggest that the statement in paragraph 6.3 that each Local Plan prepared in Norfolk will need to show how the OAN for each Housing Market Area is being met is reflected in “Agreement 10”. With regard to the supply of new homes the strategy states that each authority will produce a Land Availability Assessments to the standard Norfolk methodology. We would suggest that it would be more appropriate to prepare a single assessment for each Housing Market Area. This would not only be more transparent but ensure that the sustainability of the distribution of housing supply is considered across the HMA not on an authority by authority basis. Planning to deliver at least 10% over their OAN and allocate a range of different sized sites are further steps in the right direction and will support Council’s in having a more robust land supply. However, we would suggest that part 2 of Agreement 16 is expanded so that Council’s agree to allocate a minimum proportion of small sites that will support small and medium sized developers. Providing greater certainty for this sector of the house building industry is key to stimulating the growth of such house builders and we would suggest that consideration be given to the recommendations set out in “Reversing the decline in Small House Builders” published by the HBF earlier this year. Alongside allocating more small sites Councils could consider how they could speed up decision making and reduce documentation in order to reduce the costly delays that are a regular occurrence across the Country. Student housing Whilst we agree that there is a need to plan for the needs of students we consider essential that these needs are monitored separately to housing delivery and that this	Current evidence indicates that outside of the Greater Norwich area each authority will address its needs via the preparation of Local Plans and no further agreement in relation to the distribution of development will be required. This issue will be kept under review. The use of a standard methodology to assess land supply allows for supply to be considered at Housing Market Area level. As Local Plans are prepared to administrative boundaries it is important that land supply assessment adopt the same geography. The size of sites to be allocated and delivery/monitoring of student accommodation are matters best considered via the preparation of Local Plans.	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	As noted above, the economic benefits of villages such as Hoveton include their contribution to quality of life. While there might be a strong desire to increase development to the North and East of Norwich, Hoveton Parish Council believes that any such development should be sustainable, and should not have an adverse effect on the quality of life offered by the local community in which the new development is to be located. It therefore applauds the shared objective to ensure that “new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure”. Unfortunately, Hoveton Parish Council feels that, at present, the general local infrastructure is well below expected standards (please see the Council's comments on Section 7 for further information) and it shares the concerns of local residents that a growing population caused by overdevelopment will seriously impact on residents’ access to quality health care, education, and many other vital services, thereby impacting on the quality of life offered within the local community. Furthermore, it seems inevitable that too much development will seriously harm the rural character of the local area. Hoveton Parish Council feels the fragile coastal, Broad and rural environment must be retained if it is to contribute to a strong and valuable tourist industry.	The NSF does not seek to determine the location of growth. The matters raised are issues which will be considered as part of the preparation of North Norfolk's Local Plan.	No change to NSF
BHLF-3C85-CA3K-N	Hoveton Parish Council	As noted above, the economic benefits of villages such as Hoveton include their contribution to quality of life. While there might be a strong desire to increase development to the North and East of Norwich, Hoveton Parish Council believes that any such development should be sustainable, and should not have an adverse effect on the quality of life offered by the local community in which the new development is to be located. It therefore applauds the shared objective to ensure that “new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure”. Unfortunately, Hoveton Parish Council feels that, at present, the general local infrastructure is well below expected standards (please see the Council's comments on Section 7 for further information) and it shares the concerns of local residents that a growing population caused by overdevelopment will seriously impact on residents’ access to quality health care, education, and many other vital services, thereby impacting on the quality of life offered within the local community. Furthermore, it seems inevitable that too much development will seriously harm the rural character of the local area. Hoveton Parish Council feels the fragile coastal, Broad and rural environment must be retained if it is to contribute to a strong and valuable tourist industry.	Noted, housing distribution is a matter for local plans to consider	No change to NSF

BHLF-3C85-CAC7-1	Amstel Group Corp	The need to provide new homes is a key issue facing the area and indeed the country more widely, as the Government seeks to boost significantly the supply of housing. An appropriate balance needs to be struck between the need to provide new homes and other competing objectives, e.g. environmental considerations, heritage etc. The public benefit that new housing provides should be given great weight in decision making to reflect the importance of this need. On Thursday 14 September, the DCLG published its ‘Planning for the right homes in the right places’ consultation document. The consultation seeks to achieve a standardised methodology for assessing housing need. It suggests a three-step process to assessing housing need. As with existing practice, the DCLG’s household projections continue to be the starting point for assessing housing need. The second step involves an adjustment to take account of market signals. This adjustment is based on the affordability ratio between average house prices and average earnings, with a higher adjustment applied in areas with more acute affordability issues. (The proposed approach does not factor in jobs growth.) Finally, the model introduces a cap to limit any adjustment uplift. The cap would be 40% in areas with an up to date (post-NPPF) Local Plan. In areas with Plans older than five years, the uplift is capped at 40% above the projections or pre-NPPF requirement, whichever is higher. Alongside the consultation, DCLG published an indicative assessment of housing need 2016-2026, based on the proposed methodology. For North Norfolk, indicative data suggests the OAN would be 511 dwellings per annum. This is significantly higher than the 409 dwellings per annum that the latest SHMA (2017) suggests. We would expect the Framework and the Local Plans that fall under its remit to adopt and endorse the Government’s approach to calculating OAN. The Framework should also recognise that its authorities should endeavour to not only meet, but exceed, housing targets. The OAN represents the minimum level that housing that needs to be delivered.	Noted	No change to NSF
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Housing: Ashmanhaugh Parish Council engaged with NNDC on a suitable housing model for the Parish and has been very pleased with the subsequent housing allocation. The Council would like to recommend that NNDC's consultation approach is considered when implementing one methodology across the County. The message from the community of Ashmanhaugh was that people want to see a vibrant, growing village and there is an appetite for Ashmanhaugh to grow by about 10% in the next 20 years. This needs to be linear housing - filling in existing gaps in the road frontage with individual properties and within the existing 30mph zone of the Village. There should be some affordable housing available to buy, with priority for local families.	Noted.	No change to NSF
ANON-3C85-CAFT-1	Resident	It would be interesting to know how this sits with the localism act and the additional planning regs afforded to areas with a local plan themselves, especially where parish councils exist.	Can't respond to this point without knowing which part of the draft NSF the point relates to specifically	No change to NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	Use existing planning permission before issuing new ones	Noted and agreed. The authorities are considering what further measures may be appropriate to bring forward consented developments.	No change to NSF
BHLF-3C85-CA6K-8	Hunstanton & District Civic Society	I would wish to add under Section 6 Housing - That there is a major problem with the numbers of houses that have become second homes or holiday lets particularly along the coast of North Norfolk and also in West Norfolk. I suspect the same is the case in the Broads area. Many of the houses are shut up during the winter and the area becomes lifeless. This affects community life, the viability of schools, local shops and transport services. Second home ownership drives up house prices and precludes purchase by local people. There is a large deficit of 20 to 38 year olds from the area, they move out perhaps to go to further education, for employment opportunities or maybe to obtain accommodation that they can afford. Developers are targeting the second home market with large expensive houses that are not what is required by local people.	Noted. Planning authorities have no control over the occupation of existing dwellings as second homes. Individual Council can consider how new housing stock is occupied as part of their Local Plan preparation	Added text around controlling second homes
BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	The NSF echoes national policy objectives to ensure that sufficient homes of the right type, are built in the right location, noting that this means meeting the market demand for new housing, addressing housing need and also that homes which are built should be of the right type - having regard to needs of the existing and future population. Nowhere is there any mention of the north coast problems associated with the growth in second homes (second homes now outnumber principal homes in Holme and neighbouring villages in West Norfolk ie they represent >50% of the stock), the loss of modest dwellings to much grander replacement second homes and the impact on market prices. The related community problems are growing (affordability for resident buyers, empty / uncomfortable spaces for many months of the year, diminishing opportunities for down-sizers in their own villages, retirees wishing to buy into the market and reducing numbers of resident households). Surely this should be an issue for the NSF?	Noted. Planning authorities have no control over the occupation of existing dwellings as second homes. Individual Council can consider how new housing stock is occupied as part of their Local Plan preparation	Added text around controlling second homes

BHLF-3C85-CA3B-V	MP	I am writing in order to comment on the consultation draft of the Norfolk Strategic Framework, which has been prepared in order to improve outcomes for Norfolk and, by agreeing shared objectives, inform the preparation of future local plans. I welcome the wide-ranging nature of the Framework, which rightly focuses on infrastructure, housing and strategic economic development across Norfolk. However, I am concerned to note that this draft document makes only the most perfunctory mention of self-build and custom housebuilding, and seems to regard self-build as a type of dwelling rather than a mechanism for delivery at scale – which it is. The Self-Build and Custom Housebuilding Act 2015, as amended by the Housing and Planning Act 2016, places a legal requirement on Norfolk’s local planning authorities to keep a Register of demand for serviced plots from people both and to then meet that demand by consenting planning applications for serviced plots. Furthermore, all Norfolk’s local authorities and public bodies must have regard to these Registers when carrying out their planning, housing, land disposal and/or regeneration functions. These legal requirements are known as the Right to Build and apply, partly or wholly, to all relevant local authorities and public bodies in England. I would therefore like to see the Framework embed good practice in regard to the Right to Build, alongside an agreement between public bodies and local planning authorities to ensure that the discharge of the four functions listed above (planning, housing, land disposal and regeneration) has regard to the Registers, especially in terms of any land held by Norfolk’s public bodies and Norfolk County Council. The Right to Build Task Force, which is part of the National Custom and Self-Build Association (NaCSBA) advises local authorities in these areas and I would be pleased to arrange an introduction in my capacity as Ambassador for the Task Force.	NSF identifies that further work is needed around self-build. Agree, reference to self build to be added to NSF	Amend text after Agreement 14 to include reference to affordable homes, self build and armed forces accommodation.
ANON-3C85-CAXT-K	Woods Hardwick Planning Ltd	We would reinforce the requirement for the respective local plans to address historic shortfalls in the preparation of new plans so that previous and future housing needs are fully met. We support the wording of Agreement 10 which states that the aim will be to deliver at least the OAN figure identified for the respective authority. The plan acknowledges that there has been an under delivery of housing in recent years with the result being that the authorities are experiencing problems in maintaining a 5-year housing land supply as required by the NPPF. It is pleasing to note that the Norfolk Authorities have agreed to take a range of actions to improve housing delivery. The proposals within Agreement 16 are supported. The additional minimum 10% buffer over and above the OAN figure will build in flexibility to the supply to mitigate against some site not coming forward. Furthermore, the allocation of a range of sites is considered essential. Too much reliance can be placed on large strategic sites which take time to deliver and the allocation of small to medium sized sites is essential to maintain consistent delivery. Such sites are easier to bring forward.	Noted	No change to NSF
BHLF-3C85-CA3U-F	TETLOW KING PLANNING	We agree with Agreement 10 as this aims to deliver the objectively assessed needs of each of the individual local planning authority areas; this approach sends a clear message that development should aim to meet local housing needs and properly develop mixed and balanced communities across the County. Noting the statement that the County is aiming to provide suitable homes for those unable to afford market prices and rents, it may be suitable for representatives of Rentplus to meet with strategic planning and housing officers of each of the local councils to discuss how a partnership could assist in this aim. As Rentplus works in partnership with locally active Registered Providers of affordable housing developments are brought forward with considerable local knowledge and experience.	Noted	No change to NSF

INFRASTRUCTURE COMMENTS:

Response ID	Organisation	Comment	Officer Response	Action
BHLF-3C85-CA6A-X	Broads Authority	Agreement 17. There could be landscape impacts of such infrastructure which will need to be considered in protected areas of the County.	Agreed there could be landscaping issues in protected areas	Agreement 17 updated
BHLF-3C85-CA3J-4	The Somerleyton Estate	At the end of this section and under the sub-heading ‘Agreement 20’ the Somerleyton Estate request the following amendment to make the objective wider in its reach and to avoid a focus only on certain areas of the County at the expense of other key areas such as Fritton Lake: “Agreement 20: In recognition of: a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty Norfolk’s natural environment brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; and b) the pressure that development in Norfolk could place on these assets the Local Planning Authorities will work together to produce a GI Strategy for Norfolk by the end of 2017 which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.”	The same point was raised by Natural England and their wording has been used.	No further change to NSF
BHLF-3C85-CA6A-X	Broads Authority	Agreement 20. As written, the protection and enhancement of these assets relates only to the GI strategy. Is there merit in the Local Plans in general considering their impact on these assets so they are protected and where appropriate enhanced?	This is part of the normal local plan process and doesn't need referring to specifically within the NSF	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	Agreement 20 – add a bullet point (c)’and the importance of retaining ecological connections between habitats’ (e.g. to meet governmental targets such as Biodiversity 2020). This would be a facet of building in esilience and adaption to a changing climate for example	Agree, aim to strengthen ecological connections between habitats added to agreement	Agreement 20 updated
BHLF-3C85-CAE4-Z	North Norfolk District Council	Agreement 18-20: Agreed	Support noted	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	It could be considered implicit that ‘blue infrastructure’ is part of green infrastructure, but this section of the document seems to miss the opportunity to highlight the importance of the water network generally in relation to GI. Rivers and other water bodies do not seem to be identified on figure 11 or 12. Reference should be made to them and their importance to GI.	Agree to change	Add foot note, GI includes 'blue infrastructure' ie water environment - rivers, lakes, ponds etc.
BHLF-3C85-CA6D-1	Middleton Parish Council	The Council did note that a lot of the reports within the document appear to have been created before Brexit was agreed, therefore, the Council would like to see consideration given to the Brexit decision on the long term grown and development of Norfolk within the Framework.	It is not possible at this stage to predicted the impacts of Brexit on infrastructure provision.	No change to NSF
ANON-3C85-CAXS-J	Resident	Without fast broadband and higher mobile standards away from Norwich development and attracting a wide range of businesses and residents will not be achieved.	The NSF recognises how essential fast broadband is and will help to promote this further	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 7.5 - although Broadband availability and speed has improved, the patchy reception for mobile phones is a distinct handicap. As mobile phones are essential for food warnings to be effective, improved coverage should be a priority.	The NSF recognises this; whilst EE will be rolling out better coverage of 4G across rural Norfolk, all the operators need to do likewise. The Authorities are doing what they can, through the Agreement in section 7.5, to ensure that 5G coverage, when it comes, will offer complete coverage of Norfolk	No change to NSF
ANON-3C85-CAJF-Q	Resident	Broadband: the second largest urban centre in the county does not have access to Basic Broadband (although that is variously described as "less than" 2Mbps in the text and "minimum download speed" of 2Mbps in the key to the accompanying map. Either way this is a major deficiency with major impacts on local businesses that the Framework makes no recommendation or agreement to put right. There should be recognition in the Framework that satellite and WiFi technologies will also not work in many parts of the county, for example even for reasons of buildings being in Conservation Areas and this, too, the planning authorities should recognise and consider policy alterations to accommodate. Broadband: the document concludes that it is "less a strategic issue" and more of a "development management issue" that some areas do not have Superfast Broadband, and may not in new development areas. This is highly questionable, broadband is as much part of the mobility infrastructure as roads and rails, and it is totally unacceptable for the planning authorities to walk away from what will become an ever more important issue in the future in this way. This needs to be reconsidered. Mobile Telephony: Much the same applies as for broadband, and there is no apparent recognition that Next Generation Access (G5) will do anything to improve a currently very poor signal strength and availability in wide areas of the county away from Norwich.	The NSF, and the Norfolk authorities, do not have the power to <i>require</i> higher and more reliable broadband speeds and mobile signals, although clearly they are very strongly encouraged. The text will be adjusted slightly to reflect the fact that satellite and Wi-Fi broadband is, as pointed out, not always a practical solution in some parts of Norfolk. Through their Local Plans, the Norfolk authorities will do what they can to encourage better broadband connectivity	change para 2 (49) to say: "...satellite broadband, although it is recognised that there will be many parts of the county where these are not currently practicable. "
BHLF-3C85-CA69-P	Snettisham Parish Council	Agreement 17 – 5G coverage is irrelevant to most, as it will inevitably be focused in Norwich. This will merely exacerbate the problems with digital inequality within the County, where there are swathes of West Norfolk where even getting a mobile call through is problematical. Please can we have some consistency and balance?	5G will, for the reasons set out in the NSF, need to have near-complete coverage of Norfolk. The rollout of 5G is likely to be phased, but the councils will work to ensure that coverage is rolled out as quickly as possible, to minimise the potential for rural areas to suffer from delays	Amend para 6 of page 51 to say: "...early days of 5G), but the authorities will do all they can, through liaison with mobile providers, to ensure that rural areas of Norfolk get 5G at the same time as urban areas. "
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	3 Broadband: King's Lynn, as the second largest population and economic centre in the County, and classed as a sub-regional centre, does not have Basic Broadband according to the NSF map (although two different definitions of this are given). This is lamentable and the NSF must write robustly that it will insist that this is rectified soonest. 4 Broadband: the NSF opines that "this is less a strategic issue" and more a "development management issue", a statement with which we strongly and profoundly disagree. Providing acceptable broadband speeds is taken for granted in most areas of the UK, rural as well as urban, and whilst urban areas in Norfolk remain deficient, this should be considered as a strategic issue as failure to provide it, whilst competitor towns speed ahead, will leave West Norfolk as an economic backwater. This is not acceptable and the NSF must be rewritten in this regard. 5 Mobile connectivity: the NSF must be more robustly worded to provide local authorities with the basis to press for greater mobile connectivity included in G4 as well as G5 and more broadly across the county than just provision in the Norwich area.	The Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements in speed and reliability. The text will be re-worded slightly to clarify that broadband is an issue of strategic planning significance, but until emerging Local Plans are adopted, the rollout of high-speed broadband cannot be required through current Local Plan policies. For 5G mobile telephony to work effectively, it will need to have near-complete coverage of the whole of England. Whilst it is inevitable that it will be rolled out sequentially, and so Norwich <i>might</i> be first, it will need to cover the whole of the county	Re-word para 4 page 50 to say: "The availability of high-speed broadband is clearly of major strategic significance for Norfolk. The further rollout of broadband cannot be required through any current Local Plan, but the Norfolk authorities work closely with Better Broadband for Norfolk and other bodies and providers to ensure that high-speed broadband is delivered to more parts of the county as soon as is practicable. Emerging Local Plans will consider the extent to which they could <i>require</i> high-speed broadband to be delivered as part of new developments; the revised National Planning Policy Framework (NPPF), which is due out in spring 2018, might make this easier. The Authorities will also engage proactively with broadband and mobile network providers to better encourage the rollout of new infrastructure, particularly Openreach, and will seek to involve Openreach at the pre-application stage of major residential and commercial planning applications, as well as through consultations on the emerging Local Plans."

ANON-3C85-CA3V-G	Resident	Broadband connectivity and mobile phone coverage has to be the top priority. Ironically, achieving this will probably reduce the need for some of the other infrastructure projects - particularly transport. Decent broadband allowed me to work from a home office about 7 years ago (rather than travel into Norwich), releasing time, increasing my productivity and reducing my annual car journeys by around 6,500 miles.	This is noted and agreed - the Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	With many of the primary substations in Norfolk already reaching capacity, further housing growth in the local area would also put a greater strain on the electricity network. Meanwhile, improvements still need to be made to North Norfolk’s communications infrastructure, with unacceptably slow Broadband speeds and poor mobile phone signals limiting the amount of remote working possible, deterring businesses from relocating to the local area, and affecting tourism. However, this will likely require the installation of further base and booster stations to ensure adequate coverage. Hoveton Parish Council believes the locations of these extra stations should be carefully and sympathetically chosen so as not to adversely impact on local landscapes or quality of life.	The NSF recognises how essential fast broadband is and will help to promote this further. The location of base and booster stations is obviously important; where they are "permitted development" there is little control, but elsewhere the policies of the relevant Local Plan and the National Planning Policy Framework should ensure that inappropriate locations and designs are not acceptable.	No change to NSF
BHLF-3C85-CACQ-U	Historic England	Advanced, high quality communications infrastructure is essential for sustainable growth. The development of high speed broadband technology and other communications networks also play a vital role in enhancing provision of local community facilities and services. However, the siting and location of telecommunications equipment can affect the appearance of the public realm, streetscene, the historic environment and wider landscapes. The consideration of their positioning is therefore important, particularly in conservation areas. We suggest that you refer to the following guidance which you may find helpful: Cabinet Siting and Pole Siting Code of Practice: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf Whilst we support the improvement of network coverage and broadband provision in Norfolk we have concerns regarding the last sentence of section 7.5 on page 47 of the draft Framework document which states that, “Broadly, it should be made as straightforward as possible for 5G base stations and transmitters to be constructed, and common development management policy text to facilitate this should be explored, taking into consideration material planning constraints ”. Paragraph 43 of the National Planning Policy Framework (NPPF) states that local planning authorities, in preparing local plans, should support the expansion of electronic communications networks, including telecommunications and high speed broadband but that they should aim to keep the numbers masts and sites to a minimum consistent with the efficient operation of the network. There is concern that the above sentence would facilitate or encourage an overprovision of equipment which would go beyond that necessary for the efficient operation of networks. It is recommended that this sentence is reworded accordingly. Up to date and accurate evidence will be required to support this policy approach in line with paragraph 158 of the NPPF. The NPPF goes on to state that where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate. Crucially, the NPPF identifies the protection and enhancement of the historic environment as being a key strand in what it defines sustainable development (paragraph 7). We would therefore urge the Norfolk Strategic Framework and, any forthcoming associated Local Plans, to ensure that any telecommunications policies include a provision for the protection of the historic environment and a requirement for applicants to consider the siting, design and positioning of equipment in this context.	Comments noted. Some changes to the text to reflect the sensitivity of the historic environment will be added to relevant paragraphs	Add words to para 7, page 50 to say: "...should be explored, taking into account material planning considerations. In particular, care will need to be taken to ensure that new telecommunications equipment is sited and located sensitively in respect of the public realm, street-scene, historic environment and wider landscapes. "
BHLF-3C85-CACK-N	Hoveton Parish Council	Meanwhile, improvements still need to be made to North Norfolk’s communications infrastructure, with unacceptably slow Broadband speeds and poor mobile phone signals limiting the amount of remote working possible, deterring businesses from relocating to the local area, and affecting tourism. However, this will likely require the installation of further base and booster stations to ensure adequate coverage.	This is noted and agreed - the Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements	No change
BHLF-3C85-CACJ-M	Tunstead Parish Council	Our main concerns are the availability of better broadband connections and mobile phone reception in rural areas. This is essential for the development of businesses in parishes such as Tunstead.	This is noted and agreed - the Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements	No change
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Mobile & BB: the Council emphasizes the need for high quality infrastructure to support the rural economy and improve the success of small businesses and homeworkers.	This is noted and agreed - the Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements	No change
BHLF-3C85-CA3B-V	Member of Parliament	Turning briefly to infrastructure matters, I have noted the content of section 7.5 (Telecoms) and would wish to see the final framework be much more ambitious in this regard. I know from my own experience that Openreach is keen to have pre-application conversations with developers, promoters and local authorities, particularly on larger developments. I would like to see the final draft of the framework commit local planning authorities to arranging and hosting such discussions with a view to maximising the benefits for future residents. The same principle should apply to health services and education provision.	The comments are welcomed, and the text of the NSF will be strengthened to reflect the points made	Re-word para 4 page 50 to say: "The availability of high-speed broadband is clearly of major strategic significance for Norfolk. The further rollout of broadband cannot be required through any current Local Plan, but the Norfolk authorities work closely with Better Broadband for Norfolk and other bodies and providers to ensure that high-speed broadband is delivered to more parts of the county as soon as is practicable. Emerging Local Plans will consider the extent to which they could <i>require</i> high-speed broadband to be delivered as part of new developments; the revised National Planning Policy Framework (NPPF), which is due out in spring 2018, might make this easier. The Authorities will also engage proactively with broadband and mobile network providers to better encourage the rollout of new infrastructure, particularly Openreach, and will seek to involve Openreach at the pre-application stage of major residential and commercial planning applications, as well as through consultations on the emerging Local Plans."
BHLF-3C85-CAJD-N	Resident	Page 40 – the second objective is “to reduce Norfolk’s greenhouse gas emissions” and one of the methods is “to reduce the need to travel”. Why not say “to minimise”? You say “maximising the energy efficiency of development” so why not “minimise” for greenhouse gas emissions and travel? It is much stronger and more precise than reducing.	NPPF uses both minimise and reduce so it is considered appropriate wording	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	There does not seem to be reference to low carbon adaptation such as electric vehicles and the necessary infrastructure as it would seem to be a piece of development needing a strategic approach across the county. Although there is reference to climate change resilience and adaptation there is minimal coverage of how that will manifest itself.	Agree to make reference to electrical charging infrastructure	Add to Transport agreement - support initiatives for electric vehicles when this is added to future version of NSF

ANON-3C85-CA6V-K	Diss Town Council	It is felt there is insufficient reference to connectivity to neighbouring areas including where relevant, Suffolk and Cambridgeshire. The Diss & District Neighbourhood Plan crosses parish, district and county boundaries to develop a more strategic approach to issues created by the lack of planning for infrastructure investment across the county boundaries. More information is available here: http://www.diss.gov.uk/neighbourhood-planning/ It is considered imperative that the Norfolk Strategic Framework also takes account of the need to consider cross boundary requirements. It is therefore suggested to add to the second bullet point below: Section 7 – Infrastructure and Environment Strategic Infrastructure and Environmental Objectives To realise the economic potential of Norfolk and its people by: strengthening Norfolk’s connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure; and ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk’s main settlements and 'across county boundaries' to strengthen inward investment.	Agree, objective updated.	Wording included in objective
ANON-3C85-CAXW-P	NUA	We note the different demographic profile of the city of Norwich compared to the county. We would welcome a strategy that recognised and incorporated the different needs of younger, highly educated and relatively affluent people, with regard to housing, transport and culture, as this would support our shared desire to retain talent within the region.	Agreed, this is an important matter but this is largely a matter for the greater Norwich local Plan, if wider issues are identified then this can be picked up in future versions of the NSF	No change to NSF
ANON-3C85-CA87-P	Resident/Town Councillor	Unsustainable housing is damaging the Environment	Noted	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	Please note points made earlier on need for high quality educational proposition across the county not just to service numbers but as part of 'locational' proposition. NB also the interrelationship between the provision of schools on a local basis and trip generation. Communities should be planned such that children can walk to school , safely and independently. The drive towards larger school sizes can mitigate against smart footprinting of settlements to reduce trip generation. Co-location of after school care and nursery schools should also be considered along with public transport accessibility.	Noted	No change to NSF
BHLF-3C85-CACZ-4	Broadland District Council	The Education Standards is NSF pg 49 top of the page. I think this may be a bit out-of-date and the latest Ofsted results better – that doesn’t mean that the statement is wrong, but its probably worth checking with someone at County Education to check that the message is not now a bit different.	Noted changes made as part of an updated section provided by Norfolk county council	Rewritten education section included in update NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	The section on Education should be updated to read: Norfolk’s School Capacity return to the DfE (SCAP) indicates that Norfolk’s school population will continue to grow over the next 10 years. Primary age population including the influence of housing with full permission will rise by around 4% and secondary by 22% (children currently in the school system including the additional 4% covered by growth). Further housing coming forward is likely to produce a higher increase percentage. More specifically, September 2017 school population is over 1300 more than in 2016. Year 10 currently has the lowest cohort of children and numbers have risen steadily since 2006 when that cohort joined the school system in reception. September 2016 reception cohort was nearly 800 pupils higher than it was 5 years ago. Recent years have seen a significant rise in the birth rate and demand for pupil places across the area. Pressure is mainly in urban areas which have seen the highest concentration of population growth. The speed of delivering houses is key to the requirements of school places so careful monitoring of housing progress is undertaken between County Council/District/Borough Councils. Standards in Norfolk schools have risen considerably over the past 5 years with 88% of schools being graded Good or Outstanding in 2017 compared with 70% 4 years ago. The Local Authority retains responsibility for ensuring that there is a sufficient supply of school places and works with a range of partners, eg. Dioceses and Academy Trusts to develop local schemes. Norfolk County Council’s School Growth and Investment Plan, published every January identifies three growth areas requiring more than one new primary phase school and a further 10 areas requiring one new school. Expansion to existing schools will also be required in some areas of the County. A new High School for north east Norwich is also being discussed and planned. Agreement 19 (Education) – is supported and would be strengthened by adding: “H. and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate” Also It would be useful if Agreement 19 could be expanded to indicate: “The authorities agree to continue supporting the implementation of the County Council’s Planning Obligations Standards as a means of justifying any S106 payments or	Agreed	Rewritten education section included in update NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	Similarly, an increase in demand for places at local schools will prove unsustainable unless a sufficient supply of school places goes hand-in-hand with housing development.	Noted this is already part of the planning process with additional school places funded through S106/CIL where appropriate	No change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	Persimmon Homes supports the Agreement for LPAs and the County Council to work together to ensure a sufficient supply of school places and land (Agreement 19). Timely delivery of education infrastructure is critical to the delivery of housing and Persimmon Homes are proud to be a partner in the upcoming delivery of primary school sites in Brad\elf, Sprowston and Hethersett to ensure new school places are available when needed to support families in new housing.	Noted and support welcomed	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 7.3 - it would appear that electricity transmission is a limiting factor for any significant growth. This will be exacerbated if the need to charge electric vehicles becomes more widespread.	Noted, addressing capacity issues is part of the planning and delivery process	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	With many of the primary substations in Norfolk already reaching capacity, further housing growth in the local area would also put a greater strain on the electricity network.	Noted, addressing capacity issues is part of the planning and delivery process	No change to NSF
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Renewable energy: the Council supports the frameworks desire to support renewables. APC feels the focus needs to be on more small scale developments and that these should be focused on wind and not solar.	Noted	No change to NSF
BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	The scale of Figure 11 is too coarse to interpret – insets would be a great help.	Agreed, insert link to NBIS website which contains greater resolution maps	Reference added
BHLF-3C85-CACC-D	South Norfolk Council	Telecoms – chapter 7.5 The map shown in Figure 7 (NGA broadband access as at 2014) is now out of date. This should be replaced with the most recent information.	Noted and map updated	Link added to up to date maps and new map inserted
BHLF-3C85-CA3F-Z	Great Yarmouth Borough Council	A small correction to the ‘Coastal Evidence (Flooding and Coastal Erosion)’ paper published in support of the Norfolk Strategic Framework appears to be required. In the table of uncosted potential future projects at page 28 the reference to a ‘North Winterton flood risk project’ should be deleted: no project of this name is currently known. It appears to have been mistakenly named or listed as a potential project, and its inclusion has led to a degree of confusion and consternation locally.	Agreed and updated	Updated document added to related documents
ANON-3C85-CA87-P	Resident/Town Councillor	Recognises Flooding as an issue but with no money available to address this, just to say it is an issue is not at all helpful	Noted	No change to NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	Given our locality, Council is also very concerned about the risk of coastal flooding, and the funding of sea defences. There seems to be no overall view on this, other than to repeat the problems and leave it to the local authorities. We continue to express our view that NCC should be more involved in the flood defences, as part of a wider shared responsibility.	The Wash East Coastal Management Strategy was developed locally by the EA and Borough Council to provide the overall policy for this part of the Norfolk coastline. This is recognised in the NSF background paper on Flooding and Coastal matters. The County Council's role in coastal matters is outside the remit of the NSF.	No change to NSF

BHLF-3C85-CA3W-H	Hoveton Parish Council	Hoveton has experienced numerous problems in recent years with surface water flooding on roads within the parish, making some key routes impassable at times, and creating dangerous and difficult conditions for road users and pedestrians. Some residential properties have also been identified as being at risk of flooding, whether from surface water flooding, rising river levels, or extreme weather events. The Parish Council feels that, in many areas, surface water drainage is inadequate and unable to cope with current demand, and that these problems will only increase with further housing development. Further housing development would also put extra pressure on local water supplies and foul drainage capacity, which are already stretched in many areas.	Will be passed on to the lead local flood authority	Pass comments onto Norfolk county council
BHLF-3C85-CACM-Q	Savills	Support is given to the aim to minimise the risk of flooding through a co-ordinated and proportionate approach. It is understood that this in the interests of protecting the communities of Norfolk from the effects of climate change and coastal erosion in accordance with Paragraphs 94 and 95 of the NPPF.☒	Support is welcomed and noted.	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	P55 could benefit from reference to the Broadland Futures initiative seeking to take an integrated approach across the coast and the Broads to managing flood risk especially looking to the medium and longer term. This is being adopted by EA, NE and the other local authorities as a way forward. We can advise further.	Include reference to the Broadland Futures initiative (Broads Authority to provide text).	Include reference to the Broadland Futures initiative
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Flooding: APC supports the proposal but would like to add that a changing weather pattern causes deluges that the current drainage system cannot cope with. There is a need to maintain local low tech infrastructure of ditches and soakaways.	Noted	No change to NSF
ANON-3C85-CA87-P	Resident/Town Councillor	The anticipated departure of immigrants in the NHS and care sector on account of utterly stupid Brexit so called policies, means a breakdown of social infrastructure is inevitable. This section, as with other needs to take into account this elephant in the room.	Impacts too uncertain. It is not possible at this stage to predicted the impacts of Brexit on infrastructure provision	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited supports the commitment to infrastructure enhancements in Norfolk. To address social infrastructure capacity issues, the proposed SUE will include a new link road, two new primary schools, open space and sports pitch provision and other essential infrastructure such as local and neighbourhood centres and utility upgrades. Additionally, provisions will be considered to help enhance existing health and social care facilities through financial contributions, where viable and necessary, in line with the Strategic Services and Development Plan produced by the Primary Care Trust.☒ Attleborough Land Limited also understands the need to upgrade and enhance appropriate utilities infrastructure to support the SUE. The utilities assessment submitted with the application, as part of the environmental statement, sets out the SUE's impact upon existing networks and the new infrastructure needed to support the development. This infrastructure will be upgraded/provided in conjunction with the relevant bodies and secured through the Section 106 legal agreement or direct agreements with infrastructure/utility providers.	Noted, support welcomed	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	The emphasis is on the traditional things of such policy documents: improving roads, housing and employment. Could the document build in cycling infrastructure, high quality housing that is climate adapted/ low carbon/ minimises flood risk/ sits within vital GI /and growth.	Reference to cycling in new transport agreement, other points are part of the objective sections	New transport agreement to include references to this in future version of the NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	Agreement 16 – Council has long had issues with the overall amount of development given problems with infrastructure etc. which it has repeatedly expressed in planning consultations. Hence it is puzzled, indeed shocked, to see that the numbers will be increased to speed up delivery, and that this is “additional” housing. Surely the number should be restricted to what is needed.☒	The delivery buffer is to ensure required development is met and not to exceed delivery requirements	No change to NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	Overall, the document disappoints, as so much of it seems to be the customary box-ticking exercise, rather than being a document of real value and utility to those whom it affects. Secondly, we see once again the West of the County being disadvantaged in every important respect, and would have hoped for some signs of an understanding of this, with the situation being addressed, given the supposed County-wide nature of a “strategic” document.	Concerns noted but it is unclear as to how the west of the county is being disadvantaged	No change to NSF
ANON-3C85-CA61-E	Define Planning & Design Ltd	The strategic objectives for infrastructure and the environment are supported and appropriately focus on strengthening connectivity through the delivery of new and enhanced infrastructure, linking to the rest of the UK and between and within Norfolk’s main settlements. This is fundamental to the delivery of the anticipated development growth across the County and must include connectivity for all settlements already identified as key growth locations, not only the major urban areas.☒ The critical role of other bodies in the planning, funding and delivery of infrastructure should also be explicitly referred to in order to encourage their proactive involvement. For example, the objective should reflect that it is the responsibility of the utilities company to provide the necessary water supply and wastewater infrastructure to support development. Their investment programmes are not necessarily integrated with Development Plans, and often will not address the development requirements for an area until specific proposals become committed, normally through the grant of planning permission. ☒ Given the largely rural nature of the County, the scale of growth proposed will inevitably require the development of previously undeveloped land and careful consideration of the environmental benefits will be important in achieving the environmental objectives of this framework. In this regard, the provision of green infrastructure in conjunction with development, and notably multi-functional green spaces to maximise associated recreational benefits, is fully supported.☒ The objectives proposed to improve quality of life for the population overall, both now and in future, can be appropriately met through comprehensive development that encompasses identified social and community facilities and green infrastructure as an integral part of providing new housing and employment. This strategic approach has been applied in relation to the proposed strategic expansion of Fakenham.☒	Support noted issues engaging with utilities is a national issue. Utilities have been engaged in the production of the NSF particularly Anglian Water. Wider connectivity to be included in a new transport agreement. Agree that reference to how water and water recycling infrastructure is funded as part of the business planning process and by developers should be included in the final Norfolk NSF together with the work currently being undertaken by AW – WRMP and Long Term Recycling Plan.	Updates to water section and new transport agreement to include references to this in future version of the NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	We support the overall strategic and environmental objectives in the Framework.☒ The recognition of the likely key infrastructure improvements that will ease congestion, increase road and rail capacity and will shape future travel patters is also of importance and will lead part of the sequential analysis which could identify sites to come forward for planned garden communities.☒ We are of the view that there are clear development opportunities linked to re-use of rail lines and the opportunities, should have greater recognition, as highlighted in Question 7 (Section 3), as well as the main rail network improvements, which are also to be supported.☒ We feel that there should be a greater understanding of the role that developments can be made to meet the range of objectives included in this section, and what can be realistically funded by imaginative collective means.☒ With the standard speculative housing model, as primarily advocated in the consultation, these objectives are difficult to secure. Garden community land value capture providing reliable and continuous income through a Garden Community Development Corporation or a long-term land owner/master developer working in partnership with local authorities, can secure funding streams to secure essential infrastructure and community facilities. This creates a genuine opportunity for change. Indeed, it might transform the future spatial expression of community development in Norfolk.☒ The urban extensions to existing towns that are necessary to meet housing growth targets should also be selected on the basis of their ability to fund and deliver critical road, public transport and green infrastructure improvements to people lives through the use of land capture models. A real opportunity now exists to deliver a section of primary distributor road around the south side of Dereham through a series of small urban extensions to ease traffic congestion problems within the town. This approach seeks to extend the same route planned to be delivered through emerging housing allocations 2 and 5 in the pre-submission version of the emerging Breckland Local Plan. As the land required to deliver this route can now be made available through careful long term planning this scheme should be included as a priority road project for promotion within the emerging Framework ☒	These are largely matters for local plans and not strategic cross boundary issues.	No change to NSF

ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	Add to this para:¶ To realise the economic potential of Norfolk and its people by:¶ strengthening Norfolk’s connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivityinfrastructure; and¶ ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk’s main settlements to strengthen inward investment. ¶ (insert) by strengthening Norfolk's place competitiveness through the delivery of well planned balanced new communities with a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.¶ ¶ ie high quality mixed development is part of the infrastructure proposition; as is the provision of the appropriate social infrastructure . New trends in business location and investment trends are gravitating towards locations which make this offer¶ ¶ (insert) ensuring the long term preservation of Norfolk's natural environment and heritage, recognising that these are key elements of the county's place competitiveness and locational proposition.¶ ¶ As a general point, Norfolk's future infrastructure proposition should be attuned to the critical characteristics of its geography and quality of life proposition.¶	Agree to add points to objectives with minor wording changes	Points added to objective with minor wording changes
ANON-3C85-CA3K-5	Natural England	Section 7 - Infrastructure and Environment¶ p40 The wording of the environmental objectives to improve and conserve Norfolk's environment should be amended in line with our revised wording for the objectives listed on page 9.¶ ¶ p41 Second paragraph, fourth line down. It should read "...its historic City..." rather than "...it's historic City..." .¶ ¶ 7.4 Water ¶ p43 Last paragraph, first sentence. Delete the word 'significant' so that it reads "...with no detriment to areas of environmental importance." ¶ ¶ 7.8 Flood Protection and Green Infrastructure¶ Flood Protection. ¶ p54 Third paragraph, first sentence. It may be better to replace the word 'could' with 'is likely to' as climate change research has concluded the probability is that these events would happen.¶ ¶ p54 Fourth paragraph, second sentence. Add at the end of the sentence "...and away from flood plains wherever possible." ¶ ¶ p58 Agreement 20. The importance of all of Norfolk's environmental assets in contributing to the financial and social wellbeing of the county should be recognised in the wording of Agreement 20, rather than restricted to those which are located within the Brecks, the Broads and the Norfolk Coast Area of Outstanding Natural Beauty. Environmental assets outside of these areas are under development pressure too. We recommend that Agreement 20 is amended as follows:¶ ¶ "a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, bring to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; and¶ ¶ b) the pressure that development in Norfolk could place on these assets¶ ¶	Updates made to cover the points mentioned	Updates outlined in comment have been made to NSF
BHLF-3C85-CACQ-U	Historic England	The strategic infrastructure objectives again helpfully refer to the need to protect and enhance the built and historic environment. This section also recognises the need to protect the setting of existing settlements by preventing the unplanned coalescence of settlements. It is necessary to point out there that planned coalescence may also be harmful. The document outlines the need for large scale infrastructure delivery in the area and we are keen to ensure that the historic environment in all its forms is considered at an early stage to ensure its conservation and enhancement. We note that an Infrastructure Delivery Plan (IDP) is currently being prepared and we look forward to being consulted on that document.	Noted, consultation will take place on the individual projects within the IDP	No change to NSF
ANON-3C85-CA62-F	Resident	1. This document contains some nice statements about environmental protection and encouraging alternatives to the car but the details show that the aim is to destroy yet more of what makes Norfolk special and unique. In particular, as areas around Norwich become more and more built up with ugly new housing, roads and business parks, our surroundings will become as degraded and ugly as many existing parts of southern England. ¶	Noted	No change to NSF
ANON-3C85-CA62-F	Resident	3. I only found out about this on 19th September 2017. The consultation needs to be publicised and the consultation period should be longer if you are serious about "increasing community involvement in the development process at local level".	Concerns noted the length and nature of the consultation was considered appropriate for a document of this type.	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	As a general point we would suggest that there is a mismatch between the planning aspiration set out and the infrastructure proposition envisaged. ¶ ¶ The planning proposition appears to be well grounded in the theory and practice of sustainable community building, however the infrastructure approach appears to take little cognisance of sustainability nor leading edge locational thinking, looking for rather dated heavy infrastructural and car based, rather than place based solutions.¶ ¶ A further point is that while the planning proposition is enlightened , it is difficult to see what within this document can make it enforceable.¶ ¶ We would welcome discussion on both of these points	Concerns noted the document is a set of agreements which will inform local plans and help fulfil the duty to cooperate.	No change to NSF
ANON-3C85-CA6Q-E	Resident	Observation: As one reads further into this document, the strategy becomes less strong, and devolves its observations to other documents and initiatives outside the framework document. This weakens the value of the document. Infrastructure and environments is one such weak section, with many items of infrastructure and utility solutions being identified. These need to be bottomed out in the same way other sections of the document have done.	Noted, further changes have been made to the infrastructure section	No further change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	Persimmon Homes supports the Norfolk Planning Authorities holistic commitment to providing vitalinfrastructure enhancements. These enhancements are crucial to facilitate economic growth and meethousing demand in Norfolk. Many key pieces of strategic infrastructure, particular new roads, rivercrossing and utilities will need public and pooled funding, otherwise viability and delivery, particularlyfor large allocations, could be compromised.¶	Noted	No change to NSF
BHLF-3C85-CA34-E	Norfolk Geodiversity Partnership	Strategic Objectives (page 40) ¶ No mention of conserving geodiversity. This is a requirement, as per NPPF sections 109 and 117, so needs mentioning here. ¶ <protecting sites of geodiversity interest and, where appropriate, enhancing them as part of development.> ¶ ¶ If it is not mentioned as a separate bullet point then it needs adding to bullet point 1: ¶ <ensuring the protection and enhancement of Norfolk’s environmental assets, including the built and historic environment, geodiversity assets, protected landscapes, Broads and coast;>. ¶ ¶ ¶Green Infrastructure (page 57) ¶ Geodiversity has not been included in the baseline information scoped for the GI Strategy, contra Natural England's guidance document 2009. The NGP or NBIS can supply	Agreed, this issue was also made by Natural England and their wording has been used.	No further change to NSF

ANON-3C85-CACS-W	Norfolk Wildlife Trust	Support objectives unde "To improve and conserve Norfolk’s environment" GI and Environment: planning and provsion of green infrastrucure is critical to help mitigate for imapcts of new devlopment on sensitive widlife sites and to coesate for loss of biodivewrsiyt as a result of new developments. The emerging ecological network and GI maps are an important part of this process. and provide evidence and rational for provsion of new gree space3. Follwing from tis it is critical that fudning meachnisms are in place to ensure that GI is provided as planned.	Support welcomed delivery and funding is subject to on going efforts	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited appreciates the impacts of the SUE upon ecological infrastructure. Therefore, mitigation measures will be exercised wherever possible to preserve and enhance ecological networks. The provision of the linear park and green corridors will enhance the areas biodiversity compared to its current use as arable fields, by providing for a wider range of habitats.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CA3P-A	Heaton Planning Limited on behalf of Brett Aggregates	Section 7 – Infrastructure and Environment Paragraph 7.8 Flood protection and Green Infrastructure Page 57 advocates that, ‘Green Infrastructure should be provided as an integral part of all new development’. It may not be appropriate for all development to provide some or additional Green Infrastructure and we would suggest that this should be caveated by, ‘where appropriate’. Figure 12 identifies draft Green Infrastructure corridors. Whilst we would support the Local Authorities in devising a general strategy for Green Infrastructure provision, we would suggest that this document is not the appropriate forum for defining these areas. There should be provision at a local level as part of the Plan making process or as part of Planning Applications to assess the quality and quantity of current Green Infrastructure levels and where it may or may not be appropriate to extend/replace.	Regarding the GI corridors, GI is a clear cross boundary issue so Norfolk Authorities working together to address GI not only brings with it economies of scale thus reducing individual Authority costs, but addresses a key cross boundary issue. Individual local plans will reflect this wider Norfolk work as the comment suggests. The NSF will identify more strategic corridors to inform local plans and local delivery opportunities.	Where appropriate added
BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	The Norfolk Coast, the Brecks and Broadas are seen by the report as providing economic benefits partly through their attractiveness for tourism and recreation but also through their contribution to the quality of life and hence the attraction of Norfolk as an area in which to work, live and locate a business. This environment is regarded as an asset. There is emphasis within the report on the quality of the environment and the protection and management of environmental assets by ensuring that new development will not harm habitats and species. The impact of housing and recreation are seen as forces to be “monitored” and “mitigated”. However in para 7.6 the report says “It is clear that health issues will become an increasingly important consideration in the future planning activities. Development should facilitate a healthy lifestyle through a healthy environment where pollution is controlled and there is adequate access to open spaces and green infrastructure.” The report also says that as Norfolk grows considerable investment in the provision and maintenance of the Green Infrastructure network will be needed in order to facilitate and support growth whilst also ensuring that existing and new residents receive the health and quality of life benefits of green infrastructure. Comment: It is pleasing to see that so much emphasis has been put on the benefits of the environment for quality of life and health lifestyles. What is surprising is that there is no mention of Public Rights of Way within the heading of Green Infrastructure. Nor is it clear that the development and maintenance of the historic rights of way are seen as important in meeting the growing demand for walking activities as the requirements for access are only briefly mentioned in the context of development. We are very interested in the concept of Green Infrastructure corridors and the implications of these for access and the PROW network and would like to see more detail or be part of a consultative process. In this context it is worth noting that the Ramblers Association carried out an exercise in 2015 on the PROW network condition, benefits and issues entitled The Big Pathwatch. The results (based on physical surveys of a large and statistically significant random sample of OS squares carried out with online recording of data which involved members of Ramblers and the general public) showed that in Norfolk walking on PROWs was regarded as a positive experience in 25.6% of squares surveyed but that 22.1 % of surveyed OS squares had inconvenient or unusable paths (the remaining half were something in between). We would hope that the report could recognise the importance of developing and maintaining these PROW assets as a network in view of the trends of growth in demand and consistency with quality of life benefits which we note above. Commendable work has been carried out on the Coast path in Norfolk and in developing the network of trails. This attracts visitors and may be also used by local population for exercise. However the rural network of paths and bridleways as a whole is facing a backlog of maintenance and will require a proactive approach to asset management if it is to provide the foundation for the growing numbers of population seeking access and exercise in the countryside. The loss of permissive paths previously funded under the DEFRA environmental stewardship schemes will only add to the pressure on the network.	Green Infrastructure is a catch all term. As set out in this Natural England document, it includes rights of way: publications.naturalengland.org.uk/file/94026. So PROW improvements could be a way of mitigating the impact of development, but so could providing or enhancing other GI types. Authorities do consider PROWs important in the implementation of GI.	Add a footnote to GI giving some brief examples of what GI means. Perhaps reference to the NE guide.
BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	Many of the Neighbourhood Plans under development in West Norfolk are considering Green Infrastructure. In Holme-next-the-Sea, following initial discussions with NCC the NDP team has been looking at ways of dissipating some of the pressures on the immediate coast by extending and improving the accessibility of the parish footpath network (relevant to NSF Figure 11). It would be really helpful if the NSF team could consult or make their own work available to Neighbourhood Plan teams before finalising their ideas on this.	Noted.	Reference to mapping added to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	‘Green infrastructure’ is also important to Hoveton Parish Council, as the Council recognises that this underpins the tourism economy and the health and wellbeing of residents and visitors alike. The Council agrees that ‘green infrastructure’ should be provided as an integral part of all new developments, alongside other infrastructure such as utilities and transport networks, and it is pleased to see Local Planning Authorities will be working together to produce a GI Strategy for Norfolk which will aid Local Plans in protecting and enhancing local assets such as conservation areas and Areas of Outstanding Natural Beauty. "	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CA3G-1	Dereham Town Council	The Town Council welcomes Green Infrastructure being given a high profile in the Framework with important and key green corridors being identified . This however does not accord with the Breckland Local Plan pre-submission which explicitly states that there are no key green linkages worth protecting and all green infrastructure has the same value and should be protected.	Noted. This is a matter for the breckland local plan	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	An aspirational GI proposition should be designed in to be part and parcel of every development as it enhances value and encourages healthy lifestyles. It is critical to see this as part of a wider dialogue with the farming community who can cheply and effectively produce extended walks through the institution of permissive paths. The edge of settlement should also be seen as part of a positive dialogue with farmers around public access, small scale growing and supporting local food sourcing. As DEFRA is in process of rethinking its support of farming these issues should be considered and advanced as partb fo a new settlement with the farming industry. It is critical that a strategic GI proposition is accompanied by consideration of how people can sustainably access the Broadas and Coast, and other key visitor and tourist destinations. Norfolks Coast and Broadas are already experiencing capacity issues it is vital that these key natural resources are not undermined by excessive popularity, and maintained in their integrity. The wider Norfolk Countryside fulfils a critical role both in supplying the nations food and in operating to support retreat and peace and quiet. Even areas which are not of outstanding beauty or ecological value have a role to play in fulfilling this role within a complex national geography. This should be respected in planning for growth. It should further be recognised that the county may face an exponential rise in visits when the recreational needs of the growth agendas of Cambridgeshire, Norfolk, Suffolk and East Midlands are taken into account together with the trend towards staycation and the weak pound. It will be vital that sustainable movement and accommodation solutions are found that do not negatively impact on the integrity of Norfolks natural and heritage environment, reconciling positively the opportunity of economic growth and the daily needs of local residents.	Local Plans are required to assess any likely significant impact on European designated sites and some of these protected sites do exist in the protected landscapes quoted. To inform the Habitat Regulation Assessment of the Local Plans, Norfolk Authorities commissioned recreational impact surveys which provide evidence to help understand the impacts development in Norfolk and further afield can have on the protected sites.	No change to NSF
BHLF-3C85-CAC8-2	Suffolk County Council	It is noted that, as part of the Green Infrastructure Strategy, there are Green Infrastructure Corridors, some of which abut the county boundary. It would be helpful to have further discussions to consider whether there is merit in tying these into initiatives in Suffolk.	Agreed. We will share the findings of the mapping work on line and discussion with neighbouring authorities will taken place.	Reference to mapping added to NSF
BHLF-3C85-CACM-Q	Savills	Objection is raised with regard to the provisions relating to green infrastructure. The NSF should provide guidance to clearly outline what provision is required both on-site and off-site. In order to ensure the viability and deliverability of new developments, the NSF should ensure that policy requirements do not overlap and/or are not excessive (e.g. green infrastructure being required on site but also contributions required to provision off-site).	The NSF addresses strategic issues. This comment seems to relate to individual development sites. Each Local Plan will have policies relating to GI.	No change to NSF

BHLF-3C85-CACQ-U	Historic England	We support the consideration of Green Infrastructure (GI) at the cross boundary strategic level. The draft Norfolk Strategic Framework document does seek to protect, manage and enhance the built and historic environment which is welcomed. Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider ‘multi-functional’ spaces only in terms of the natural environment, health and recreation. It may be helpful to make further reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term. "	Agree that the heritage benefits of GI could be referenced. Churchyards are an important part of GI. Comment regarding maintenance noted however this is a local issue.	Add reference to heritage into the first GI para of the NSF.
BHLF-3C85-CACQ-U	Historic England	The use of multi-functional greenspaces can help enhance the historic environment by better revealing it and making it more accessible. Therefore the strategic objective to provide a network of accessible multifunctional greenspaces should be beneficial to the historic environment and is welcomed.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	“New GI can also mitigate impacts on existing ECOLOGICALLY sensitive sites.”	Agreed.	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	It is recognised that as the NSF is rolled forward and updated, there will be a need to add GI projects as they reach an appropriate stage in their development.	Noted, although this will be for future versions of the NSF.	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	‘Green infrastructure’ is also important to Hoveton Parish Council, as the Council recognises that this underpins the tourism economy and the health and wellbeing of residents and visitors alike.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	The Council agrees that ‘green infrastructure’ should be provided as an integral part of all new developments, alongside other infrastructure such as utilities and transport networks, and it is pleased to see Local Planning Authorities will be working together to produce a GI Strategy for Norfolk which will aid Local Plans in protecting and enhancing local assets such as conservation areas and Areas of Outstanding Natural Beauty.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CA36-G	Forestry Commission East and East Midlands	Thank you for consulting the Forestry Commission on the Norfolk Strategic framework.☐ ☐ The Forestry Commission is a non-statutory consultee on developments in or within 500m of ancient woodland we are also Statutory Consultees for restoration of waste and mineral sites to forestry and the competent authority for Environmental Impact Assessments (forestry). ☐ ☐ Our role as a Government Department is to provide you with any information which can help you in decisions with regard to planning proposals which may impact on Ancient Woodland in particular and any other woodland where it may be relevant to your plans. ☐ ☐ Ancient Woodland as it is an irreplaceable habitat is a particular concern and in order to help Planning Authorities the Forestry Commission has prepared joint standing advice with Natural England on ancient woodland and veteran trees. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. ☐ The Standing Advice website will provide you with links to Natural England’s Ancient Woodland Inventory, assessment guides and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. Case Decisions demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our website.☐ ☐ We note that in the strategy it states in Agreement 20: In recognition of: ☐ a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty bring to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; and ☐ b) the pressure that development in Norfolk could place on these assets ☐ the Local Planning Authorities will work together to produce a GI Strategy for Norfolk by the end of 2017 which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.☐ ☐ We also note that whilst the Brecks are mentioned there isn’t any mention of Thetford Forest (the largest lowland Forest in England) or of Forest Enterprise England (FEE) the agency of the Forestry Commission that manages the Public Forest Estate. ☐ ☐ Given the significant importance of Thetford Forest to the tourist economy and the environment ☐ • 1 million visitors/year • it encompasses 20% of the Breckland Environmentally Sensitive Area and is therefore a significant contributor to Breckland conservation.	Noted. Forestry Commission will be contacted regarding the GI mapping work.	NSF to involve the Forestry Commission regarding future GI work.
BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	The document notes the importance of tourism businesses, which are more dispersed than many other economic activities - and far wider than “Norfolk Coast, the Broads and the Brecks” listed. Comment: Norfolk has a number of promoted ‘Norfolk Trails’ across the county, plus, in many locations (though not all), a good network of PROW. Together these can constitute an opportunity to promote the county as a good destination for walkers and cyclists, but one that is not located within specific localities.☐	Noted. PROW have informed the Norfolk-wide green infrastructure mapping work that is ongoing.	Add PROW and 'Norfolk Trails' as an important asset
ANON-3C85-CA31-B	Wroxham Parish Council	‘Green infrastructure’ is also important to Wroxham Parish Council, as the Council recognises that this underpins the tourism economy and the health and wellbeing of residents and visitors alike. The Council agrees that ‘green infrastructure’ should be provided as an integral part of all new developments, alongside other infrastructure such as utilities and transport networks, and it is pleased to see Local Planning Authorities will be working together to produce a GI Strategy for Norfolk which will aid Local Plans in protecting and enhancing local assets such as conservation areas and Areas of Outstanding Natural Beauty.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	Persimmon Homes acknowledge the recognition of the Brecks, Broads and AONB importance to the quality of life (Agreement 20). However, there does need to be a further recognition that these areas are also reasons why people will want to live and work in Norfolk. There needs to be an acceptance that these places will be used by new residents. Such pressure should not be used as a reason for not allowing new development where it is needed, particularly where impacts can be mitigated,	The agreement as drafted recognises that these landscapes are reasons why people live here and visit, through reference to the benefit they make to the quality of life, the economy and tourism. Local Plans are required to assess any likely significant impact on European designated sites and some of these protected sites do exist in the protected landscapes quoted. To inform the Habitat Regulation Assessment of the Local Plans, Norfolk Authorities commissioned recreational impact surveys which go someway to help understand the impacts development in Norfolk and further afield can have on the protected sites.	No change to NSF
ANON-3C85-CAXS-J	Resident	Improved services at NNUH must be achieved.	Noted the health protocol aims to help address these issues.	No change to NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	Council also notes a prediction of a 43% increase in the number of over-65s in the Borough of KL&WN. We know from our own research (during our Neighbourhood Plan preparation) that the single most pressing concern of residents is the provision of GPs, and the difficulty obtaining treatment and appointments. There does not seem to be anything about the number of doctors to cope with that increase, however, but much about the consultation of CCGs on house-building. As ever, we will not get the service sorted to cope with present levels before the additional housing is introduced, but will muddle through; it is simply not acceptable to say that the provision is a commercial decision for health providers. Something on attracting medical professionals to Norfolk, a well-documented problem, would be more useful.	Noted the health protocol aims to help address these issues.	No change to NSF

BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	The plan clearly identifies some important trends which are likely to occur within this period. It notes in particular that there will be growth in terms of population, economic development (including tourism) and housing. Much of the growth in jobs is expected to occur in the greater Norwich area but corridors of growth are identified between Cambridge and Norwich, King’s Lynn and Cambridge and along the A47 corridor between Norwich and King’s Lynn. A number of interventions are planned in a new economic strategy to be published in 2017. Population as a whole is projected to grow by 14 % (2014 to 2036) with most of the growth occurring in the over 65s population which is projected to increase by 46%. This increase in the over 65s is especially marked in South Norfolk, Breckland and North Norfolk. Despite the relatively stable population for the under 65s, the number of jobs is projected to grow by over 60,000 of which about two thirds is in the Norwich area. It is expected that housing will grow to accommodate the growth in household formation but that excludes the need for social care where a deficit of over 8,000 care home places is projected (as against 9,900 care home places and a deficit of 600 now). Comment: With a recognition of increasing longevity there is a growing demand from the over 50s for physically active recreational activities which help manage risks of ill health through diabetes, heart attacks and strokes. Awareness of risk, including the lack of care facilities, appears to be driving more healthy behaviour and creating a fitter more active cohort of retirees. Health walking, rambling and strolling activities are being promoted as an effective and safe means of retaining good health and we are likely to see a significant growth in these activities as the population of over 65s increases. Variety of route and surroundings is an important feature of walking. The nature of the demand varies and ranges from individual short circular walks or strolls of up to 3 miles, brisk organised group walking usually around 3 miles and longer group led circular walks, mostly between 4 and 10 miles. Longer walks of up to 20 miles are usually the choice of younger and fitter walkers. City walking as an alternative to the use of cars will grow too but this is a more journey based, repetitive activity. We comment later on the steps already taken to develop rural walking infrastructure and the challenge of maintaining a viable network of public rights of way (PROW). At this point our main point is that the growth of the over 65 population is very significant and we believe that it is an omission of the report to fail to reflect the growth in their walking activities and the likely consequences for green infrastructure.	It is considered that the points raised are covered in the first paragraphs of the health section	References made in GI section to the demographic changes likely in Norfolk and ensuring that they have appropriate access to recreational opportunities
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	All development should be designed with the aim of maximising walkability to underpin public health objectives, This means planning for and delivering mixed use development where daily needs can be served on foot or by other sustainable modes. The potential for active leisure should also be built into developments with the re-institution of funding (if not via DEFRA through a local CIL type mechanism) regimes that open up permissive paths into the countryside to facilitate extended walking and riding.	It is considered that the points raised are covered in the first paragraphs of the health section	No change to NSF
ANON-3C85-CACR-V	Norfolk & Waveney STP	The Norfolk Strategic Framework for planning does not make any reference to the Norfolk and Waveney Sustainability and Transformation Partnership (STP), and does not appear to have considered how planning in health can be applied in conjunction with the principles of the STP. This is of concern to the STP partners for a number of reasons, as discussed below.¶ The aims of the STP are to develop closer and more integrated working amongst the different partners and providers of healthcare across Norfolk and Waveney. This includes moving care closer to home and focussing on prevention of illness. In order to be able to achieve planned improvement to health and care, integration of services around local communities, and enable delivery of new models of care, it is important the estate function of the STP remains flexible and responsive to the planning system – leading to the development of fit for purpose health infrastructure that provides the health services required by the public. In order to do this, it is imperative that the planning process engages with the STP at the earliest opportunity, ensuring that the planning proposals meet the needs of all of stakeholders involved and the STP can be incorporated into the process moving forward rather than retrospectively applied to the possible detriment of all involved.¶ As part of a collaborative and joined up approach to delivering healthcare, and considering the principles of the One Public Estate (OPE) programme, the estate space required may not be standalone but may be integrated with other public sector services, for example in a community hub. It is important that OPE/STP is considered at the very early stages of planning to ensure that buildings and services are future proofed and will be fit for purpose for future years. By engaging with the STP process at this early stage it would allow for input to ensure that this occurs and that where necessary, and to ensure future proofing, sufficient flexibility can be applied to any proposals involving health.¶ The publication of the Health Protocol for engagement of health in planning matters recognises the role of Clinical Commissioning Groups (CCGs) as the primary authorities for planning of health services. The advent of introducing Sustainable Transformation Plans within the NHS has led to a collaboration of commissioning and provision across health systems. This is represented in all spheres of health service design, and as such, has become a single point of contact for Planning Authorities to link to for planning purposes within health infrastructure. The Norfolk & Waveney STP combines CCGs and health providers within its Estates Work stream to manage and plan strategy for health infrastructure development.¶ In consideration of the recommendation 18 of the Consultation document (to adopt the Health Engagement Protocol as set out), feedback and agreement is sought to amend the published Health protocol to encompass development within the Health sector of the STP, and the role it plays in response to Planning matters. The current Protocol does not appear to have been authored by Health system representatives, and therefore a short period of review of the main document is recommended between Protocol authors and representatives of the STP / Health system to ensure the document and future form of engagement is in line with Health system strategy and development.¶	The comment is noted and accepted. Contact has been made with Norfolk and Waveney Sustainability and Transformation Partnership to discuss ways in which the Planning in Health Protocol can be aligned with the priorities of the Sustainability and Transformation Panel.	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	The Parish Council supports the idea that ‘health and wellbeing of the population’ and health infrastructure should be considered in planning decision making. Hoveton’s medical centre and other local healthcare services are already under pressure, and a population increase from further housing development would only exacerbate the <u>problems being experienced by local residents when trying to access timely, quality health care.</u>	Noted the health protocol aims to help address these issues.	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	"Comments from a public health perspective Several of these comments relate to the potential for shared priorities nd consistent approaches rather than specific strategic cross boundary issues. Nevertheless, the NSF provides the opportunity to consider this potential. • Support the principle to develop a “good relationship between homes and jobs” as it supports active travel and minimises vehicular movements, while recognising the need to avoid any potential adverse environmental impacts on residential accommodation of the employment activity within a close proximity (air quality, noise, access to open spaces etc.) (p.8) • Support “a major shift away from car use towards public transport, walking and cycling” (p.8). Recent evidence review by Public Health England on spatial planning correlates provision of active travel infrastructure and public transport with better outcomes relating to health, cardio vascular disease and road traffic accidents / KSI • Provision of good quality housing (p.9) is a fundamental determinant of health and we would strongly support a mix of accommodation which meets a variety of income and physical needs. The same PHE report emphasises the importance of warm and energy efficient homes on health outcomes. There is also evidence which highlights the importance of upgrading existing stock as well as the quality of new build and some reference to this may be welcome. It may also keep existing housing stock in use for longer, reducing the need for new build.	Support Noted	No change to NSF

BHLF-3C85-CAC5-Y	Norfolk County Council	- The review also highlights the need to consider particular housing needs of other groups such as those with a learning disability, history of substance misuse, affordable housing for those who are homeless and those with chronic medical conditions such as HIV / AIDS. The need to plan for older people and students is referenced (p.37) so specific reference here may make sure these groups are not overlooked Access to sporting, physical activity and green and open spaces and facilities is supported and we want to ensure this is available across tenures and locations, with particular reference to the challenges within the housing White Paper on access to open spaces within urban areas¹ - With a 2036 end date for the framework, and the recent announcement on sales of petrol and diesel cars ending by 2040, the NSF could usefully reference cross border and cross agency work to support the switch to low emission vehicles, for example, charging points delivered both within new developments and at appropriate points on the road network (p.15). This is supported by recent NICE guidance on air quality - Consideration could be given to a consistent approach on urban design for example the use of green walls and planting to mitigate poor air quality or avoid unintended consequences relating to “air canyons” may be useful - With regard to population and household estimates and the impact of, for example, life expectancy we would also highlight a number of factors to consider from the recent 2017 Health profile for England : - Life expectancy continues to rise, albeit at a declining rate, but the number of years spent in poor health is increasing. This will impact the need for particular housing, transport and service delivery solutions - The life expectancy gap between men and women is closing which may later affect the size of older person households over time - Deprivation and inequality continue to be key and enduring factors in poor health outcomes and so need addressing. Consequently access to housing and employment and the impact of spatial and economic planning on these factors needs consideration - There is growing evidence of the link between incidents of flooding (p.55) and poor mental health	Agreed reference made to charging points in new transport agreement. Point regarding urban design is a matter for local plans. Agreed to add demographic points to section 4.	Section 4 updated
BHLF-3C85-CAC5-Y	Norfolk County Council	- It is recognised (p.31) that affordability is a key barrier to accessing good quality housing. Given the proposed changes in some definitions of affordability within the White Paper² we would welcome some consistent approach across the county which would support adequate provision across localities and reduce the risk of development being piecemeal over geographic boundaries. - Given the pressures on the electricity and water infrastructures we would support a countywide approach to increasing capacity which minimises environmental impact through construction materials and processes, noise and loss of green infrastructure Without underplaying the importance of physical inactivity and smoking on causes of death (p.47) the 2017 state of England does introduce concerns about other factors, some of which may be ameliorated by spatial planning interventions. These include dementia and Alzheimer’s and poor diet. There are some links back not only to physical activity but also accessibility of affordable and good quality food. A county wide approach to land use and affordable fresh fruit and vegetables in particular would be welcomed - We would support use of the health Protocol, for example, to plan for and manage access to health care, although evidence suggests that other factors related to income, environment, education etc. are much more closely correlated to good health outcomes - Underpinning this response are some key themes around: - Air quality - Affordable and good quality housing - Physical activity and transport - Diet and access to good food - Employment for all - We would also welcome cross-authority consistency on some of these key measures to reduce the risk of developments varying within the county and therefore impacting populations in different ways or enabling activity to pick locations where the health requirements are seen to be of a lesser order."	First point affordability issues are best dealt with in local plans because needs and viability vary from district to district. Support for the health protocol noted and other issues are already covered by the NSF where appropriate. There is no evidence the final point will be a significant issue	No change to NSF
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Health: APC agrees that there is a desperate need for a new protocol on planning of health services and would ask that anything that can be done at a national level to make implementation mandatory, this be pursued	Noted	No change to NSF
BHLF-3C85-CAC8-2	Suffolk County Council	It is noted that Norfolk County Council is preparing an Infrastructure Delivery Plan and it would be helpful to engage at an appropriate point in this with the Suffolk LAs to consider whether there are wider issues that need to be dealt with together. There could usefully be reference to this within the Framework. ³	Agreed	No change to NSF
ANON-3C85-CAXF-5	No to Relay Stations	I repeat what I said earlier. There needs to be protection for all landscapes, not just 'protected' landscapes. Not everyone has the time or money to join conservation groups and visit reserves. Although I am a member of the Norfolk Wildlife Trust I have a rich variety of wildlife on my doorstep, easily accessible for example after I was recovering from injury. This landscape and this wildlife is at risk - and yet this is the kind of environment that most people can enjoy for free, and which enriches our daily lives. There is a short-sightedness which only places value on specific areas. It is the day to day quality of life of ordinary people which should matter, not just protection of the Broads and other designated areas	The same point was raised by Natural England and their wording has been used.	No further change to NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	The Somerleyton Estate would also like to see a strong case made for the Norfolk local authorities working with peripheral farmers and landowners like us to create an attractive accessible 'living landscape' around towns such as Great Yarmouth working closely with or being led by Norfolk Wildlife Trust and to an extent the Broads Authority National Park – much as the manner of Suffolk Wildlife Trust does at Carlton Marshes. The Somerleyton Estate believes that Great Yarmouth has traditionally looked out to sea but it also needs to look inland too and celebrate and breathe life and environmental protection into the Yare river valley, marshes and arable hinterland. The Somerleyton Estate is well positioned across both counties to assist the Norfolk local authorities and Great Yarmouth in particular in developing this strategy and would like to do so	Noted	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	The document should clarify what is meant by ‘protection and maintaining the Wensum, Coast, Brecks and the Broads’ and why these areas are significant. If the reference is targeted at designated sites of most significance to Norfolk e.g. Area of Outstanding Natural Beauty, National Park and European designated sites, these should be referred to in the appropriate context. The NSF should be specific that the GI network will also require enhancement in order to support growth	Agreement 20 will be updated to clarify.	No further change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	Hoveton Parish Council believes the locations of these extra stations should be carefully and sympathetically chosen so as not to adversely impact on local landscapes or quality of life.	Noted	No change to NSF
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Light pollution: the Council would like to see this added as it feels the current level of planning and environmental health legislation does not sufficiently cover the problems of the countryside. ⁴	Light pollution is not a matter that the NSF can address	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	In the Appendix comments relating to page 58 of the NSF, a Member asked that consideration be given to including reference to the tributaries of the Wensum	The specific reference to the Wensum is in recognition of its international importance	No change to NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	Comments about Section 7 - Infrastructure and Environment In Section 7 ‘Infrastructure and Environment’ a number of strategic objectives are proposed under separate sub-headings. As with our comments on Section 2.3 set out above please add the following bullet points under the sub-headings in Section 7: “To realise the economic potential of Norfolk and its people by:” • Supporting the County’s tourism offer and the environment upon which it relies. “To reduce Norfolk’s greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change by:” • Supporting and facilitating indigenous tourism development. Also in Section 7 under the sub-heading “To improve and conserve Norfolk’s environment” the following bullet point objective is noted as particularly important by the Somerleyton Estate in protecting assets such as the Fritton Lake Resort: • “Protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements”.	No specific sectors are addressed in the vision and objectives however it is agreed to enhance the tourism reference in the economic section.	Tourism Reference added in Economic Section

BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	It would improve presentation if sections on Infrastructure and the Environment were separated – the Transport elements of Sections 7.1 and 7.7 seem to fit more logically alongside the presentation of the economic growth framework and connections. ~~Footnote 37 refers to current and future travel times for Norwich – London. It would be helpful to see comparative figures for Kings Lynn – London.~~	While they could be separated they have been combined to highlight the importance of GI as a type of infrastructure	No change to NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	In Section 7.1 ‘Introduction’ the Somerleyton Estate points to a statement which is of significant importance to them where it states: “As is reflected in the introductory text in this framework and is recognised in the agreed vision and objectives the future economic and social prospects for the County cannot be divorced from issues of environmental protection and infrastructure provision. The quality of Norfolk’s environment, both in terms of the countryside, it’s historic City and the wide range of distinctive towns and villages it includes, give access to a quality of life which is one of the key selling points of the County and the retention and enhancement of which will be crucial to attracting the growth in highly productive economic sectors that is sought”. The Somerleyton Estate request that this section is highlighted because of its significance to maintaining the visibility of the tourism sector to the Norfolk Local Authorities.	Based on comments received references to tourism have been changed within the Economic section of the NSF. However Norfolk's environment plays an important role in all types of economic development not just tourism.	No further change to the NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	In Section 7.8 ‘Flood Protection and Green Infrastructure’ and under the sub-heading ‘Green Infrastructure and the Environment’ the Framework states that: “Green infrastructure is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of economic, environmental and quality of life benefits for local communities. The provision of green infrastructure in and around urban areas helps create high quality places where people want to live and, work and visit. New GI can also mitigate impacts on existing sensitive sites.” The Somerleyton Estate wholeheartedly supports that statement and requests the minor amendments as set out above. Further in this section the Somerleyton Estate again wholeheartedly support the section which states: “As Norfolk grows considerable investment in the provision and maintenance of a GI network will be needed in order to facilitate and support growth whilst also: • Minimising the contributions to climate change and addressing their impact; • Protecting, managing and enhancing the natural, built and historical environment, including landscapes, natural resources and areas of natural habitat or nature conservation value; • Ensuring existing and new residents receive the health and quality of life benefits of good green infrastructure; • Maintaining the economic benefits of a high quality environment for tourism; and • Protecting and maintaining the Wensum, Coast, Brecks and the Broads.” This is precisely the message which the Somerleyton Estate wishes to see threaded throughout relevant sections of the Framework as discussed above.	Support Noted	No change to NSF
ANON-3C85-CAJF-Q	Resident	Social Infrastructure - health and education - under health provision there is no mention at all of access to health services, and for many this is a current and growing problem which will worsen over time. This arises from the confluence of NHS centralisation of health provision whilst at the same time the reduction of (particularly) bus services in the county due to funding constraints. Not mentioning it does not mean that it is not an issue, nor does it mean that the issue will disappear and the section needs amendment to include reference to it, and to indicate the planning authorities' view of how to lessen the extent of the issue.	Noted the health protocol aims to help address these issues.	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	6 Social infrastructure: we note the sections on education and health. Improving educational standards is essential to supply a more qualified workforce and this is especially so in West Norfolk which lags in aspiration and attainment standards. We are concerned that the growing aged population in West Norfolk is already having greater difficulty in accessing health services, and NHS continually centralises these facilities and at the same time transportation services are in decline, especially in rural areas	Concerns Noted	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	Hoveton Parish Council is also concerned that any future proposals for housing development should take into account the impact these developments would have on social infrastructure. The Parish Council supports the idea that ‘health and wellbeing of the population’ and health infrastructure should be considered in planning decision making. Hoveton’s medical centre and other local healthcare services are already under pressure, and a population increase from further housing development would only exacerbate the problems being experienced by local residents when trying to access timely, quality health care. Similarly, an increase in demand for places at local schools will prove unsustainable unless a sufficient supply of school places goes hand-in-hand with housing development.	Noted this is a matter for local plans (for discussion with North Norfolk DC and Greater Norwich Partnership).	No change to NSF
ANON-3C85-CA8D-3	Norwich Cathedral	Whilst it is good that there is an emphasis on promoting tourism and heritage and improving infrastructure, thought also need to be given to what happens when tourists arrive In particular Norwich is very poorly served for coach parks and we struggle to attract coach parties because of this and those that do come frequently complain and the lack of adequate coach parking. Similarly we regularly receive complaints about poor signage both for motorists within the city and pedestrians. Infrastructure plan needs to think not only about overall connectivity but also how people will be handled when they arrive at their destination otherwise this produces huge frustrations and then makes people wish they had not travelled	Noted. Issues for the Norwich Area Transportation Strategy (NATS) review and City Council planning department	No change to NSF
ANON-3C85-CA8T-K	Hockering Parish Council	Public transport should be developed instead of building new roads and destroying the environment.	Noted. The NSF recognises that there is a need for both strategic road and public transport improvements.	No change to NSF
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	To improve the quality of life for all the population of Norfolk by: ensuring new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure; his aim contradicts the earlier aim copied below: To reduce Norfolk’s greenhouse gas emissions as well as the impact on, exposure to, and effects of climate change by: locating development so as to reduce the need to travel; ~~Reducing the need to travel necessitates new housing around large towns and would damage rural communities~~	These aims are considered to be compatible and reflect national policy. The approach does not prevent an appropriate scale of growth in rural communities, reflecting the availability of local services.	No change to NSF
ANON-3C85-CAXS-J	Resident	The missing NDR link must be built to achieve the full purpose of the road. The main spur roads out of Norwich eg to Cromer must not be overlooked. Workers and ambulances need faster routes from the rural areas.	Support for Norwich Western Link welcomed. Suggested needs for other improvements noted for consideration in future review of the Local Transport Plan.	Norwich western link to be considered in transport agreement in future version of the NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	All the proposed new housing brings with it an increase in traffic. You can't have it both ways. More people and less pollution does not work	Noted. Planning seeks to balance these issues and reduce the impacts of needed growth	No change to NSF
ANON-3C85-CAXA-Z	West Suffolk	West Suffolk supports the approaches advocated by the Norfolk Strategy Framework. We look forward to working together to achieve growth and consider that developments around the A11 would be best achieved after improvements are made to the A11 Fiveways junction.	Support welcomed	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited supports the identification of the Attleborough Link Road in the Priority Road Projects for Promotion (Table 12). If public funding is secured, the Link Road will be able to be delivered earlier than would be the case is funded through the proceeds of development alone.	Support welcomed	No change to NSF
BHLF-3C85-CAJB-K	Fen Line Users Association	Table 11: Committed Transport Projects We note and support the inclusion of the “half-hourly” King’s Lynn-King’s Cross Government franchise commitment in note 52 at the foot of this table. The comments above on Section 5 are made in the context of seeking the earliest delivery of this commitment. We request that the County Council includes in the Table details of Network Rail’s current King's Lynn-Cambridge 8-car scheme which, as well as doubling the number of seats per train (446 in an 8-car class 387/1 train) will permit currently overcrowded King’s Lynn-King’s Cross trains to stop at the new Cambridge North station (as noted in the text in Section 5). Details can be found at: https://16cbgt3sbwr8204sf92da3xxc5m-wpengine.netdna-ssl.com/wp-content/uploads/2017/06/Enhancements-Delivery-Plan-June-2017.pdf (page 33 of 189). Table “93” [13?] Priority Rail projects for promotion We note the inclusion of the Ely Area Enhancements in this table. This scheme is necessary but not sufficient for the introduction of the King’s Lynn-King’s Cross “half-hourly” service as well as to other rail service improvements. You will know that the Greater Cambridge Greater Peterborough LEP, the New Anglia LEP and the Strategic Freight Network have allocated £8.8m for feasibility studies to GRIP 3a in order to permit the earliest go-ahead of these works in CP6 (Growth deal 3 funding refers) and we request that this information be added to the notes to this Table. You will also note that the Secretary of State intends to issue the Statement of Funds Available (SOFA) for	NSF has been updated to include information on the King's Lynn-Cambridge 8-car scheme.	NSF has been updated to include information of the King's Lynn-Cambridge 8-car scheme.

BHLF-3C85-CAJD-N	Resident	Page 53 – Table 12 lists solely road projects. Are there also millions of £s proposed for cycle networks? I cannot find any reference yet they are essential. Firstly, is there reference elsewhere in the document to the provision of cycling infrastructure? And secondly has any account been taken of the government’s new Cycling and Walking Investment Strategy? To give a simple example, I would love to cycle from Sheringham to Cromer, but certainly not along the A149, which would be 4 miles. Instead I would have to use country lanes on a circuitous route of 10 miles. Hardly appropriate if encouraging people to cycle to work instead of driving. There is a coastal path between the two towns yet coastal paths generally are being provided/improved without any thought being given to making them cyclable as well. No joined up thinking!	Support for cycling is welcomed. However, outside of the Norwich area, cycling is not a strategic cross boundary issue. Matter for Local Plans and the Local Transport Plan	No change to NSF
ANON-3C85-CAJG-R	Resident	The document fails to recognise that North Norfolk only has substandard A roads. It takes about an hour to access any dual carriageway route. The poor quality roads increase local flooding and cause increased damage to cars. The increasing risk of hitting deer due to rising numbers must be considered. Access must be improved including to rail stations and airports beside Norwich. All residents must have access to the same high quality broadband and mobile phone facilities, not have to pay the same charges to receive substandard service. North Norfolk requires affordable public swimming pool and gym access like other parts of the county so full time residents can undertake sports which improve heart rate etc at all times of the year. The NDR must be completed to provide access from Dereham, Fakenham and Swaffham. Housing design must allow proper maintenance and fire protection. The new developments of block work and cladding must be reviewed considering the likely twenty/thirty year maintenance impact. The county’s planners must work with developers to encourage the building of more suitable properties for retired people and second home owners, including considering the parking and garden requirements. North Norfolk towns and villages are suffering increasing parking problems when second homers and tourists are about.	Noted. Local Plan issues	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 7.7 - ideally we should be aiming at building an west east rail line from Peterborough via King's Lynn, Fakenham, Norwich to Great Yarmouth and Lowestoft. Where large scale housing is to be developed as at West Winch, an efficient reliable transport system should be integral with the design to take residents to places of work, shopping complexes and town centres. The sand line could be used from King’s Lynn town centre to the A149 and then it could turn southwards past the Hardwick Industrial units and then through all 3 sections of the new development. This could be a tram or light rail system. Increasing the traffic around the Hardwick interchange and the congestion in King's Lynn town centre is not a sustainable policy. The A10 relief road should start near the junction with the A134 and then go over or under the A47 to then link with the A148 /A149 further north because a large amount of the traffic on the A10 is destined for the North Norfolk Coast. Such a design avoids the need for costly disruptive alterations to the Hardwick interchange. There is a group investigating the feasibility of re-instating the rail link between Hunstanton and King's Lynn using some but not all of the previous track bed and that it also seem sensible to safeguard the former trackbed from Heacham to Wells which would make an idea tourist route for walking and cycling.	For the New railway line as proposed there is no evidence that this proposal is feasible. Other comments noted - local plan issues.	No change to NSF
ANON-3C85-CA6U-J	Resident	Norfolk suffered particularly badly in the railway cuts of the 20th Century (Beeching 'Axe'). What are you going to do to press for reopening of railway routes if as you state in the document you are "effecting a major shift in travel away from car use"? I have personally witnessed the parking crisis where the experience of visiting any Norfolk town is let down by the enormous number of motor cars clogging up the streets. There are no places left to park. So I take the bus, but public transport is woefully inadequate and it does not connect with the rail services, particularly in North Norfolk e.g. at Cromer and North Walsham stations.	Noted. Local Transport Plan issue	No change to NSF
BHLF-3C85-CA6D-1	Middleton Parish Council	The Council generally felt that the Framework is very well thought out and tries to consider all aspects that can affect growth and development within Norfolk with a positive approach. However, there appears to be a lack of consideration or investment in the growing use of the A47 between Norwich and Kings Lynn. The improvement of the Hardwick junction only will not deal with the additional traffic using the A47 or the holiday traffic going to Hunstanton which blocks the junction every year. ☹️	Support welcomed. A47 improvements are supported by all the authorities (through A47 alliance) and will be specified in new transport agreement.	A47 to be considered in transport agreement in future version of the NSF
ANON-3C85-CA62-F	Resident	Under "Improvements Needed", you list "Norwich Western Link". This should be removed. ☹️ It would complete the encircling of Norwich with roads and concrete and would sever cycling routes out of the west of the city and cause severe damage to the Wensum & Tud valleys and surrounding areas. ☹️ Building a "Norwich Western Link" would have a further negative effect on the quality of life for city residents and is in complete opposition to the stated aims of "locating development so as to reduce the need to travel" and "effecting a major shift in travel away from car use towards public transport, walking and cycling". ☹️ With limited budgets, money should be diverted from the road projects listed to railway improvements, otherwise the car will continue to dominate Norfolk at the expense of public transport. ☹️ Figure 11 illustrates how Norwich is being cut off from surrounding green spaces. There are several "Accessible Nature Sites" just north of the city but the route of the NDR and the spread of Housing Allocations around its route block off access by cycle from the city to these sites. ☹️	The Norwich Western Link is a County Council priority and supported by the local planning authorities. The design of any scheme will need to take account of the needs of cyclists and the local environment.	Norwich western link to be considered in transport agreement in future version of the NSF
ANON-3C85-CAJF-Q	Resident	The analysis of current infrastructure makes no reference to the planned worsening of the Fen Line rail service to and from Norfolk nor the A17 main road linking Norfolk to the North Midlands and North of England. These are major deficiencies in the analysis and therefore the conclusions and actions do not accord to the full current situation. ☹️	While any deterioration of service is regretted it doesn't alter the overall approach to the NSF however mention of the A17 is included in section 3	Mention of the A17 is included in section 3
ANON-3C85-CAJF-Q	Resident	Local Buses: The generalised outcomes of the framework agreement between local planning authorities, either deliberately or otherwise, puts local bus use at the forefront of its vision to create housing and jobs growth but without consequential private car use growth. If bus use is to grow then the bus network has to be dependable, stable and attractive, and that it is not. The document does not address the issue of intervening in the market under the 2000, 2008 or 2017 Acts (yet implicitly rejects the much more limited interventions available under the 1985 Act) and unless it does so, then the vision will not, and cannot, be delivered. This is a massive failure to link inputs with outcomes and undermines the credibility of the document, probably more than any other omission. Local Buses: The analysis is deficient in that it does not use available data as a basis for the work as travel data is available to local authorities under the 2008 Local Transport Act and cannot be denied it by bus operators as if commercially confidential, and indeed that clause of the Act was specifically to enable high level strategic planning such as this document. The narrative needs rewritten based on the available evidence base rather than a series of generalised assumptions. Local Buses: Reference is made to Community Transport, implying that it will be a potential way ahead for rural transport provision. Yet in late July 2017 the Department for Transport issued a "re-interpretation" of the 1985 Act (to be consulted on this Autumn) which may end the use of community transport as a provider of rural bus services. This has the potential to cause significant social and economic detriment in a rural county such as Norfolk.	Noted, detail is a matter for Local Transport Plan	No change to NSF

ANON-3C85-CAJF-Q	Resident	Rail: The narrative inaccurately describes the London to King's Lynn service currently as half hourly at peaks. It is not so in the afternoon peak, not at all from Cambridge northwards and from London the half hourly service is from 17.44 to 19.44, largely post-peak. This leads to severe overcrowding on the Fen Line north of Cambridge which is not considered in the document nor any agreement made to address it. Rail: The narrative is out of date in that train seat capacity on the Fen Line has been deliberately reduced from May 2017 by the allocation of newer stock, reducing seats from approx. 245 to 210 per train. This has significantly worsened peak hour overcrowding (ie beyond standing capacity) on Fen Line trains North from Cambridge during its afternoon journey from work peak. Rail: Journey times to other towns off the rail network are considered (Figure 4 of NSFTT) as rail plus car overall time. The analysis does not include either the variable locations of car parking facilities around the King's Lynn gyratory nor the closure of ticket office facilities at that station recently, the combined effect of which is that, for example, from Hunstanton, the road journey time at 30 minutes is grotesquely understated compared with reality - most people would allow that for the road travel journey plus the same again for the variability of where in the town to find car parking plus the variability of queue time to buy a ticket (including from the vending machines when the office is closed). This therefore understates the extent of isolation from the national network suffered by some of these towns and therefore enables the planning authorities to avoid making any agreements on the extent to which there is a case for land protection for possible new rail lines as the population and local economy both grow, bringing with them an exponential rise in the demand for travel (despite the lofty ideals of the plan to reduce it). Rail: The NSFTT SWOT analysis at Figure 5 includes no reference to the inadequacy of capacity on the Fen Line nor the planned downgrading of other aspects of the Fen Line service from December 2018 as threats, nor the opportunities that arise from putting this growing list of deficiencies on this line right. Outcomes and policies emerging from the SWOT analysis will therefore be deficient and this needs rectifying. Rail: Footnote 52 indicates a rail journey time from King's Lynn to Cambridge of 45 minutes. That it used to be but currently it is 48 minutes and planned to increase to just under 1 hour from 2018. This is considerable worsening that will depress demand for rail and economic growth and create modal transfer towards car in total ~~contravention of the lofty ideals of the framework document. Yet the document is silent on this.~~	While any deterioration of service is regretted it doesn't alter the overall approach to the NSF, the detail will be considered through the Local Transport Plan	No change to NSF
ANON-3C85-CAJF-Q	Resident	Roads: as noted above, there is no recognition of the A17 as an important road for the county's business success, even though all but the first seven miles lies beyond the County boundary. This needs to be put right in the document and in doing so consideration given to the complete inadequacy of the road capacity for current, let alone future demand. Roads: it is noted in the supporting evidence (NSFTT, Figure 2) that average speed comparisons on trunk roads exclude A17 and A47 West from King's Lynn yet these are important to the county's connectivity. Average speeds in West Norfolk are below the rest of the county and yet very little strategic improvement (as different from individual local schemes) is focused on this area. This is a failing of the document and should be addressed. Roads: It is noted in the supporting evidence (NSFTT) that there are 2 congestion hotspots in West Norfolk and only one in a selection of a few other towns and cities (for example just one in Norwich). Yet the road network development plans focus on further infrastructure investment mostly excluding West Norfolk. If the funding does not follow the evidence trail then there is little purpose in writing and working to the document and the planning authorities should reconsider and rebalance this proposed	Noted, detail is a matter for Local Transport Plan	Mention of the A17 is included in section 3
ANON-3C85-CAJF-Q	Resident	Air Quality: quality issues in Norwich and King's Lynn are noted. In Norwich one central area is pinpointed and an action plan in development to address it. In King's Lynn there are two areas of concern (including the suburb of Gaywood) and plans are currently under consideration that have the potential to worsen it in other residential areas as well (the opening of part, and then all of Harding's Way to all traffic) so that the worst air quality in the county will be in King's Lynn. Yet the document proposes no action plan to address it. This needs to be amended and a commitment to urgently developing a plan to deal with it. Further, it makes the case for a general agreement across the authorities to not proceed with any plans that will knowingly worsen air quality.	Air quality management areas are not strategic cross boundary issues	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	Table 107; We note that two projects are included. Why these two projects? Are there others that need to be included? For example Sustrans are already promoting a pilot signage project in this area and NCC as highways authority, has been investing in 3Rivers Way to boost cycling network.	These are the projects that have been put forward through the infrastructure delivery plan, additional projects can be considered in future versions of the NSF and IDP.	No change to NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	This focus on the County Town is also reflected in comments about roads. The prosperity of the region depends on getting goods and services into the County, yet, again, all road spending is focused in the East. Kings Lynn is now a bottleneck all year round, not just during the holiday season. Tourism is one of Norfolk's biggest sources of income, yet we are now hearing people saying they will not come again due to the delays on the roads – not the ones in the immediate environs of resorts, which may be expected, but those en route. This is before 1,000 houses, which have been given planning permission in just the last three years, are added on the A149 alone.	Noted the schemes reflect the needs identified by the transport authorities in consultation with the district councils.	No change to NSF
BHLF-3C85-CA6H-5	Melton Constable Trust	I write on behalf of the Melton Constable Trust which for many years has been actively pursuing the prospect of bringing back regular rail services to places such as Dereham, Fakenham and Holt by use of the existing heritage lines and existing Network Rail routes. To this end we have commissioned feasibility studies and purchased land at both Holt and Fakenham. As has been shown elsewhere in the country, we believe that this could make a massive contribution to the local economy, help address road congestion, be a further boost to tourism and help tackle rural isolation.☹ ☹ To this end can we please suggest that there is a positive reference in the document to continuing support for the Bittern and Wherry lines and support in principle for the reconnection to the main network to Dereham, Fakenham and Holt ?☹ ☹ ~~The inclusion of Fakenham, Holt and Melton Constable in the framework document for the first time is a welcome development.~~	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	2 In this context, the failure to understand and recognise the transport infrastructure shortcomings in West Norfolk is disappointing. The A17, the major link from Norfolk to the North of England, is not mentioned once in the document, and there is scant comment on any shortcomings on the A10 from King's Lynn to Cambridge (save for the fact that Cambridgeshire County Council is studying what to do in its section of this road) nor the A47 West from King's Lynn to Peterborough and the A1. Additionally, whilst much is made of the rail investment in the County by Abellio nothing is said of the continual downgrading of service by Great Northern on the Fen Line serving West Norfolk. The NSF therefore needs major rewriting to recognise the very different transport infrastructure shortcomings and needs in the West of the county to ensure that its population and economic development are not 'left behind'.	Noted the schemes reflect the needs identified by the transport authorities in consultation with the district councils. While any deterioration of train service is regretted it doesn't alter the overall approach to the NSF.	Mention of the A17 is included in section 3
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	11 Transportation - servicing new developments: the NSF is largely silent on this issue, except to note that planning authorities have no legal right to require minimum broadband speeds to be delivered to new developments. It is possible, through a raft of available interventions, however, to intervene when new developments are planned, to provide appropriate local bus services which accord with the NSF Vision and Objectives. These can be by using the Acts noted above, or at a smaller scale by Section 106 or 272 agreements with developers, or through a CIL or development Levy. The NSF must be more explicit about these, how authorities would intend to use them, and include a template (section 106 for example) agreement, so that businesses and developers can have certainty that these interventions will be used and the ~~outcomes of the intervention~~	These are not matters for the NSF as they are not strategic cross boundary issues	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	10 Transportation - local buses: the NSF Vision and Objectives makes the clear desire and commitment to improve connectivity between where people live and where they work and use other facilities (such as retail and education) and to create a modal shift from car towards public transport, cycling and walking. The major component of this shift is to ensure that the local bus service meets this vision and objective so that they are deliverable. But local bus services are privately provided and business owners have clear legal objectives to maximise shareholder value, not community or society value. As a result, the vision cannot be delivered without interventions in the free market. These interventions are permissible in Acts enacted in 1985, 2000, 2008 and 2017, and each Act has made it easier for the transportation authority (NCC) to intervene than the previous one. For the NSF Objectives and Vision to be fully realised, and the county's population and economy to reach their full potential, the NSF must actively discuss and make agreements on how, not whether, it will intervene, and to show how the intervention will meet the Vision and Objectives of the document. Leaving it to the market, as now, will no longer be an appropriate solution.	Noted, detail is a matter for Local Transport Plan	No change to NSF

ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	9 Transportation - rail: the NSF narrative applauds the growth in rail passengers and the investment made and to be made in line upgrades and new stock in the new Greater Anglia franchise. We welcome these investments. However, they are in stark contrast to the decline apparent on the Fen Line in West Norfolk, a line with a recent past passenger growth rate above that in Greater Anglia and the national average and yet which has (a) had lower capacity trains put on the route in May 2017 and (b) faces a planned significant slowing down of journey times from December 2018. This has resulted in grotesque overcrowding North from Cambridge during its afternoon peak travel time and will result in the franchise requirement set by the Department for Transport not being complied with in terms of maximum journey times from next year. Yet the NSF makes no reference to these downgradings, nor the fact that the December 2018 timetable fails to meet the rail industry's objectives for half hourly afternoon peak travel time trains from next year (let alone its failure to meet the franchise requirement of daytime half hourly trains from 2017). The NSF must be rewritten to be more robust in its commitment to work tirelessly with the rail industry to put right these failings as priority two (after Norwich in Ninety is delivered) and before aspirational new links are implemented such as Norwich to Stansted Airport direct services.	While any deterioration of service is regretted it doesn't alter the overall approach to the NSF	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	8 Transportation - air quality: two areas of air quality concern are noted in the NSF, one in central Norwich for which there are plans to address the issue and the other in the King's Lynn town centre stretching out to the suburb of Gaywood for which no plan is included to address the issue. The NSF must be rewritten to include a commitment to addressing this issue at an early date. Indeed, to the contrary, West Norfolk is considering opening to all traffic King's Lynn's only bus priority road, which will potentially significantly worsen the air quality in South Lynn, thereby widening the are in which there is traffic generated health concern.	Air quality management areas are not strategic cross boundary issues	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	7 Transportation - roads: we have noted above the failure to properly assess the shortcomings and future needs of the infrastructure in West Norfolk, and ask that the NSF is rewritten to provide a proper and fair balance of investment, given the historic lack of investment in this part of the county. We note from the accompanying NSFTT document that (a) average road traffic speeds are lower in West Norfolk than the county or national average and (b) that there are two recognised congestion hotspots in West Norfolk compared with three for the rest of the county including only one in Norwich. We are concerned that both these features depress economic activity and business investment and also note that the NSF includes no plans to deal with these West Norfolk issues. We therefore believe there is a compelling case for the NSF to be substantially rewritten in respect of road investments	Noted, detail is a matter for Local Transport Plan	No change to NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	In section 7.7 'Transportation' in Table 12 the Framework lists a number of priority road projects for promotion. The Somerleyton Estate support the inclusion of the Great Yarmouth third river crossing and the A47 Acle Straight Dualling but, reflecting our comments above, such projects need to be considered alongside initiatives to support town centres such as Great Yarmouth so that footfall is directed into them rather than away to out of town retail parks.	Noted	No change to NSF
BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	Statistics reveal that the north of the County is almost totally dependent on road-based travel for most journeys – and yet there is only limited evidence / published data available to support transport assessments. Consequently the evaluation of impacts relies on developer submissions intended to support development proposals. Can the NSF provide background information on road traffic flows and forecasts of traffic growth? This is a particular issue along the A149 Coast Road which suffers massive fluctuations in seasonal traffic and is destined for significant housing growth in the Hunstanton area - a clear obstacle to those wishing to access employment opportunities along this route and especially in the larger towns (maybe developers could fund the costs of an independently developed transport model or CIL could be hypothecated to pay for this?)	Noted, these are matters for the Local Transport Plan or local plans.	No change to NSF
ANON-3C85-CA3V-G	Resident	With regard public transport, the downside of improving rail services from Norwich is an inevitable increase in car journeys into Norwich to connect with those services. The Bittern line (more than Yarmouth and Lowestoft where there is the facility to get to London more readily without going to Norwich) will currently be saving many car trips into Norwich daily by those going to London (and the Midlands). It is frustrating that other towns with similar needs, notably Fakenham and Dereham, have no corresponding facility and, whilst recognising the likely difficulty of restoring rail services to them, I would like to see the strategy at least acknowledging that possibility and the need to assess viability (and the possible consequences).	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CA3T-E	Norfolk Orbital Railway	I am interested in reinstating 'some' redundant railway routes in Norfolk, in particular the Fakenham to Dereham route with longer term aspirations to get from Fakenham to Holt creating the Orbital route: http://norfolk-orbital-railway.co.uk/say-norfolks-shared-vision-development-including-transport/ Have your say on Norfolk's shared vision for development including Transpor... Norfolk councils are asking residents for their views on a joint vision for the county's future to 2036 and beyo... A site for a railway station at Fakenham is with North Norfolk District Council, please scroll down to 2a Fakenham. the area in yellow towards the bottom of the map is the protected railway route : https://www.north-norfolk.gov.uk/tasks/planning-policy/view-proposals-map/ The route from Fakenham to County School where the Mid Norfolk Railway runs to the mainline at Wymondham is protected at Norfolk County Council level: Safeguarding Land for Sustainable Transport Uses 3.5.22 The likely availability and use of public transport is a very important element in determining planning policies designed to reduce the need for travel by car. To this end, national policy requires local planning authorities to explore the potential, and identify any proposals, for improving public transport by rail, including the re-opening of rail lines. Such routes could also provide walking and cycle routes as an interim measure prior to the introduction of rail services. 3.5.23 Whilst the Government recognises that road transport is likely to remain the principal mode for many freight movements, it considers that planning policies can help to promote more sustainable distribution, including where feasible, the movement of freight by rail and water. Accordingly, it also requires local planning authorities to identify and, where appropriate, protect sites and routes, both existing and potential, which could be critical in developing infrastructure for the movement of freight (such as freight interchange facilities allowing road to rail transfer). 3.5.24 A potential link between the privately-run North Norfolk Railway and the national network across Station Road in Sheringham is protected. Such a scheme could enable railway services to operate between the outskirts of Holt and Norwich and would provide for a longer platform and improved customer facilities at Sheringham Station. Although the scheme is not identified in the Norfolk Local Transport Plan 2006-11, it would provide tourism as well as transport benefits. 3.5.25 The current Norfolk Railfreight Strategy promotes the re-use of the former rail corridor linking Fakenham with the Mid-Norfolk Railway at County School in Breckland District and beyond for both rail-passenger and rail-freight transport use. The route of this corridor insofar as it relates to North Norfolk District is protected from prejudicial development. The Norfolk Railfreight Strategy identifies sites in Cromer, Fakenham, Great Ryburgh, Hoveton and North Walsham where it wishes land to be safeguarded for use as rail-freight terminals through planning policy; the sites at Fakenham and Great Ryburgh being dependent on the previously mentioned reinstatement of the railway line between Fakenham and County School. Only the site at North Walsham, presently operates as a freight terminal. The land at Hoveton has more recently been taken off the protected list due to poor road access to the site and lack of facilities. Therefore this land is not protected by planning policy. Policy CT 7 Safeguarding Land for Sustainable Transport Uses Former railway trackbeds, and other railway land will be protected from development that would be prejudicial to the re-use of railway, or sustainable transport links and facilities in the following locations:	Noted	No change to NSF
BHLF-3C85-CA3E-Y	Resident	I wish to support the submission by the Melton Constable Trust. The reinstatement of rail services must surely be a priority . It will help reduce pollution and the movement of freight by rail would reduce the number of heavy vehicles. Not everyone has a car and rail access would bring great benefit to them , Other areas have begun to reinstate long lost rail services with great success and Norfolk should follow. A large rural county with so little rail access is surely not acceptable in this day and age.	Noted	No change to NSF
BHLF-3C85-CA3D-X	Other	Although I'm not resident in Norfolk I regularly visit the county and would like to visit more, but struggle to get to even the larger market towns as I am a non-driver. I would argue that Norfolk lost a disproportionate number of its railway lines under the Beeching cuts and consideration should be given to re-instating a number of these, particularly to towns like Fakenham and Melton Constable. I would suggest that offering greater connectivity, by rail, would significantly boost economic activity in the county.	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF

ANON-3C85-CA37-H	Other	When ever I use the Bittern line I'm always impressed by how popular it is. But I can remember when it came close to being closed. I'd like to see continued support for the local rail services.👍 I also think that, in light of ever increasing road congestion,that more support should be given to proposals to reinstate closed railways, like the orbital project and the link to Hunstanton. I know such things are expensive but I believe that every railway reopened has been more popular, and created more value, than expected.	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	One of the first local issues to be tackled by the Wroxham and Hoveton Joint Action Group is the increasing problem of traffic congestion on the A1151. This heavily-used main road runs through Hoveton and Wroxham; with a recent study carried out by Wroxham Parish Council showing half a million vehicle movements passing through the two villages in just over two months. There are many practical problems posed by such congestion – queues of traffic causing long delays in entering and leaving the villages, particularly at peak times (work commutes/school runs) and over the holiday season; difficulties for local residents in joining the main road traffic from driveways and residential roads; delays experienced by emergency vehicles, etc – but of particular concern is the noise and air pollution resulting from this level of traffic, which will have a serious impact on local quality of life. Hoveton Parish Council feels that further housing development in either village will only add to the already unacceptable congestion on the A1151, and will therefore further erode quality of life for local residents.	Noted, this is a mater for local plans.	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	As noted in its comments on Section 5, Hoveton Parish Council believes there is a need for the provision of local jobs in order for the local economy to thrive. It therefore agrees with proposals to ensure effective and sustainable digital connections and transport infrastructure between and within settlements, and to support employment allocations that minimise travel distance and maximise the use of sustainable transport modes, both of which would hopefully help to alleviate problems with local traffic congestion. There is also a demonstrable need for further investment in local road maintenance and ensuring that heavily-used roads such as the A1151 are fit for purpose.	Noted	No change to NSF
ANON-3C85-CA3C-W	Resident	As highlight in this paper, many upgrades are needed to the road network in Norfolk. 🙏 🙏The A47 upgrades will inevitably bring more traffic onto the A47 which, at peak times, is already congested. 🙏 🙏Putting in place new rail connections will ease the pressure on the road network, as well as providing a greener and more reliable transport link. For example a links ~~between Fakenham and Norwich, and Dereham and Norwich would prove undoubtedly beneficial (and potentially viable).~~	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	Te single carriage way road network serving most of the county is one of the key characteristics that make Norfolk so unspoilt and attractive both to residents and tourists. This should be approach creatively with much more consideration given than in the past through: a) trip reduction through planning for greater settlement self containment b) a multi modal movement proposition including the reinstatement of local rail c) land release to support multi modal and sustainable movement. A critical feature of Norfolk's geography is the very strong pull Norwich exerts on its extended hinterland to service jobs, culture , education and shopping. This is also relatively predictable in terms of timings - its has been characterised as a tidal flow morning and evening by planning officers. This offers an almost unique opportunity for Norwich - over other UK cities - to reinstate its local rail network as a key element of a sustainable movement provision. The list of key infrastructures fails to address this key opportunity. This should be rectified - not least in order to support the forms of sustainable growth sketched in the document as the aim of the growth strategy. We suggest the following should be considered included: - improvement in the frequency/capacity of the Bittern Line - tram/train connection between Norwich Business Park and Norwich Airport - reinstatement of the Marriott Way as either a light rail connection - investigation feasibility of connecting Marriott Way route to UEA and NNUH - Consideration of local rail connections between Wymondham and NNUH/UEA - North Norfolk Circular route - institution of rail based park and rides across the proposed local rail network Furthermore the list of infrastructure aspirations does not include the improvement of the Norwich-Cambridge rail connection. (While it does mention the Oxford-Cambridge connection- which has little or no bearing on Norfolk). This should be brought forward as a key priority servicing a potential step change in the economic potential of the County. All other movement priorities should be tested against the question of whether they enhance multi model and sustainable movement and place competitiveness on a 21st C not 20th C movement model. The funding model for infrastructure that is directly related to development should be reviewed against the alternative SLiIM business model which we have referred to previously which could potentially work in parallel to create long term value and returns. We would like to interrogate the background paper that is refrrd to below: "Furthermore, the background paper produced identified three key strategic issues affecting the County including: the relatively poor transport connectivity between our main settlements and destinations outside Norfolk resulting in long journey times; the poor connectivity within the County particularly for east-west journeys, exacerbated by congestion and unreliable journey times on parts of the network (especially the A47) adding to business costs; and difficulties in delivering major enhancements to transport networks within our urban areas and market towns which tend to have historical street patterns where the scope for major improvements is limited." the report ~~upon which this is based seems to make a fundamental mistake in iots assessment of the specific qualities of Norfolk its geographty and in its over-emphasis on connection~~	The majority of the schemes mentioned are matter for the Norwich Area Transport Strategy and the Greater Norwich Local Plan, there is currently no evidence that a Circular railway route is economically feasible for regular rail services. Norwich to Cambridge service improvement is a priority and this should be clarified in the NSF.	Mention of Norwich to Cambridge line improvements mentioned in section 3
ANON-3C85-CAC4-X	Stalham Town Council	In order to effect a major shift in travel away from the car towards public transport, then this needs to be greatly improved in North Norfolk. The lack of railway stations in North Norfolk does not help. Also, as mentioned in Section 1, a bus service that goes direct to Norwich Railway Station from Stalham would be of great benefit to the area.👍 Drainage of the roads needs to be improved to prevent continuous flooding when there are heavy rainfalls.👍 At present Norwich Airport provides a very limited service for Norfolk to other European countries, so I would suggest it would definitely benefit the county if this was greatly improved in the very near future.	Noted but these are not issues the NSF is able to address	No change to NSF

BHLF-3C85-CACX-2	Other	Please note that bringing back old train routes has now become popular in many parts of UK (chiefly for commuting and/or freight, not just heritage or tourism purposes). Please urgently view these websites:- a) https://www.change.org/p/government-reinstate-train-line-from-king-s-lynn-to-hunstanton?utm_campaign=fb_dialog&utm_medium=email&utm_source=signature_receipt#_=_ b) http://www.freightonrail.org.uk/ c) http://www.heritagetrains.com/index.php Action needs to be taken before new houses are built on these railway routes Please convey our thoughts to your decision makers If there is to be an East Anglian Powerhouse then our area should get equivalent government money:- to that being planned for the Northern Powerhouse to link Leeds with Manchester across the Pennines. We already have (thanks to forward-thinkers of the early 20th century) superb railway routes East- West in Essex and also across Norfolk. Why, for lorry traffic, waste funds dualling parts of the A47 causing clogging and new jams due to excess speed and essential new roundabouts? Such money should be spent on re-opening the East West lines for agricultural freight as well as for passengers. The rail lines never should have been closed. Such important very-much growing towns as Braintree (not far from Stansted), some suffolk towns, Kings Lynn, Dereham, Hunstanton have been cut off, and the opportunities for cheaper transit of sugar beet etc, and passengers lost for no good reason. There are similar east west tracks which could be opened on the Lincolnshire Fens to the east of Peterborough, where people have lobbied in vain for commuter "stops" to be re-opened. As at Narborough next to the main east west route being built on by Persimmon next to the railway line.	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
ANON-3C85-CACY-3	Resident	I would like to see a comprehensive review of the route hierarchy undertaken, that properly addresses the impact of HGV's and other large vehicles (including agricultural) on our village roads which are simply not able to cope with such traffic. Residents whether they live in a village or town, should not have to put up with vehicles mounting pavements, excessive noise because the road infrastructure is inadequate.	Noted, these are matters for the Local Transport Plan or local plans.	No change to NSF
BHLF-3C85-CACQ-U	Historic England	There are a number of major transport infrastructure projects on-going or upcoming within Norfolk. These are large projects, the details of which cannot be adequately considered here. We support a cross boundary strategic level consideration of transport infrastructure and look forward to being involved in specific proposals as they progress. All proposed transport infrastructure schemes and route options should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.	Noted	No change to NSF
BHLF-3C85-CAC9-3	Resident	With reference to your consultation on Norfolk's strategic development, I would like to point out that Norfolk needs railways, principally those which it used to have. Large towns are left without connection to the national network. It is ridiculous that there is no connection between King's Lynn and Norwich. Market towns such as Dereham and Fakenham now have no national connection. The Norfolk Orbital Railway offers a solution to the latter problem, and I would urge you to include them in your consultations. As to the former, there seems no particular reason why Network Rail should not be coerced into rebuilding the line from March to Lynn. It should also be considered whether there are places which were never served by railways which could now, because of increased housing, industry or tourism, benefit from railway access.	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CACH-J	Other	The levels of vehicle traffic seem to be growing alarmingly all over the county, and, indeed, over the country. There can be traffic jams and gridlock at any time, anywhere, and this is a really worrying trend. Congestion on this scale is simply a complete waste of time & resources, as well as a major contributor to air pollution. It is vital that we take action NOW to persuade people out of their cars for both business & leisure, and reduce greatly the use of road vehicles for "distribution". Therefore the NSF should quickly decide on urgent measures to deal with the over-use of motor vehicles, with a many-pronged attack, eg park and ride (at sensible times and fares, not just stopping at 18.00), and improving all transport routes and capacity, (over-crowded 2-car trains, or buses crawling through rush-hour towns on busy routes are not an encouragement for people to leave their vehicles at home). Also urge you to look most seriously and in detail at the Norfolk Orbital Railway which could be an excellent way of transporting tourists, and possibly goods, and could be linked into a coherent integrated county wide park-and-ride scheme.	Noted, these are matters for the Local Transport Plan or local plans. There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	Under 'Current Network'- the text says 'The A47 continues as the A12 trunk road from Great Yarmouth to Lowestoft'. Highways England have recently resigned this section of road as A47. The document could make reference to development and improvement of the Major Road Network (MRN) following the announcement from DfT to invest monies from road fund duty. (There are no specific schemes identified but we expect to be asked for funding bids within the next 12 months).	All references to A12 are updated in the NSF.	NSF Updated
BHLF-3C85-CACK-N	Hoveton Parish Council	One of the first local issues to be tackled by the Wroxham and Hoveton Joint Action Group is the increasing problem of traffic congestion on the A1151. This heavily-used main road runs through Hoveton and Wroxham; with a recent study carried out by Wroxham Parish Council showing half a million vehicle movements passing through the two villages in just over two months. There are many practical problems posed by such congestion – queues of traffic causing long delays in entering and leaving the villages, particularly at peak times (work commutes/school runs) and over the holiday season; difficulties for local residents in joining the main road traffic from driveways and residential roads; delays experienced by emergency vehicles, etc – but of particular concern is the noise and air pollution resulting from this level of traffic, which will have a serious impact on local quality of life. Hoveton Parish Council feels that further housing development in either village will only add to the already unacceptable congestion on the A1151, and will therefore further erode quality of life for local residents. As noted in its comments on Section 5, Hoveton Parish Council believes there is a need for the provision of local jobs in order for the local economy to thrive. It therefore agrees with proposals to ensure effective and sustainable digital connections and transport infrastructure between and within settlements, and to support employment allocations that minimise travel distance and maximise the use of sustainable transport modes, both of which would hopefully help to alleviate problems with local traffic congestion. There is also a demonstrable need for further investment in local road maintenance and ensuring that heavily-used roads such as the A1151 are fit for purpose.	Noted, these are matters for the Local Transport Plan or local plans.	No change to NSF

BHLF-3C85-CAJD-N	Resident	The Transport Constraints paper There is too much emphasis on transport improvements being about heavy infrastructure and little if anything about ‘lighter touches’. These include: •Cycle networks – you admit that “Networks have not been identified in most of the market towns and no audit of cycle provision has been undertaken”. But you do not say why not! •Traffic reduction •Travel Plans The policy context is now totally different to a few decades ago when new and improved roads were seen as the answer to traffic congestion. Now it is widely accepted that traffic expands to fill the available capacity and that you cannot build your way out of congestion. The case for sustainable travel and less travel is now generally accepted, yet your paper does not seem to recognise that. The facts are straightforward: •There is too much traffic. •Air quality is poor in places. The UK has had illegal air pollution in many places since 2010 and the government keeps being taken to court. This negligent attitude alone should herald urgent policies of traffic reduction. •Road casualties are not reducing since 2011. •Carbon dioxide levels are not falling enough, and transport is the reason. So the messages are loud and clear. You need a totally different approach and a pro-active one featuring Travel Plans, Park and Ride, cycle networks, car sharing, high quality bus services. I’m afraid your approach seems out of date. ~~The paper could usefully refer to the county council’s Transport Plan for 2036, ‘Connecting Norfolk’ and also what progress has been made on it since 2011.~~	Noted, these are matters for the Local Transport Plan or local plans.	No change to NSF
BHLF-3C85-CA6D-1	Middleton Parish Council	The Council generally felt that the Framework is very well thought out and tries to consider all aspects that can affect growth and development within Norfolk with a positive approach. However, there appears to be a lack of consideration or investment in the growing use of the A47 between Norwich and Kings Lynn. The improvement of the Hardwick junction only will not deal with the additional traffic using the A47 or the holiday traffic going to Hunstanton which blocks the junction every year.	Support welcomed, the A47 is a priority and will be considered in a new transport agreement, the issues around the Hardwick junction are scheme specific or relate to the local transport plan.	A47 to be considered in transport agreement in future version of the NSF
ANON-3C85-CA62-F	Resident	2. The document does not contain any means of encouraging or improving public transport, cycling or walking. This is a wasted opportunity.	There are largely local issues although their role will be considered in a new transport agreement	Public transport, cycling and walking to be considered in transport agreement in future version of the NSF
BHLF-3C85-CACP-T	Melton Constable Trust	I write as a supporter of the Melton Constable Trust which for many years has been actively pursuing the prospect of bringing back regular rail services to places such as Dereham, Fakenham and Holt by use of the existing heritage lines and existing Network Rail routes. To this end it has commissioned feasibility studies and purchased land at both Holt and Fakenham. As has been shown elsewhere in the country, it believes that this could make a massive contribution to the local economy, help address road congestion, be a further boost to tourism and help tackle rural isolation. To this end I would urge that you make a positive reference in the document to continuing support for the Bittern and Wherry lines; and support in principle for the reconnection to the main network to Dereham, Fakenham and Holt. ~~The Melton Constable Trust has been successful in securing a meeting with the Norfolk and Norwich Railway Society to discuss the possibility of reopening the line between Melton Constable and Holt.~~	The role of the Bittern and Wherry lines will be consider in the new transport agreement. There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	Bittern and Wherry lines to be considered in transport agreement in future version of the NSF
BHLF-3C85-CAC3-W	Other	Where Norfolk needs to focus is I believe mainly on transport. Please consider rail, in particular the heritage rail experiences offered by your three main railways all of which have a vision for the future that is progressing at only a snails pace. More should be done. Something also has to be done about the rail pinch points due to old bridges on the Norwich main line to London My second request is to ask for bypasses for some of the smallest most traffic jammed villages which spoil everyones experience of your great county. Cley being a case in point where this year I twice spent 30 minutes stuck in jams. My final request is the desire for more off road cycle paths. If only the wonderful north norfolk coastal path would also allow bikes it would add to tourism significantly. It is an underused resource that should have a wider group of users.	Noted. Matter for the Local Transport Plan	No change to NSF
BHLF-3C85-CACE-F	Resident	In view of the unstoppable growth of motor traffic in the County, I consider it essential to undo the mistakes of the 60's by protecting and improving the rail lines we still have, where possible reopening lines and stations to market towns which have been closed, and using lines for freight where such use has been discontinued. As such I applaud the efforts of the Norfolk Orbital Railway and the Melton Constable Trust and ask that all the former lines and accesses be protected against development so that such a circle is possible, probably not in my lifetime but we must plan for the Future when the oil runs out and abandon short-termism which is the bane of our Country.	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
ANON-3C85-CA31-B	Wroxham Parish Council	One of the first local issues to be discussed by the Wroxham and Hoveton Joint Action Group is the increasing problem of traffic congestion on the A1151. This heavily-used main road runs through Hoveton and Wroxham. A recent study carried out by Wroxham Parish Council recorded half a million vehicle movements passing through the two villages in just over two months. There are many practical problems posed by such congestion – queues of traffic causing long delays in entering and leaving the villages, particularly at peak times and over the holiday season, when the northbound queues regularly stretch several miles towards Norwich; difficulties for local residents in joining the main road traffic from driveways and residential roads; delays experienced by emergency vehicles, etc – but of particular concern is the noise and air pollution resulting from this level of traffic, which will have a serious impact on local quality of life. This is regularly brought to the attention of Wroxham Parish Council by Parishioners.	Noted. Matter for the Local Transport Plan	No change to NSF
BHLF-3C85-CACJ-M	Tunstead Parish Council	Also of concern are the road network and support for rural communities and rural services.	Noted	No change to NSF
BHLF-3C85-CACC-D	South Norfolk Council	Transport – Table 12 For the avoidance of doubt, Table 12 should be amended to say “A140 Long Stratton bypass (including Hempnall Crossroads improvements)” to reflect the fact that the crossroads improvements are considered by the council (as reflected in the Long Stratton Area Action Plan) as an integral part of the Long Stratton bypass project.	NSF updated to include Hempnall scheme	NSF updated
ANON-3C85-CA6U-J	Resident	Please see comments for Section 7. Norfolk has enormous potential for railway reopening as not many miles of the "lost routes".	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CA6K-8	Hunstanton & District Civic Society	Also under Section 7 - Infrastructure - It is essential to preserve through routes that have become redundant for their original use, ie rail track beds, canals, so that they can be used as footpaths, cycleways or possibly for re-instatement as public transport routes. There is a strong likelihood that the rail link between March and Wisbech will be reopened for passenger traffic. It is perverse that the former trackbed from Magdalen Road / Watlington to Wisbech has lost its protection because it could be developed into a through route at some time in the future.	Noted. Each route is a matter for the Local Plan	No change to NSF

ANON-3C85-CA31-B	Wroxham Parish Council	It seems inevitable that too much development will seriously harm the rural character of the local area. Wroxham Parish Council feels the fragile coastal, Broads and rural environment must be retained if it is to contribute to a strong and valuable tourist industry.⌚ ⌚ However we are mindful of the growth imperatives and targets of the Greater Norwich Growth Board (or it's successor) which will have a significant effect on our community and limited infrastructure. The Council feels that Wroxham, as it is structured today, cannot sustain continued development. A by-pass, as referred to in section 5, would not only alleviate the terrible traffic congestion and air pollution issues but also open up significant housing development opportunities throughout the by-pass corridor. It is unlikely that such a by-pass would start or finish in the parishes of Wroxham or Hoveton but significant social, economic benefits shall be derived from its construction to the villages and wider community.	Noted, these are matters for the Local Transport Plan and local plans.	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	Page 46 under 'coverage in Norfolk'. Weak rather than week.	Agreed	NSF updated
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	There are serious utilities, travel and environmental infrastructure deficits in North Norfolk and Broads Authority areas. These are being covered up by the utility providers by failing to reveal capacity and performance shortfalls at the Local Plan stage and by planning officers by failing to either recognise or hold fast to major constraints and exploit opportunities for developers to fund improvement or mitigation schemes. There are similar capacity deficits in drainage and flood protection systems especially in remote areas and small villages which have seen great population growth over the past 40 years.⌚ These deficits need to be identified and addressed by agreements to invest to increase capacity and overcome existing problems.	Noted - the authorities are continuing to work to address these issues	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	1 The NSF vision and objectives are to a large extent based on agreements to implement policies that improve connectivity to enable to economy to grow. It is therefore regrettable that transportation, still the backbone of connectivity and economic activity, is not treated separately from wider issues of investment in utilities and environmental considerations. We believe the NSF is weaker for this not being so.	A New transport agreement has been added to the NSF to enhance the transport section	New transport agreement added.
BHLF-3C85-CAJT-5	Catfield Hall	Consultation Response by Mr and Mrs Harris, Catfield Fen with input from specialist advisers on ecology and hydrology⌚ ⌚ Adequacy of Water Resources⌚ ⌚ These comments should be considered in the context of the European Habitats and Water Framework Directives which provide the legal framework for environmentally important sites such as Catfield Fen which are threatened by water related issues.⌚ ⌚ In section 7.4 “Water” on page 43 the following statement is made: ⌚ “Anglian Water’s Water Resources Management Plan to 2040 demonstrates how sufficient water for future growth will be provided and therefore water supply is not a strategic constraint to development.” ⌚ For the Norfolk Broads area this assertion is too optimistic, even facile, for the following reasons:⌚ ⌚ 1. The Anglian Water Resource Management Plan (AWRMP)2015 which is quoted, shows that the Norwich and the Broads area currently has, by some way, the highest water deficit area across the whole Anglian Water Region [see attached RZ(Resource Zone) Supply Maps for 2019-20 and 2039-2040 from the AWRMP which show a consistent deficit].⌚ ⌚ 2. Neither Anglian Water nor the Environment Agency in their recent publications have caught up with the implications for water abstraction in the Broads arising from the Catfield Feb Public Inquiry which were published in September 2016. Simply put these are:⌚ ⌚ i. Water abstraction was the probable cause of damage to Catfield Fen, a wetland of international significance with the highest levels of conservation designation, and abstraction should cease. This includes Anglian Water’s public water supply abstraction at Ludham. ⌚ ii. The monitoring systems used by Natural England and the Environment Agency were found to be inadequate in identifying the deleterious effects of abstraction on Wetlands. This conclusion has now been accepted by these statutory bodies which has clear implications for other wetlands in the Broads which are exposed to abstraction.⌚ ⌚ Catfield Fen was recognised as an important test case, as demonstrated by the need for a Public Inquiry, and its implications need to be considered (and applied) throughout the Broads where many fens have deteriorated in recent years. An Environment Agency map from its recent “water for life and livelihoods” publication is	The Catfield Fen public inquiry focussed specifically on two private water abstractions close to the fen. It is the Environment Agency who have extended the Inquiry decision to the Anglian Water Ludham source and have requested it to be moved. It has been programmed into AMP 6 (2015 to 2020) for appraisal of options to reduce and ultimately relocate the abstraction source. Closure of the current source is required during the AMP7 period (2020 to 2025). AWS are required under the Habitats Regulations to close the source as soon as practically possible. The monitoring systems used by NE and the EA are fit for the purposes for which they was installed – for the EA this was for constructing and calibrating the Regional Groundwater Model, not specifically for detecting and monitoring abstraction impacts on ecology within Habitats Directive sites. While some fens may be deteriorating, this could be down to one or more of many factors, including water quality and site management. They have not identified any other sites in the Broadlands area where abstraction is believed to be the cause of deterioration. At present the EA is concentrating it’s efforts on examining the Ant Broads and Marshes SSSI which is part of The Broads SAC (Habitats Directive site). We have no current plans to extend our assessment of abstraction impacts to other SSSIs, although we will guided by Natural England’s advice in this respect. Anglian Water have a statutory obligation under the Water Industry Act 1991 to propose appropriate supply and demand measures to ensure that they can continue to supply existing and new customers. Consideration is given to reducing the potential demand for water before proposing supply measures in their WRMP. It is acknowledged by Anglian Water that large AMP6 deficits are forecast in the Norwich and the Broads Resource Zone. The WRMP outlines the measures which are proposed by Anglian Water to address the projected deficit.	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	Also within this section, the commentary on Essex and Suffolk Water who are a provider of water is not included.	Agree, add reference to Essex and Suffolk Water	Reference to Essex and Suffolk Water added
BHLF-3C85-CA6A-X	Broads Authority	The same could be said of the water infrastructure. It notes that water resources will be stretched in meeting projected development but the emphasis on finding ways to strengthen water infiltration and its cross relationship with Green Infrastructure and the economic contribution of tourism is missed. Again, it might be implicit, but it does not draw out how problems can be addressed by suitable strategic planning in correlated issues.	Anglian Water have a statutory obligation under the Water Industry Act 1991 to propose appropriate supply and demand measures to ensure that they can continue to supply existing and new customers. Consideration is given to reducing the potential demand for water before proposing supply measures in our WRMP. It is acknowledged by Anglian Water that deficits are forecast in the following WRZs: • Fenland (AMP 6) • Huntstanton (AMP 7) • Norwich and the Broads RZ. (AMP 6) The WRMP outlines the measures which are proposed by Anglian Water to address the projected deficits. To ensure that all opportunities are taken to reduce demand they are keen to promote measures to encourage improved water efficiency as part of new development including the inclusion of the optional higher water efficiency standard for residential development (110 litres/per person/per day) in Local Plans and innovation in water efficiency/re-use to contribute long term water resilience within the Anglian Water region.	Add new agreement to adopt the optional higher water efficiency standard for residential development (110 litres/per person/per day) in local plans

BHLF-3C85-CA65-J	Greater Norwich Local Plan	I am pleased to see that there is a commitment in the Strategic Infrastructure and Environmental Objectives section to reducing the demand for and use of water and that the section on water promotes high standards of water efficiency in new development. However, in my view it is important to make it clear just how Local Plans in this area of low rainfall can promote water efficiency. To do this, I think it is necessary to have an agreement concerning implementing the optional higher Building Regulations standard of 110 litres per person per day (lppd) in new housing development and to promote water efficiency in other types of development. The optional higher Building Regulations can be required through Local Plans in areas of water stress, which applies to all of Norfolk. In my mind, it is important that all LAs commit to this approach through their Local Plans. Information in the attached document, which identifies the possible policy approaches for Greater Norwich through its emerging Local Plan, can be adapted to provide a justification for promoting water efficiency, information on how it can be done and to inform the content of an additional agreement in the NSF.	The Environment Agency has advised the Secretary of State that the areas classified as 'Serious' in the final classification table of the above document should be designated as 'Areas of serious water stress'. The Anglian Water company area is considered to be such an area and includes the majority of Norfolk including Greater Norwich. Breckland and Broadland Districts Councils, and the Broads Authority (in the AW area only) have included the reference to the optional higher water efficiency standard for residential development in their adopted or emerging local plans. Anglian Water is supportive of the inclusion of the optional higher water efficiency	Add new agreement to adopt the optional higher water efficiency standard for residential development (110 litres/per person/per day) in local plans
BHLF-3C85-CA35-D	Holme-next-the-Sea Parish Council	This section notes that the capacity of sewage works and receiving water courses, together with quality of outputs are all strategic issues - and further that it will be necessary co-ordinate the approach to water management. It would be helpful to understand how this approach is being co-ordinated through the NSF. Also – what arrangements are in hand to monitor water quality- especially environmentally sensitive areas in the Protected Sites outside The Broads? Norfolk has a number of rare chalk streams that provide important wildlife habitats but which are facing pollution issues. These include the River Hun which flows through Holme next the Sea – and falls outside the EA’s monitoring responsibilities. Once again West Norfolk seems to be under-represented here - the NSF notes that in considering the distribution of growth, LPA’s need to avoid cumulative detrimental impacts on the most sensitive water courses - particularly those in the Broads and on the Wensum. Can the NSF provide an overall approach to monitoring and caring for these rivers – and also for other water bodies including the lagoons which support rare birds and other wildlife – many of which currently enjoy SAC / SPA / Ramsar / SSSI status (such as Broadwater Lagoon in Holme)? The identification of the cumulative impacts of incremental change is especially welcomed – and we believe is a growing issue for the AONB and the Protected Sites in Holme-next-the-Sea.	Permits issued by the Environment Agency for water recycling centres (formerly sewage works) state a variety of conditions including the permitted dry weather flow (DWF) and the chemical standard of discharge. Permits are issued by the Environment Agency and the conditions within are site specific, set at a level to ensure sufficient water quality at the discharge point. Anglian Water regularly monitor the position against both the DWF and the standards which can prompt further investigation, a change in working practices and/or investment through their business plan where required There is a need to consider the scale and timing of development outlined in Local Plans to ensure it is aligned with water recycling centre capacity (formerly sewage works) and the NSF has complete work to address this.	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	It is critical that the approach to water is approached holistically and that constructive approaches to water supply and management are considered at the early stage of allocating land for development which also fully take into account flood risk, and the water requirement of the agricultural and other industries.	Water resource planning is undertaken on a much larger scale than individual local authorities – it is undertaken on a sub-regional scale. Anglian Water has been working with a range of organisations including representatives from the agricultural sector as part of the Water Resources East Anglian project on long term water resilience. Therefore the availability of water resources within the Anglian Water region is unlikely to have any impact on the delivery of individual sites in Norfolk County. However consideration should be given to water supply as part of the identification of allocation sites in Local Plans currently under preparation.	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	7.4 Water: can we build in the need to retain sufficient water to meet environmental needs? There is a growing concern that freshwater flows in the summer- which avoid toxin build up, retains habitat needs, maintains attractiveness for tourists, repulse saline incursion etc – are getting to or below minimum levels. There is also a need to retain winter flows to flush out pollutants.	Water section has been updated in light of comments received	No further change to NSF
ANON-3C85-CA6C-Z	Environment Agency	We would ask that consideration is given to recognising the importance of the county’s rivers. This could possibly be added to the first bullet point of the To improve and conserve Norfolk’s environment by: section on page 40. The Wensum is mentioned in particular in section 7.4 at the top of page 44. This is good as it recognises it’s SAC designation, but we should not forget that we have duties under WFD and through the River Basin Management Plan to improve all waters that are below target status, and not to allow deterioration in any element. The wording in the very last paragraph of section 7.4 may therefore not go far enough. It states : In considering the distribution of growth Local Planning Authorities will need to ensure that distribution avoids cumulative detrimental impact on the most sensitive water courses particularly, those in the Broads and on the Wensum which cross a number of Local Planning Authority boundaries. One mechanism to help with this welcome approach to joint working is to ensure that each public body discharges their duty to have regard to River Basin Management Plans to ensure that their plans and actions do not risk delivery of the environmental objectives for each water body in the County (not just protected sites). Most of our rivers are not of the environmental quality that they could be for various reasons. The potential for sensitive development to improve this should be harnessed. There may be significant opportunities for obtaining external funding for activities that delivered shared environmental improvements (last bullet on first page of introduction). EA WEIF (Water Environment Improvement Fund) may be one such example where new activities are designed so as to deliver improved environmental outcomes, and other organisations may have similar opportunities where shared objectives can be identified. We welcome the acknowledgement that development may need to be phased to ensure water quality is maintained in regards to sewage discharges. As your document states water cycle studies should be used as evidence to maintain water quality. The document quite rightly states that flood waters do not respect administrative boundaries and would support a joint approach to minimising flood risk through collaborative working. The sentence at the top of page 56, mentions the epoch 2 scheme, for clarity we feel this should clarify it relates to epoch 2 of the Great Yarmouth Tidal defence project. The Great Yarmouth tidal defences epoch 2, runs from 2016 - 2021 with a start date of 2026. We would support funding from various sources as indicated in the document but feel contributions should also be sought from developers. We feel that the text regarding funding could be expanded and strengthened - we have included a possible suggested text below The Great Yarmouth tidal defence works planned until 2061 manage the risk of flooding to the town in a changing climate. The defences protect not only people, property and businesses in the town, but also important infrastructure links and services that serve the whole of Norfolk and enable growth and development. Government will provide funding for a proportion of the works based on the number of homes better protected. However partnership funding will be required to fully fund the project and	Support noted and updates made as required including the inclusion of the following text - Each public body will have regard to River Basin Management Plans to ensure that their plans and actions do not risk delivery of the environmental objectives for each water body in the County (not just protected sites).	NSF updated

BHLF-3C85-CA3R-C	Member of Parliament	Re: Consultation Response from the Rt Hon Norman Lamb MP to the Norfolk Strategic Framework I write with regard to the above. I enclose a copy of the consultation response submitted by my constituents, Mr and Mrs Harris of Catfield Hall in Catfield. As you can see, Mr and Mrs Harris' response directly challenges the assertion on page 43 that: "Anglian Water's Water Resources Management Plan to 2040 demonstrates how sufficient water resources for future growth will be provided and therefore water supply is not a strategic constraint to development." Mr and Mrs Harris' submission goes on to make the point that the outcome of the public enquiry in respect of Catfield Fen has not been sufficiently understood and acted upon in terms of the implications for water abstraction in the Broads and the sufficiency of water resources in the Broads area in respect of future growth. I do hope that you will take very serious note of the full consultation response submitted by Mr and Mrs Harris. These are clearly important issues given the fact that Catfield Fen is a wetland of international significance with the highest level of conservation designation and also that there are other significant and sensitive sites across the Broads area.	Please see point above regarding Catfield Fen	No change to NSF
	Dereham Town Council	. The Dereham waste water capacity improvements are not listed. . Table 12 – this table does not give any certainty, most of the start dates are not known, two that have been given a date will start at some point over the next 10 years. Most of the estimated costs are to be confirmed and 'likely funding sources' does not really provide any certainty either. It would be useful to know what funding has actually been confirmed. Certainty over deliver is important particularly for Thetford being a major growth area which can only deliver 300 houses without the energy supply being installed, it would therefore be expected that there is a greater level of certainty on this matter.	Anglian Water are currently in the process of bringing forward a scheme which will involve the construction of a new rising main and associated infrastructure to direct foul flows from Dereham. The scheme is expected to be completed by December 2018. Table 11 and 12 separate out commit and promoted development projects, further details will be added in future version of the NSF and Infrastructure Delivery Plan	No change to NSF

CONCLUSION AND NEXT STEPS COMMENTS

Response ID	Organisation	Answer	Officer response	Action
ANON-3C85-CA87-P	Resident	I would urge that this costly waste of ratepayers money be suspended until the outcomes of Brexit are clearer as it will impact on so many areas and make this document , in its current form effectively useless	Norfolk Authorities have a duty to plan strategically and are unable to suspend work until Brexit outcomes are clear, however this work is an on going process and will be reviewed when the Brexit position is clearer.	No change to NSF
ANON-3C85-CA8T-K	Hockering Parish Council	We are appalled at the amount of money being spent on roads when public services are deteriorating.	Noted	No change to NSF
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	☐ Inter agency co-operation is vital to making it happen.	Support Noted	No change to NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	Will the people of Norfolk be listened to or will we be dictated to by central government who will threaten us with economic sanctions if this new building does not take place	In reality it is acknowledged that local authorities will only have limited influence over the level of housing they seek to plan for owing to central government requirements related to OAN.	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited fully supports the Norfolk Planning Authorities and their holistic commitment to vital infrastructure enhancements. These enhancements are crucial to facilitate economic growth and meet housing demand in Norfolk. Where public funding is available it should be used to help support new development and improve the viability of strategic development schemes which generally require considerable upfront investment in infrastructure before substantial housing growth can be delivered.	Support Noted	No change to NSF
ANON-3C85-CAJC-M	Borough Council of King's Lynn and West Norfolk	OVERALL COMMENTS ON THE NORFOLK STRATEGIC FRAMEWORK☐ On 6 September the Borough Council Cabinet resolved that the Norfolk Strategic Framework be supported.☐ The decision was taken to do this so as to ensure that the Council discharges its legal duty to co-operate with neighbouring authorities in relation to strategically important land use☐ issues which cross administrative boundaries. The result of such cooperation☐ is expected to be better planning outcomes.☐ The Borough Council has actively co-operated in a number of joint studies with the wider group of authorities and has found this to be beneficial strategically and financially. The agreements specified throughout the document are acceptable as a starting point for further co-operation in the next round of local plan work, and could potentially be developed further.☐ ☐ (The full Cabinet report can be found at:☐ http://democracy.west-norfolk.gov.uk/documents/s16561/NSF%20Report%206%20September%202017.pdf)	Support Noted	No change to NSF
ANON-3C85-CAJG-R	Resident	Work must be done with NNDC and local full time NNDC residents so the proposals take account of the district's needs. Currently the document fails to do this.	Noted	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	The collaboration and cooperation demonstrated in this document is very welcome and must continue so that there are coordinated approaches to the challenges and opportunities facing Norfolk.	Support Noted	No change to NSF
ANON-3C85-CA6U-J	Resident	Please see comments for Section 7. The infrastructure is the backbone of economic growth.	See response in section 7	No change to NSF
ANON-3C85-CAJF-Q	Resident	That this is a Draft is welcome, because there are considerable deficiencies between the input policies and agreements and outcomes (the vision). This is probably nowhere more so than in the provision of local bus services, but it is more widely apparent than that.	Noted	No change to NSF
BHLF-3C85-CA34-E	Norfolk Geodiversity Partnership	The Norfolk Geodiversity Partnership would welcome opening a dialogue with the NSF process, as part of ☐ improved networking re. objectives for the natural environment.	Noted	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	1 KLBID hopes that its input in answers to the previous questions will be given due consideration in the process of writing the final NSF, and in particular weight will be given to its view, set out in the various sections above, that the countywide document is widely at odds with the economy and experience in the West of the county, and for that reason alone, it needs redrafting to recognise the differences and how they be addressed.☐ ☐ 2 KLBID does not agree with the setting up of a secretariat to administer, review and refine the NSF following its adoption by Members. This creates another level of bureaucracy and sucks funds away from frontline services, and for that reason must be resisted.	Input is appreciated and other views noted	No change to NSF

BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	Section 8 – Conclusions and Next Steps The NSF is a new and very strategic document with some sound objectives and a commitment to joint working. For this reason it is not always easy to translate how the underlying principles and proposals might be followed through and implemented in practice. We understand that much of the document may change in the run up to the final version but in the meantime, it would be extremely helpful if NCC could arrange for a “roadshow” to allow Parish Councils, Neighbourhood Plan Teams (not mentioned within the NSF but now growing in number across the County) and other interested organisations to get a better understanding of the way in which the framework document will / can be used on a practical level.	In practice resources will be insufficient for detailed engagement at the parish or neighbourhood level in relation to the NSF. It is important that neighbourhood groups continue to engage directly with their relevant district in relation to planning matters.	No change to NSF
ANON-3C85-CA3V-G	Resident, business	The planning process is too slow and inflexible. Documents such as this need to be 'live' - and under constant rolling review and adjustment. The days of producing a printed plan to sit on a shelf for reference are behind us. The up-to-date version can be accessed on line at any time. So let's keep it (and indeed associated LDFs etc) up-to-date and relevant rather than the system we have had of working to a plan clearly out-of-date but with half an eye to an 'emerging' replacement. In particular, we will need an urgent review of all plans when the implications of Brexit are clearer - both to address any problems and to seize opportunities before they are missed.	Comments noted, Norfolk Authorities are committed to ensuring the NSF is a live document and envisage that it will be continue to be updated and enhanced, this is particularly important given the current review of the NPPF and the expect Statement of Common ground which will be addressed through the NSF	No change to NSF
ANON-3C85-CA6C-Z	EA	whilst we have no specific comments on this section, we would welcome the opportunity to work with you in the future to assist in the delivery of the plan producing environmental outcomes for people and wildlife	Future input and support is welcomed.	No change to NSF
ANON-3C85-CA3N-8	Heritage Railway worker, Chairman of BBNWA and local Residents Associaiton	I write as a member of the Melton Constable Trust and The Mid-Norfolk Railway and as a constant visitor to Norfolk mainly to visit the heritage railways and Norfolk on Holiday. I support those that actively pursue the prospect of bringing back regular rail services to places such as Dereham, Fakenham and Holt by use of the existing heritage lines and existing Network Rail routes. To this end I support the feasibility studies of those groups hoping to link up the railways of both MNR & NNR which would be an superb addition and tourist attraction to Norfolk. This would be by using purchased land at both Holt and Fakenham. As has been shown elsewhere in the country, we believe that this could make a massive contribution to the local economy, help address road congestion , be a further boost to tourism and help tackle rural isolation. To this end can we please suggest that there is a positive reference in the document to continuing support for the Bittern and Wherry lines and support in principle for the reconnection to the main network to Dereham, Fakenham and Holt ? The technical and financial hurdles are recognised. We are only asking for support in principle for the work we are pursuing and that all any future development of properties is only given consent where it does not hinder our work in moving forward with our aims.	Noted	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	We support the joint working that this Framework generates and hope that this can evolve to create the strategic approach essential to the successful development of a cross cutting planning framework, to address the specific issues of economy, housing and infrastructure in the County. We also advocate the role of a special set of workshops to explore the more imaginative aspects of our comments and vision, led by a consortium of politicians, business interests, agricultural advocates, conservationists, and community and youth organisations. This process would not only explore the viability of garden communities as part of the new Framework. It would also re-examine some of the spatial improprieties of its smaller scale housing devilmnt proposals, and set the high benchmark for the provision of only energy, water, waste and carbon efficient properties and community values which must surely be the lifeblood of any community designed to exist for more than fifty years to come. As the leading independent planning practice in Norfolk, we would be keen to work with the County and District Councils to help develop this Framework and this vitally important ensuing stage.	Comments noted. Offer of future engagement on future planning matters is welcomed.	No change to NSF

ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	We would look forward to meeting with the NSF to explore how BG PL&M can support the emergence of a positive , sustainable and deliverable grow agenda for Norfolk	Comments noted. Offer of future engagement on planning matters is welcomed.	No change to NSF
ANON-3C85-CA31-B	Wroxham Parish Council	Wroxham Parish Council supports the Norfolk Strategic Framework’s aim to improve quality of life for the population of Norfolk by ensuring new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure. It agrees with the assessment that Norfolk’s infrastructure needs significant enhancement if growth is to be delivered without compromising the quality of life and environment on offer. The key word to remember, the Parish Council feels, is ‘sustainable’. We firmly believe that a by-pass would provide the housing growth necessary in this area and alleviate the existing pressures on the heart of our twin communities.☒	Support and comments Noted	No change to NSF
ANON-3C85-CA35-F	Tunstead & Sco Ruston Parish Council	The document is far too wordy and should be more precise. Much further consultation and public awareness should be distributed. Suggest local media is used to promote the draft document to encourage response through local press.	Noted	No change to NSF
ANON-3C85-CA3K-5	Natural England	Natural England welcomes the opportunity to comment on the draft NSF. We support the production of shared objectives for all planning authorities to help ensure that Norfolk's environmental assets are protected and enhanced. ☒ We welcome further engagement in this strategic process.☒ If you have any questions about our comments please contact me.☒	Support Noted	No change to NSF
BHLF-3C85-CACV-Z	Gladman	Conclusions☒ Gladman welcome this initial opportunity to comment on the draft Norfolk Strategic Framework Statement and☒ hope that these comments are found to be constructive. Gladman would like to remain on the consultation☒ database and kept informed of any further stages of consultation.	Support Noted	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	Hoveton Parish Council supports the Norfolk Strategic Framework’s aim to improve quality of life for the population of Norfolk by ensuring new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure. It agrees with the assessment that Norfolk’s infrastructure needs significant enhancement if growth is to be delivered without compromising the quality of life and environment on offer. The key word to remember, the Parish Council feels, is ‘sustainable’.	Support Noted	No change to NSF

Response ID	Organisation	Answer	Officer comment	Action
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	In case it was missed earlier, I ask that Agreement 1 at Sect 1.3 be amended to include: employment, economic, infrastructure and environmental needs. This shouldn't be limited to housing.	Response noted in Section 2	No change to NSF
ANON-3C85-CAFT-1	Resident	I'm interested to see that there is no mention of CIL / S106 payments and use in order to support the same outcomes desired by the strategic framework. If the funds generated by the development in areas isn't well used (as it often isn't now) and without the engagement of communities then it's a missed opportunity. Too often generic consultation overrides genuine community engagement in decision making, and decisions are taken by a small handful of people in councils with very little true involvement of others.	Different approaches exist towards CIL and sec 106 across the County and this is really a matter for the LPAs to address individually or collectively (for example through the Greater Norwich Growth Board) within the confines of legislation	No change to NSF
ANON-3C85-CAXF-5	N2RS - No to Relay Stations	The picture shown is an example of the working landscape which we value so much. This is at risk of development with cable relay stations proposed for the area. This will have huge impact on the area. I write on behalf of N2RS which currently has around 350 people who oppose these relay stations. Instead they support HVDC technology to ensure onshore wind farm development respects our countryside.	Noted	No change to NSF
ANON-3C85-CAJ1-2	Resident	I have found it all most impossible to use this website. Two scrolling bars make it difficult to focus on any one section. The outer one simply covers the first page of each section and then takes you to the comment box. Clicking on the inner bar makes the image jump around so that I found it impossible to read more than 2 or 3 lines on a page. Sometimes moving the outer bar allowed me to read a bit more of the substantive passages, but then switching to the inner bar put me on a small piece of test, less than a page. Scrolling back was impossible.	Noted	No change to NSF
ANON-3C85-CAJW-8	Chedgrave Parish Council	Please be advised that at our last Parish Council meeting on 7th September 2017, there was a general discussion about the document which was considered to be too lengthy and incomprehensible for detailed comment. The Councillors also felt that their views would not be taken into consideration anyway. Thank you.	Noted	No change to NSF
BHLF-3C85-CA6B-Y	Northwold and Whittington Parish Council	Please be advised that Northwold and Whittington Parish Council discussed the Norfolk Strategic Framework at its meeting on 5th September. No comments were raised for submission.	Noted	No change to NSF
BHLF-3C85-CA6Z-Q	Cringleford Parish Council	Cringleford Parish Council is grateful to have been consulted. We have noted the contents which will inform our responses in the future.	Noted	No change to NSF
BHLF-3C85-CA34-E	Norfolk Geodiversity Partnership	The Norfolk Geodiversity Partnership would welcome opening a dialogue with the NSF process, as part of improved networking re. objectives for the natural environment.	Noted	No change to NSF
BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	SUMMARY Norfolk Area Ramblers welcomes the clear identification and quantification of growth in the over 65 population and the importance of investment and maintenance in the Green Infrastructure network. We see 3 areas of omission: 1.The need to recognise explicitly the implications of rapid growth in population among the middle aged cohort who will be interested in developing and maintaining their health through fitness. Walking is likely to be the most popular of these activities which will vary from strolling, short brisk walks and group led middle distance walks and a significant level of demand is likely to occur from walkers wishing to exercise in in rural areas. 2.Although there is recognition of the need for investment and maintenance of Green Infrastructure, there is no explicit mention of the PROW network and its importance in providing the variety and scale of opportunity for walking, riding and cycling exercise for this growing cohort of demand. 3.In order to maintain the PROW network over the 20 year horizon envisaged by the report a strategic and proactive asset management plan approach will need to be adopted at all levels of local government.	The points raised are addressed in other sections of the document as they are raised.	No change to NSF

BHLF-3C85-CA3J-4	The Somerleyton Estate	We are instructed by The Somerleyton Estate to write to you in response to the above-named public consultation. ☐ The Somerleyton Estate has enjoyed a very productive mutual relationship with the Borough with specific regard to Fritton Lake for over ten years and it is because of this close working relationship the Estate has taken care to make representations to planning–related consultations representing the ‘rural point of view’ as they do successfully in other local authority areas. As a significant land owner and provider of one of the Borough’s primary inland tourist attractions the Somerleyton Estate have an interest in the sensitive development of the Borough and more specifically the area of, and approach to, this attraction. This interest therefore extends to any strategic planning documents which would inform future local plans.☐ We understand that whilst “concentrating only on those matters where there is a clear need for agreement between the Local Authorities” two key aims of this Norfolk Framework are “to inform the preparation of future local plans and high levels plans such as the Strategic Economic Plan”. As such The Somerleyton Estate is keen that the Framework fully recognises the importance of facilitating sustainable rural tourism whilst ensuring sufficient environmental safeguards are in place to prevent harm to those special qualities that tourists visit Norfolk for.☐ In 2012 and 2015 The Somerleyton Estate made representations to the Gt. Yarmouth Core Strategy and look forward to being consulted on the site specific and development management policies as they progress. In those earlier consultation responses the Estate were keen to make clear the need to have regard to the defining characteristics of the landscape character of the Beacon Park area and specifically to seek to avoid the coalescence of settlements which might encroach upon the strategic countryside gap between Browston and Gorleston/Bradwell. Our responses to this consultation compliment the earlier approach and we have provided specific responses via the consultation website in the format required. This letter reiterates the responses made there.☐ ☐ The main point we would make about the draft Norfolk Strategic Framework is that tourism is conspicuous by its absence from a great deal of the document not getting its first mention until page 22. As a result there is little outward appreciation of the contribution tourism makes to the Norfolk economy and how this relies on both promoting related economic growth but also protecting the environment upon which Norfolk tourism relies.☐ We understand from the Great Yarmouth Tourism Strategy 2013 to 2018 that “tourism is one of the key sector industries within Norfolk, supporting over 51,000 people and contributing some £2.6 Billion to the local economy”. We also understand that “the most recent Tourism in Norfolk Strategy covered the period 2009 to 2012”. https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=980&p=0☐ We appreciate the Framework’s focus on trying to attract hi-tech industries and supporting the off-shore energy industry but this should not be at the expense of existing key industries. As the Great Yarmouth Tourism Strategy points out “tourism is Great Yarmouth’s biggest single sector, and it directly and indirectly represents an economic impact of £531 million per annum (2011 figures) and 29.3% of the borough’s employment”. We would ask the Borough Council to make sure it fights to ensure the tourism industry gets adequate representation in this Norfolk Framework in particular focussing on supporting the whole county and not just the ‘Norfolk Coast, the Broads and the Brecks’.	Noted the tourism reference in the economy section has been updated	No further change to the NSF
ANON-3C85-CA6Q-E	Resident	The conclusion says that the document may change considerably. Any major revisions will need to be comprehensively reviewed again by the same audience as this draft.☐ ☐ As one progresses through the document, its proposed solutions seem to become weaker. It is almost as if it was structured to put those sections, where the most effort and strength in is its authoring, at the front of the document. The latter sections need to be strengthened and not devolve its observations and its proposals to other documents. Otherwise the framework appears to dissolve.	Noted, the document has been enhanced from feedback received through the consultation.	No change to NSF
BHLF-3C85-CA3F-Z	Great Yarmouth Borough Council	Great Yarmouth Borough Council endorses the Draft Norfolk Strategic Framework and the agreements in it.☐ The Borough Council looks forward to working with its partners to finalise the document in the light of comments and suggestions received during the course of this consultation, and to continue to address strategic planning matters on into the future.	Noted	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	GENERAL REPRESENTATION – NEW NORFOLK GARDEN TOWN ☐ As Norfolk’s largest independent planning practice, we have a comprehensive understanding of the social, economic, environmental, community and spatial requirements within our County. We would like to convey our own experiences into this consultation over the Norfolk Strategic Framework. We especially want to advance the case for a revolutionary approach to meeting future housing and community infrastructure needs based on an updated vision of the garden settlement as advanced by planning pioneers Ebenezer Howard and Frederik Osborn a little over a century ago. These men were holists who envisioned health, beauty, work, leisure and society all as one, intricately connected to natural beauty and the enhancement of nature. They were convinced that health, natural surroundings, social support and an overwhelming commitment to decency and fairness would lead to creative and productive people thriving on innovation and enterprise. Letchworth and Welwyn Garden City were established using these principles and we contend that a new garden town in Norfolk to meet known growth requirements should be explored through the emerging Strategic Framework. Our vision is a to create a new stand-alone 21st Century highly accessible, inclusive and smart settlement comprising a connected network of modern living and employment spaces set in the context of sustainability principles and practices. ☐ ☐ We share your aspirations for a County that will thrive and grow whilst respecting its heritage and meeting the challenges of this Century. We believe that this will require joint working between Local Planning Authorities, communities, funding partners and developers, in order that shared aspirations and joint commitments can be brought forward in a planned manner. We would like to be involved in this process.☐ ☐ In addition to the proposed garden town, limited development through the careful expansion of our existing towns and larger villages will also be required to support and sustain existing communities in the period up to 2036. We acknowledge and recognise that this additional growth is required as the coming 20 years will see at least 14% increase in Norfolk’s population, excluding growth through certain sectors of housing and via the Greater Norfolk Joint Core Strategy. ☐ This will also lead to a need to provide additional jobs, social care, community infrastructure and public transport improvements across the region. We consider that properly planned development within a new garden town could be used to cross fund and support wider initiatives and inter-District transport improvements to benefit Norfolk’s existing rural population. There is also a growing problem of affordability, low paid employment, social inclusion, an increasing need for elderly and specialist accommodation, and problems with increasing social exclusion and disillusionment amongst the young. We believe that a new bespoke garden town could be the answer to addressing some of these problems.☐(continued below) ☐	Noted	No change to NSF

ANON-3C85-CA3Y-K	Lanpro Services Ltd	(continued from above) We envisage a garden town that captures, retains and recycles part of the development value from the land being developed. This money will be channelled through long term stewardship models governed by Community Trusts to reinvest the wealth created back into the garden town in a variety of ways to create real long-term community benefits and provide opportunity. These are the very best of Howard’s principles and linked with modern, sustainable development, with place making at its heart. Through this strategic approach to meeting Norfolk’s longer-term housing needs we can delivery local and sub-regional benefits whilst causing minimal harm to existing communities and the Norfolk landscape. In addition to high quality place making, appropriate site selection has the potential for improvements to local infrastructure, road and rail based public transport networks, schools, medical facilities, care and community facilities, benefitting communities far beyond the immediate environs of the new settlement. It is this value-added element which is the hallmark of the garden community practice and an approach that should be seriously considered as part of this strategic priorities assessment process. The same opportunities cannot be delivered through more traditional dispersed housing strategies. We request that serious consideration be made in the strategic review to create the guidelines and opportunities for a planned new garden town within Norfolk, based on the full suite of garden community principles, which will create certainty in meeting the aspirations of this document and ensure genuine betterment for the local community. We urge Norfolk’s Local Planning Authorities to work land owners, private sector developers and experts in stewardship, land capture and futurism to understand whether a garden town opportunity exists and we would encourage a full debate as to how these principles can be applied to benefit our County.	Noted	No change to NSF
ANON-3C85-CA35-F	Tunstead & Sco Ruston Parish Council	Our Parish Clerk and Councillors were unaware of the document. The response deadline was far too short to consider the document properly.	Noted	No change to NSF
BHLF-3C85-CAC8-2	Suffolk County Council	The Suffolk local authorities (Forest Heath District Council; St Edmundsbury Borough Council; Mid Suffolk District Council; Babergh District Council; Ipswich Borough Council; Suffolk Coastal District Council; Waveney District Council and Suffolk County Council) welcome the opportunity to comment on this draft document. They also welcome the on-going involvement of the Suffolk authorities in the development of the framework. There are important common issues for Norfolk and Suffolk both at strategic and more local levels. Many of the strategic issues have been identified within the New Anglia Local Economic Partnership’s New Economic Strategy. It will be important for the planning policies that emerge from the Framework (and for those in Suffolk) to relate closely to that Strategy if the area as a whole is to be successful both in its growth ambitions and in achieving the infrastructure required. In doing this it is welcome that the time horizon for the Norfolk Strategic Framework is 2036 which aligns with the most if not all of the end dates for local plans in Suffolk now being prepared. (It is acknowledged that parts of both counties also lie within the area of the Greater Cambridge Greater Peterborough LEP and there may also be a need to link to initiatives in that strategy as it develops along with the spatial strategy of the mayor of the combined authority for that area.)	Noted	No change to NSF
BHLF-3C85-CACM-Q	Savills	Support is given to the collective authorities for seeking to formalise the cooperation between neighbouring authorities and seeking to provide a framework through which they can address cross-boundary planning issues. It is considered that this proactive approach to strategic planning is in accord with the core principles for planning as stated in Paragraph 17 of the National Planning Policy Framework (NPPF). It is, however, considered that further guidance is required to clarify what weight should be given to the document once adopted.	The matter of weight to be ascribed to agreements and text in this document will vary depending on circumstances and will be a matter for each local planning authority	No change to NSF
BHLF-3C85-CACV-Z	Gladman	The Duty to Cooperate (DtC) is a legal requirement established through Section 33(A) of the planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on crossboundary strategic issues through the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of a Local Plan. This matter cannot be rectified through modifications. The Planning Practice Guidance (PPG) provides guidance upon compliance with the DtC which makes clear that local planning authorities should explore all available options of delivering the planning strategy within their own area, and should approach other authorities with whom it would be sensible to seek to work to deliver the planning strategy. 1. This should be achieved through co-operation between local planning authorities, county councils and other public bodies to produce effective policies relating to strategic cross boundary matters. 2. Whilst there is no definitive list of actions that constitutes effective cooperation under the duty, cooperation should produce effective policies relating to cross boundary matters and may involve local planning authorities and public bodies entering into agreements on joint approaches, which may involve joint evidence and strategies to define the scope of Local Plans across the Housing Market Area (HMA). It is clear that the Central Norfolk HMA is affected by the influence of a dynamic market area with an emphasison meeting the HMA’s economic growth ambitions. It is therefore important that the authorities contained in the HMA do not lose sight of this objective and the that the DtC is a process of ongoing engagement and collaboration and that it is intended to produce effective policies on cross boundary strategic matters. 3. Accordingly, the Councils will need to continue to engage and work with each other to satisfactorily address any cross boundary strategic issues.	Noted	No change to NSF

		Central Norfolk Strategic Framework Any issues of unmet housing need arising from the relevant authorities in the HMA must be fully considered through the preparation of Local Plans, working under the requirements of the DtC. To achieve this, it is vital that this matter is carefully explored through joint working with all local planning authorities within the HMA, together with any other relevant local authorities that the HMA has a clear functional relationship with. Where necessary, a strong policy mechanism will be required within each Local Plan to demonstrate that unmet housing needs arising from any relevant authorities and those with a clear functional relationship will be met during the plan period. The need to tackle any issues of unmet housing need through the plan making process was highlighted in an appeal decision at Land off Watery Lane, Curborough, Lichfield which was recovered by the Secretary of State (SoS) and determined in a letter dated 13th February 2017. At paragraph 40 of the SoS's decision letter, the distinct possibility of Lichfield having to provide for a proportion of Birmingham's unmet housing need through the local plan making process is highlighted: "... while there is a distinct possibility of Lichfield having to provide for some of Birmingham's housing need, there is a mechanism for a review in the Local Plan and it would be inappropriate now to speculate on any contribution by Lichfield. As such the Secretary of State agrees that this should not be considered when assessing the merits of this appeal scheme." Although it was considered inappropriate to speculate on any contribution towards Birmingham's unmet needs within Lichfield in the context of an appeal made under Section 78 of the Town and Country Planning Act 1990, this decision makes it clear that any issues of unmet development needs must be addressed through the local plan making process. Accordingly, it is important that the Strategic Framework sets out a clear approach to dealing with any unmet housing needs which may occur over the plan period. The Strategic Framework should include an agreement setting out a clear mechanism of how growth will be apportioned and how each authority should include a policy within each Local Plan in the HMA should any authority be unable to meet its housing needs in full.	Noted	No change to NSF
ANON-3C85-CA39-K	Salhouse Parish Council	As a Parish Council we have concerns about how our voice will be heard with the next level, the District Council, and how much influence we will have on the decision making process. ☐ As the Parish Council we have knowledge of the village and local area and have concerns that our opinions and recommendations will not be listened to as we are at the lower level of the consultation process. An example for Salhouse is the Neighbourhood Plan which has recently been adopted, yet there is no mention of Neighbourhood Plans within the document.☐ We feel there is not enough information given as to how this Strategic Plan will be delivered.	Noted	No change to NSF
BHLF-3C85-CACC-D	South Norfolk Council	Preamble☐ The response below is an officer-only response at this stage, but it has been informed by comments made at the meeting of the Council's Regulation and Planning Policy Committee on 20th September 2017. The Council will submit its formal response following consideration at Cabinet on 9th October 2017, and so there may be some modifications to the response below. ☐ ☐ Response☐ South Norfolk Council has considered the draft NSF and believes that it is, overall, a very useful and significant document, which will assist all Norfolk authorities in discharging their ongoing Duty to Co-operate requirements. It is also likely to put the Norfolk local authorities in a good position to meet the emerging requirements to produce a Statement of Common Ground with neighbouring authorities (as proposed in the current consultation on Planning for the right homes in the right places: consultation proposals. ☐ ☐ Overarching diagram☐ Finally, the Council asserts that the NSF would be improved with the inclusion, early on, of a "bubble" diagram, showing how the NSF relates to current and emerging Local Plans, Neighbourhood Plans, the NPPF and other relevant documents, so that it can easily be understood by all.☐	We would be happy to include any overarching diagram provided by South Norfolk DC.	No change to NSF
BHLF-3C85-CAFA-E	Marine Management Organisation	Thank you for giving the Marine Management Organisation the opportunity to comment on the Norfolk Strategic Framework.☐ It is pleasing to note reference to marine/coastal matters such as ports, the AONB, and Shoreline Management Plans.☐ I am not sure where reference would best fit given the nature of the document, but consideration of the East Inshore and Offshore Marine Plan would increase the soundness of the document.☐ I know you will have received the standard lines already, but the section of these that you may wish to consider for the above is:☐ As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. ☐ You may also wish to consider referencing specific policy from the marine plans where relevant eg PS3 around port development, objective 8 in support of marine protected areas, and GOV1 around infrastructure provision to support marine activities. ☐	General	Agree there's a need to make a reference, this will be added to the NSF in section 3

Norfolk Strategic Planning Member Forum

Terms of Reference (Dec 2017)

1 Introduction

- 1.1 The Localism Act 2011 inserts section 33A into the Planning and Compulsory Purchase Act (2004) the requirement for authorities and certain public bodies to engage on key issues under a 'Duty to Cooperate' when preparing Development Plan Documents (principally Local Plans), and other Local Development Documents.
- 1.2 The Act states, *inter alia* that Local Planning Authorities must:
- '...engage constructively, actively and on an on-going basis in any process by means of which activities within subsection (3) are undertaken.....'*
- 1.3 The Duty to Cooperate is a legal test when local plans are independently examined and Local Planning Authorities will need to provide evidence to demonstrate that they have undertaken the duty. Local Plans are also examined for their overall soundness. To discharge the soundness test work undertaken under the Duty to Co-operate must be demonstrably effective and as a minimum this will require:
- Genuine Member level co-operation.
 - A continuous process of co-operation throughout plan preparation.
 - Co-operation across all cross boundary strategic issues.
- 1.4 Norfolk Authorities have a strong record of working together through a range of both formal and less formal mechanisms. A Strategic Planning Officer Group has been established for many years and in January 2014 a Members Forum was established with the overall purpose of ensuring that the requirements of the Duty were met. This comprises Members from each of the Norfolk District Councils and the Broads Authority together with Norfolk County Council (the 'Core Group') supported by the Norfolk Strategic Planning Officer Group and meets on a quarterly basis to progress work under the duty.

2 The Forum

- 2.1 The Forum's overall purpose is to ensure that the requirements of the Duty to Cooperate when preparing Development Plans is discharged in a way which enhances the planning of strategic matters and minimises the risk of unsound Plans. It will provide the political input and steerage necessary to discharge the duty.

Powers

- 2.2 The Forum has agreed to meet for the purposes set out in these terms of reference to provide a vehicle for cooperation and joint working between local authorities and other parties within Norfolk and across any other area over which the duty may be applied. They will act together in accordance with their powers under sections 13, 14 and 33A of the Planning and Compulsory Purchase Act and Section 1 of the Localism Act 2011 for this purpose.
- 2.3 For the avoidance of doubt, the Forum cannot exercise any of the functions of a Local Planning Authority or competent authorities, such as setting formal planning policy or exerting control over planning decisions, nor can it amend any decisions made by other bodies such as the LEPs unless such powers have been expressly delegated to the Forum by one or more of its members. The Forum will recommend actions to the member authorities and others insofar as this is necessary to discharge the Duty and aim where possible to reach agreement in relation to strategic cross boundary land use issues.

Specific Activities

- 2.4 The Forum will address matters relating to the Duty to Cooperate to comply with Section 33A of the Planning and Compulsory Purchase Act 2004. In summary it will:
- Identify spatial planning issues of strategic importance that impact on more than one local planning area across Norfolk and a wider geographical area where appropriate to do so and provide the basis for working collaboratively within, and outside, of the 'core group' across a range of organisations and geographies as might be appropriate to address cross boundary strategic issues.
 - Recommend the most appropriate land use planning approach to better integration and alignment of strategic spatial planning across Norfolk and a wider geographical area where appropriate.
 - Provide the evidence that the Local Authorities are working 'constructively, actively and on an ongoing basis' on strategic planning matters to support delivery of Local Plans which will be able to be assessed as 'sound'.
 - With the agreement of member authorities, oversee the joint commissioning and preparation of evidence necessary to determine the most appropriate strategic spatial approach to cross boundary issues.
 - Produce an evidenced (documented) approach to cooperation across strategic cross boundary issues at a Member level and throughout the process of Local Plan Preparation.
 - Undertake any consultations which from time to time may be deemed appropriate to further the work of the forum.
 - Provide, through the individual Members of the Core Group, liaison in respect of Norfolk strategic planning matters with each of the local authorities represented in the Forum.

Specific Outcomes

- The timely production, maintenance and publication of an evidence base sufficient to address cross boundary strategic land use issues, to identify where such issues arise and recommend actions to the member authorities to address them.
- The preparation, agreement and updating of a *single non-statutory shared strategic framework* document (the Norfolk Strategic Framework) to inform Local Plan preparation covering any cross boundary strategic land use issues including but not limited to:
 - o homes and jobs;
 - o retail, leisure and other commercial development;
 - o infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management;
 - o minerals and energy (including heat);
 - o health, security, community and cultural infrastructure and other local facilities;
 - o climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape;
 - o nationally significant infrastructure.
- The preparation, agreement and publication of Statements of Common Ground, Duty to Co-operate Statements and Memorandums of Understanding on behalf of, and as agreed by, the member Authorities.
- The local authorities represented in the Forum are suitably aware and supportive of the Forum's activities, and engaged in identifying and addressing Norfolk strategic planning matters.

3 Governance and administrative arrangements

Membership

The Core Group will consist of one Member from each of Norfolk County Council, Norwich City Council, South Norfolk District Council, North Norfolk District Council, Broadland Council, Breckland District Council, the Borough Council of King's Lynn and West Norfolk, Great Yarmouth Borough Council and the Broads Authority. The membership of the group will be determined by each authority via annual nomination preferably of the Planning Portfolio Member or equivalent for each authority. Each authority should also nominate substitutes should the nominated Member not be able to attend particular meetings.

Membership of the Core Group will be kept under review and adjusted to reflect any wider geography over which it might be determined appropriate to cooperate.

Chairmanship and vice chairmanship will be determined by the Forum and reviewed each year.

Format of Meetings

Meetings will be held in public and will comprise the Members and officers from each authority. Others (specialists, representatives of other organisations, consultants) may attend and present at the meetings by invitation. An Agenda and papers will be circulated in advance of each meeting and informal action notes will be taken and published.

Public Information/website

Agenda and a brief note of any recommendations made back to LPAs will be made public via a Duty to Co-operate web page on the NCC website. See www.norfolk.gov.uk/nsf

Frequency of meetings

Every three months, or at intervals to be agreed, hosted by Norfolk County Council.

Secretariat

The secretariat for the group will be provided by the County Council.

Decision Making

The Forum is not a decision making body and will recommend actions to partner authorities. It will aim to reach a consensus where possible. Its recommendations are not binding on the actions of any of the partners.

NSPF identified Work streams (2018)

- (1) Support updates required as a result of the new NPPF due for publication in Spring 2018, this will include:
 - (a) Working with officers to progress the production of Statements of Common Ground in line with the proposed government timetables of Autumn 2018 and Spring 2019
 - (b) Work with officers to update the NSF in light of the new government Methodology for calculating Housing Objectively Assessed Need
 - (c) Work with officers to agree areas for enhancing the NSF following the analysis of the NSF Public consultation and in light of the updated NPPF
- (2) Work with authorities to identify areas for cost savings through joint working including analysis of the following areas where authorities have previously expressed an interest in joint working:
 - (a) Joint Strategic Needs assessment for older people
 - (b) Water Cycle Study
 - (c) Renewable Energy Assessment
 - (d) Further visitor Pressure Study
 - (e) Ecological Networks Assessment
 - (f) Strategic Infrastructure Study
 - (g) Retail and Commercial Leisure Study
 - (h) Business Growth and Investment opportunity Study
 - (i) Brown field and Self-Build Registers
 - (j) Reviewing of OAN in light new government methodology
- (3) On-going communication and support for Strategic Planning including the following:
 - (a) Support the yearly East of England Forecast Model run
 - (b) Support for the NSPG and Member Forum
 - (c) Maintain links to third parties eg Anglian Water, NALEP and EA
 - (d) Monitoring NSF for accuracy and updated where required
 - (e) Maintaining links to neighbouring authorities (Suffolk and Cambridgeshire) and their strategic planning work
 - (f) Maintaining links to other authorities completing non statutory frameworks to understand best practice and build links to DCLG



Broadland Equality Assessment

Name of Policy	Norfolk Strategic Planning Framework Cabinet Report
Name of Officer responsible for Policy	John Walchester
Date of Assessment	09/01/2018

Aims of Policy (a brief summary)

The NSPF sets out vision and objectives and areas of agreement between the Norfolk local planning authorities for guiding the strategic planning of the area.

1. Has the policy/procedure/strategy addressed one or more of the Equality Duty Aims?

(Please provide a narrative explanation as to how your document relates to each aim of the Equality Duty – for instance does your document demonstrate that the Council is adhering to any or each of the aims?)

Does it “Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act”

N/A

Does it “Advance equality of opportunity between people who share a protected characteristic and those who do not”

The Framework does not distinguish between those with a protected characteristic and those without, as such it advances equality of opportunity.

Does it “Foster good relations between people who share a protected characteristic and those who do not”

N/A

2. Which protected characteristics does this Policy impact: (please tick all that apply)

Age	☐	Sexual Orientation	☐	Pregnancy/Maternity	☐
Disability	☐	Civil Partnership/Marriage	☐	All of the Above	☐
Race	☐	Religion or Belief	☐	None of the Above	☒
Sex	☐	Gender Reassignment	☐		

3. Does the content of the document impact one protected group more than others?

(Please describe how it impacts the protected characteristic group more than others and whether this is negatively or positively)

No

4. Are there any vulnerable groups that have not been identified that are relevant?

N/A

5. Are there any sources of evidence that have provided information on what impact your policy/procedure/strategy could have upon the protected groups?

(Possible sources of evidence are research reports, consultation activities, public surveys etc...) Please also describe what information is required to demonstrate the community or customer need for what this document is proposing

N/A

6. Demonstrate where you have engaged individuals or groups, both internally or externally, during the development of this policy (include who you have consulted).

If the document is Government driven indicate how you have communicated this fact to those who are likely to be impacted.

Public consultation undertaken on draft document.

7. How has this engagement influenced the development of this policy? (if not, why not) Have you undertaken any analysis of the information gathered from engagement and made any changes to the document?

Various sections have been amended from the draft in light of the comments received.

8. Will it have a significant effect on how other organisations operate in terms of equality?

Yes ☐ No ☒

9. Have you worked with partner organisations to develop this policy and if so what has been their role?

The Framework has been produced by all the local planning authorities in Norfolk, together with relevant statutory bodies.

10. Have you set up a monitoring/evaluation process to check the successful implementation of the policy/procedure/strategy?

Yes ☒ No ☐

11. Please explain how you will resolve any issues or gaps identified during this assessment. (If you are unable to resolve the issues highlighted during this assessment please explain why and what alternative steps you can take)

The Framework will be monitored and updated as necessary by the Norfolk Strategic Planning Forum.

Signed by evaluator:

J. Walchester

Signed by responsible head of department:

P. Courtier

PUBLIC SECTOR EQUALITY DUTY ANNUAL UPDATE

Portfolio Holder: Policy
Wards Affected: All

1 SUMMARY

- 1.1 This report briefly summarises progress made by Broadland District Council during 2017 in meeting the Public Sector Equality Duty, introduced in the Equality Act 2010. This duty also requires the publication of an Annual Report demonstrating compliance. This report seeks approval to publish the report at Appendix 1 to fulfil this duty.

2 KEY DECISION

- 2.1 This is a key decision and has been published in the Forward Plan.

3 INTRODUCTION

- 3.1 The Equality Act 2010 introduced a Public Sector Equality Duty (PSED). This Duty requires Broadland District Council, and other public sector organisations, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- This duty covers nine protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation, marriage and civil partnership.

- 3.2 The Act also requires public bodies to publish an Annual Report demonstrating how they have complied with the Public Sector Equality Duty. It is proposed to make publicly available the report at Appendix 1 to fulfil that duty and enable service users, staff, the Equality and Human Rights Commission, regulators and other interested parties to assess the equality performance of the Council.

4 THE ISSUES

- 4.1 The Corporate Equalities Group (CEG) is the key mechanism by which Equality issues are promoted and monitored across the Council and consists of members of staff from across all service areas and an elected Member. The CEG is chaired by the Deputy Chief Executive.
- 4.2 At the beginning of the 2017-18 year, the CEG agreed four new actions that link to our published Equality objectives:
- Connect with religious and faith groups in the Broadland area.
 - Consider a Health in all Policies (HiAP) approach – explicitly taking into account the health implications of the decisions we make.
 - Update the Single Equality Scheme to instead be presented as a clear Plan on a Page.
 - Work in partnership to better understand mental health issues for children and young people.
- 4.3 The report at Appendix 1 highlights activities and work undertaken by the Council not just to work towards completing our actions and comply with the Public Sector Equality Duty but also to achieve what we, as a Council should do in order to realise our vision.

5 PROPOSED ACTION

- 5.1 It is proposed that Cabinet approves the appended report for publication in order to meet the statutory duties placed on the Council by the Equality Act 2010.

6 RESOURCE IMPLICATIONS

- 6.1 There are no resource implications associated with the publication of the appended report.

7 LEGAL IMPLICATIONS

- 7.1 If the appended report is not published Broadland District Council will be in breach of their statutory duties under the Equality Act 2010.

8 RISK IMPLICATIONS

- 8.1 If statutory duties are not met, action could be taken against Broadland District Council by the Equality and Human Rights Commission with financial and reputational risks for the Council.

9 EQUALITIES IMPLICATIONS

- 9.1 The publication of this Annual Report is the key mechanism through which the Council fulfils its accountability to the Broadland community, demonstrating that equality issues are taken seriously and demonstrating the progress that has been made. Should this report not be published, as well as not meeting statutory duties, it could have the effect of undermining the importance of equalities to Broadland communities.

10 CONCLUSION

- 10.1 The overriding theme of this year's report is Health and this reflects our commitment to a Health in all Policies approach. Highlights include:
- Working in collaboration with other district councils and the Norfolk & Norwich University Hospital (NNUH) to plan and resource the District Direct project.
 - The Bike, Walk, Scoot Club encouraging young people in Hellesdon to take active journeys to school enabling them to stay healthy and improving readiness for learning.
 - The delivery of 237 new affordable homes products including; Affordable Rent Tenure, Discounted Market Sale and Shared Equity products.
 - The introduction of a mentoring programme for staff.

11 OPTIONS

- 11.1 The Cabinet has the following options:
- (1) consider and approve the appended report for publication; or
 - (2) consider the appended report, make amendments and approve for publication; or
 - (3) take any other course of action, keeping in mind the requirements of the Public Sector Equality Duty as detailed in paragraph 3.2.

Matthew Cross
Deputy Chief Executive

Background Papers

None.

For further information on this report call Victoria Parsons on (01603) 430457 or e-mail victoria.parsons@broadland.gov.uk



Equalities at Broadland District Council

Public Sector Equality Duty Annual Report

2017

1. Introduction

The Equality Act 2010 gave a formal requirement to all Local Authorities to comply with the Public Sector Equality Duty (PSED). That is, in the exercising of our functions, Broadland District Council must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
- Foster good relations between people who share a relevant protected characteristic and those who do not share it.

There are nine protected characteristics contained within the Act; Age, Disability, Gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation, marriage and civil partnership.

In order to comply with this we believe as a Council, that we should;

- Treat people fairly, justly and with respect in both employment and service provision
- Find ways to support those who are disadvantaged or excluded
- Promote inclusion and celebrate diversity.

Suffrage Pioneers

To celebrate 100 years of women receiving the vote, the Women's Local Government Society (WLGS) are seeking 100 pioneers who were suffragists across the country and who deserve to be recognised. Successful nominators would have the opportunity to hold community events to celebrate and commemorate the local pioneer followed by work to encourage the next generation to participate in civic life.

The council put out a call to residents to nominate any previously unknown women and supportive men who took part in the suffragette movement and also undertook research to identify any prospective nominees. As a result, four nominations have been made in relation to women who have a connection to Broadland. Three nominations were made by the council and one by the Norfolk Museums Service. One of the nominations has been included as a Cameo on the Suffrage Pioneers website. We await to hear the results of our nominations.

Norwich Pride

During the Pride celebrations that take place in Norwich in July, Broadland is proud to fly the Pride flag in support of LGBTQI residents and visitors to the area. It is hoped that the flag is seen by people travelling into Norwich to take part in the events.

2. Corporate Equalities Group (CEG)

The Corporate Equalities Group at Broadland acts as a mechanism through which equalities issues and equality related activities and work can be disseminated, discussed and devised. The group is made up of cross-departmental representatives including a Unison Equalities representative and two elected Members, they provide a link between the group and Overview and Scrutiny Committee. Meetings are quarterly and chaired by the Deputy Chief Executive.

Equality Objectives 2015-19

The Broadland District Council Equality Objectives are;

1. Support the vision for Broadland District Council of *'Growing a strong and vibrant Broadland to give more jobs, more homes and more opportunities for all'* and ensuring that equalities are embedded in part of the 'day to day' work at Broadland.
2. Work in partnership with other organisations to ensure that equalities are at the forefront of our decision making and service provision.
3. Remain people focused through our values. Customers, staff, members and partners are treated fairly and respectfully.
4. Promote and share our equalities work and demonstrate how this benefits the district in relation to our ambitions. Encourage and respond to feedback.

Equality Actions 2017-18

It was agreed by the CEG, on publication of its objectives for 2015-19, that it was necessary to develop a yearly action plan in order to provide focus on and demonstrate fulfilment of these. The purpose of this would be to engage in specific activities that would progress our equalities work and ensure that we continue to work towards achieving our ambitions.

The actions for 2017-18 were:

1. Connect with religious and faith groups in the Broadland area
2. Consider a Health in all Policies (HiAP) approach – explicitly taking into account the health implications of the decisions we make.
3. Update the Single Equality Scheme to instead be presented as a clear Plan on a Page
4. Work in partnership to better understand mental health issues for children and young people

Reepham High School Mental Health event – Reepham 'Grow Your Community' Network

Working in partnership with the Town Council the network were successful in a application to Advisory Board for a small grant of £700. Following further work with the Head of Personal and Social Education (PSE), Reepham High School and Broadland's Early Help Hub's Community Capacity Coordinator, a Mental Wellbeing Roadshow was planned. This delivered a high impact, one-off event engaging large numbers of young people in mental health issues. It is estimated that between 300 to 350 pupils and 20+ adults/parents attended the event.

A number of organisations attended displaying information relating to their service/s and speaking to the young people about the range of support they could provide. Pupils had work sheets to enable them to write down contact numbers and the support available – they took these away with them. The work sheets acted as an ice-breaker and gave the pupils a reason to ask questions and prompted conversation.

246 feedback forms were completed and handed in – this is an excellent returns rate of around 66%. Of these 66% or two-thirds of attendees felt that they had learnt something new, whilst another 22% thought maybe or were not sure and 40% felt that their attitudes to mental health and wellbeing had changed as a result of what they had learned, whilst another 37% thought maybe or were not sure.

Other work undertaken towards these actions will be detailed throughout this paper.

The CREB and the CREN

Broadland District Council has representatives at both the Norfolk Community Relations and Equalities Board, attended by the Deputy Chief Executive, and the Community Relations and Equality Network which is attended by the Housing, Health & Partnerships Officer. Both groups have multi-agency membership with the CREN predominantly a practitioners group and which provides a platform for representatives to learn and share best practice.

3. Our workforce

As of 31st December 2017 Broadland employed 245 members of staff, a shrinkage in the workforce of 7.5% since March 2016. Of these 163 (67%) are women and 82 (33%) are men.

	Male permanent	Male Temp	Female Perm	Female Temp	Total
FT	63 (63)	2 (3)	61 (71)	5 (4)	131 (141)
PT	16 (17)	1 (1)	93 (98)	4 (8)	114 (124)
Total	79 (80)	3 (4)	154 (169)	9 (12)	245 (265)

(Figures in bracket denotes staff numbers as at March 2016)

Just over half – 53% of all staff are full time with 95% of those employed on a permanent contract. In terms of ratios between those full time and part time employed, 79% of all males are employed full time while 40% of all women are employed full time.

Three times more women than men are employed on a temporary contract. However this is broadly in line with the female/male staff ratio and the total number of staff members on temporary contracts is small, only 6%.

Broadland employs 16 disabled staff (7% of total employees) and is a member of the government Disability Confident scheme at Employer level. Seven members of staff identify as having an ethnicity other than British.

Numbers of employees requesting non-pay benefits are given below. It is interesting to note that a slightly greater proportion of males utilise the childcare salary sacrifice scheme. In addition, female members of staff appear to place a higher value on the provision of annual leave.

2016/17	Males		Females	
Non Pay Benefits	Number	%	Number	%
Flexible Working requests	3	3.8%	10	5.5%
Childcare Salary Sacrifice	7	8.9%	9	5.0%
Buying Annual Leave	5	6.3%	21	11.7%
Selling Annual Leave	4	5.1%	3	1.7%
Norfolk Rewards	28	35%	108	57%

Pay and Progression

Section 79 of the Equality Act 2010 requires organisations of more than 250 employees to publish pay data by gender. The data provided below relates to the 2016/17 year.

Gender Pay Gap at snapshot date of 31 March 2017	Mean (average) gross hourly pay	Mid-point (median) gross hourly pay
Males	£17.89	£16.09
Females	£13.10	£11.98
% difference	26.8%	25.5%

The Council has a total of 13 Local Grades (LG) however as the top 4 grades (Local Grades 1 – 4) are predominately filled by males, the average hourly rate is positively influenced in favour of males. The average hourly rate is positively skewed in favour of males based on the numbers of males and females in the senior roles rather than males being paid more for doing similar roles to females.

The opportunity to increase the number of females in senior roles will be dependent on relevant vacancies arising. In 2016/17 only one manager role (LG7 or above) was recruited to. This was filled by a female at LG7.

Mentoring programmes

In 2016 the female head of service completed a Women in Leadership course. An outcome of this is that she proposed the introduction of a structured mentoring programme. This was agreed by the Corporate Leadership Team and a programme introduced in April 2017. This supports both male and female members of staff throughout different stages of their career to reach their full potential. At the time of reporting 6 males and 12 females have committed to being a mentor and through the appraisal process and electronic communications to all staff, 5 female and 4 male mentees have been matched with one of those mentors.

In addition to this during 2017, the female Development Manager undertook a programme of external mentoring with nelson spirit.

In terms of internal staff movements, 30 members have staff changed roles - 25 females and 5 males – during 2016/17. Of these, 21 of the role changes were promotions with 16 female and 5 male members of staff being successful in their applications. 4 members of staff were providing maternity leave cover, 5 were providing secondment cover and 3 members of staff had temporary contracts migrated to permanent roles.

Councillors

Broadland has 47 Councillor Members, of these 11 (23%) are women, which is an increase of 1 from the previous year; there is 1 female Cabinet Member out of a membership of 6 and a female Vice Chairman of the Council.

3 Councillor Members identify as having a disability or long-term health issue and 1 Councillor Members identities as being from a Black, Asian and Minority Ethnic (BAME) background.

The age of Councillors ranges from 23 years to 86 years with a median age of 62 years

4. The State of Broadland

The following section provides a snapshot of the Broadland population; the data is taken from the 2011 Census unless otherwise indicated.

Figures from Norfolk Insight state that the Broadland District Population in 2016 is estimated at approximately 127,400, this represents a rise of around 2,750 since the last census. It is estimated that 51% of the population identify as female and 49% identify as male.

Population by age

The chart below demonstrates a breakdown of the population by age category.

2016	
Age bracket	Number
0-4	6100
age 5-9	6800
age 10-14	6500
15-19	6900
20-24	5600
25-29	6000
30-34	6200
35-39	6800
40-44	8000
45-49	9600
50-54	9800
55-59	8700
60-64	8200
65-69	9600
70-74	7700
75-80	5900
80-84	4500
85+	4500
Total	127400

The age bracket featuring the highest number of residents is the 50-54 age group (as opposed to the 45-49 age group last year). The 65-69 age category also features as a highly populated age group.

54% of the Broadland population is approximately of working age, while those aged 0-19 make up 21% of the population and 25% is aged 65+.

Current life expectancy statistics put female life expectancy at 84.4 years and 80.6 years for males, a very slight decrease on last year, however both of these figures are slightly higher than the Norfolk, East of England and England averages.

In terms of living in good health, statistics show that in Norfolk men can expect to live to age 64 in good health and women to age 66.

Ethnicity

	White	Mixed	Asian or Asian British	Black or Black British	Other Ethnic Group
Figures in %	97.7	0.9	1.0	0.3	0.1
Total no of people	121,795	1064	1,265	331	191

Census 2011 data

The percentage of Broadland residents who are white has fallen since the previous Census in 2001. The percentage of people who are from Mixed or multiple ethnic groups has doubled whilst the percentage of residents who are Asian or Asian British has tripled.

95.8 percent of Broadland residents were born in the United Kingdom. Of the 4.2 percent of Broadland residents born outside of the UK more than one third have moved to the UK in the last 10 years, twice as many in the 10 year period previous to that.

Religion and Belief

Religious diversity is more prevalent in Broadland as a wider range of faiths are being observed by the population.

	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	No religion	Not stated
Percentage %	63.3	0.3	0.2	0.1	0.3	0.1	0.4	28	7.4
Total No. of people	78,938	342	252	117	377	72	508	34,845	9,195

Census 2011 data

Christianity remains as the majority religion for Broadland residents; however there has been a decrease in residents who state that they are Christian since the 2001 Census. From a comparative viewpoint, Broadland has a moderately higher Christian population compared to the Norfolk average of 61%. All religions, other than Christianity, are broadly commensurate with the percentage totals for Norfolk with the exception of 'Muslim' being 0.6% compared to Broadland's 0.3%.

The numbers of people stating they have 'no religion' forms nearly one third of the Broadland population and is an increase on the 2001 Census.

Marriage and Civil Partnership

	Single, (Never married)	Married	Same Sex Civil Partnership	Separated	Divorced	Widowed
Percentage %	24.5	55.7	0.2	2.0	9.5	8.1
Total No. people	25,397	57,687	189	2,088	9,885	8,411

Census 2011 data

The 2011 Census shows that of the Broadland population who are legally old enough to marry, comprising approximately 104,000 of the population; just over half have entered into a heterosexual marriage. In addition to this, one fifth of the population has been married previously but are no longer and just less than one quarter have never been married.

At the time of the 2011 Census the data informs us that there were 189 couples in Broadland who have entered into a same sex Civil Partnership, although assumptions cannot be made that this data means that 0.2% of the Broadland population are lesbian, gay or bisexual.

We do not currently have up to date statistics on the number of same-sex marriages that have been entered into by Broadland residents. However the Office for National Statistics states that nationwide between 29 March 2014 – 31 December 2014, 4,850 same sex marriages had taken place, of these 2,721 were between female partners and 2,129 were between male partners.

Disability, Transgender, Pregnancy and Maternity

The Council does not have information on the above characteristics.

5. Our services

The systems thinking approach is firmly embedded within the services that are offered to all those who live, learn and work in the district. For example, within the Housing Options service the purpose is understood from the perspective of the service user as *Understand my housing problem and help me to solve it* and for the Environmental Protection team *Keep my area safe, clean and peaceful*.

Underpinning the delivery of our services are six ambitions that seek to highlight our values and achieve our vision of:

Growing a strong and vibrant Broadland with more jobs, more homes and more opportunities for all.

The following sections examine the six ambitions and provides examples of the work undertaken by Broadland and our partners to address equality issues within this.

The issue of Health, although an ambition in its own right could be viewed as a linking theme throughout this section of the paper reflecting our commitment to Health in all Policies. In addition it is also worth noting that many of the activities and services mentioned achieve in more than one ambition and this highlights the universal approach adopted by Broadland.

Ambition 1 - To deliver economic success in our area

- To back Broadland Businesses by providing information, help, advice and guidance to help them grow and prosper.
- To support the people of Broadland and their communities by increasing their skills and/or employment prospects.
- To generate and commit investment to ensure development provides the necessary infrastructure, homes and opportunities for Broadland residents.
- To broaden the scope, impact and significance of joint working through partnerships.

Choices Programme

The 12 week programme offers people with long career breaks the chance to boost their confidence, while improving their CVs, English, maths and computer skills.

Research undertaken by officers found a lack of self-esteem, lack of confidence and people thinking they don't have any skills to offer impacted on their success rate in applying for the jobs they wanted.

To counter this, the programme offers a personal and more holistic approach to get people back into volunteering or work experience and give them the confidence to apply for jobs. Attendees have stated that the course has really improved their confidence and made them realise they have many transferable skills employers are searching for."

It has been noted that women are the predominant attendees on the course and discussions are being held to look at how the course can be presented to make it more engaging for men.

Community at Heart Grants

From October 2017 the community grants process was changed with the council working in partnership with Norfolk Community Foundation to administer the grant funding.

Grants offered are:

- Broadland Community at Heart Capital grants which will fund 50% of eligible capital project costs up to maximum award of £5,000.
- Broadland Community at Heart Activities grants which will fund 50% of eligible project costs up to a maximum award of £2,000.
- Broadland Community at Heart Small grants can offer up to £500 with no match-funding requirement, in support of a variety of small, locally-led projects

Eve's Veg Co

The project, located near Booton was been set up with the aim of growing vegetables to be sold locally and to run both volunteer and training programmes for people to learn more about producing.

Awarded a £500 grant during the summer of 2017 the money has allowed them to establish volunteer days, buy tools, compost and seeds and pay for some volunteer expenses like bus fares. The grant was also a stepping stone to other grant applications."

During 2016, the project worked with more than 100 volunteers, some wanting to improve their horticultural skills, others who were in recovery from mental illness and others who wanted more formal training to help aid a career change.

Ambition 2 – To achieve environmental excellence in everything we do

- To minimise waste and maximise recycling.
- To improve energy efficiency and increase the uptake of renewable energy throughout the district.
- To keep Broadland clean and tidy.
- To broaden the scope, impact and significance of joint working through partnerships.

Dementia Friendly Waste Collection Calendars

Following attendance at an in-house Dementia Friend's sessions, the Environmental Contracts Officer became aware of a reported increase in the number of calls being received into the contracts section within Environmental Services from residents showing confusion over their weekly waste collection arrangements.

As a result, a simple Dementia Friendly Waste Collection calendar was designed and can be issued to residents on request. The calendar is printed on plain paper and lists the dates of collections in clear type without showing graphics or service advertisements that could detract from the waste collection message.

Ambition 3 – To plan and provide well housed communities

- To generate and commit investment to ensure development provides the necessary infrastructure, homes and opportunities for Broadland residents.
- To maximise the delivery of homes people can afford
- To raise the quality of existing homes
- To understand people's housing problems and help solve them
- To broaden the scope, impact and significance of joint working through partnerships.
- To address the needs of the older population to ensure they can continue to live independently.

- To help support and protect vulnerable residents

Affordable Housing Delivery

The Government White paper *Fixing our Broken Housing Market* published in February 2017 states clearly:

'The Housing Market in this country is broken... Since 1998, the ratio of average house prices to average earnings has more than doubled. And that means the most basic of human needs – a safe, secure home to call your own – isn't just a distant dream for millions of people. It's a dream that's moving further and further away...As recently as the 1990s, a first-time buyer couple on a low-to-middle income saving five per cent of their wages each month would have enough for an average-sized deposit after just three years. Today it would take them 24 years

In Broadland, data shows that the average house price stands at £236,759 while the average salary is £23,629.¹

Of the 56,300 dwellings in Broadland, fewer than one tenth (5,409) are socially rented and as of 31st March 2017 there were 2,854 households on the housing list.

The provision and delivery of affordable homes on new housing developments can be a means through which Broadland residents can access housing. In the 2016/17 financial year, 644 new properties were completed across all tenures, 37% of these can be categorised as an affordable home product equating to an overall delivery of 27% affordable rent tenure and 10% affordable home ownership. A further breakdown can be found below:

Tenure Type	Number for 2016/17 year
Affordable Rent Tenure	176
Affordable Home Ownership	61
Total affordable home products	237

New Homes Survey

The council had undertaken a New Homes Survey in 2015, based on homes completed between 2011-2013 with a repeat being undertaken in early 2017. Questionnaires were sent to occupiers of new homes completed between January 2014 and June 2015.

The main aim of this survey was to collect responses from residents relating to their opinions of their new homes and surrounding area. As part of this survey, questions focussed on a range of areas including: property tenure; where they had moved from; household composition and needs; property types and design; external space and access to local services and facilities. Additional questions asking for feedback from residents on their expectations of the new property were added.

In total, 141 responses were received from households living in 17 of Broadland's Parishes. The response rate was 25%.

When looking at ownership of properties compared to age groups, a reduction in ownership with a mortgage in the 18-30 group in 2017 was noted compared to 2015, with an increase

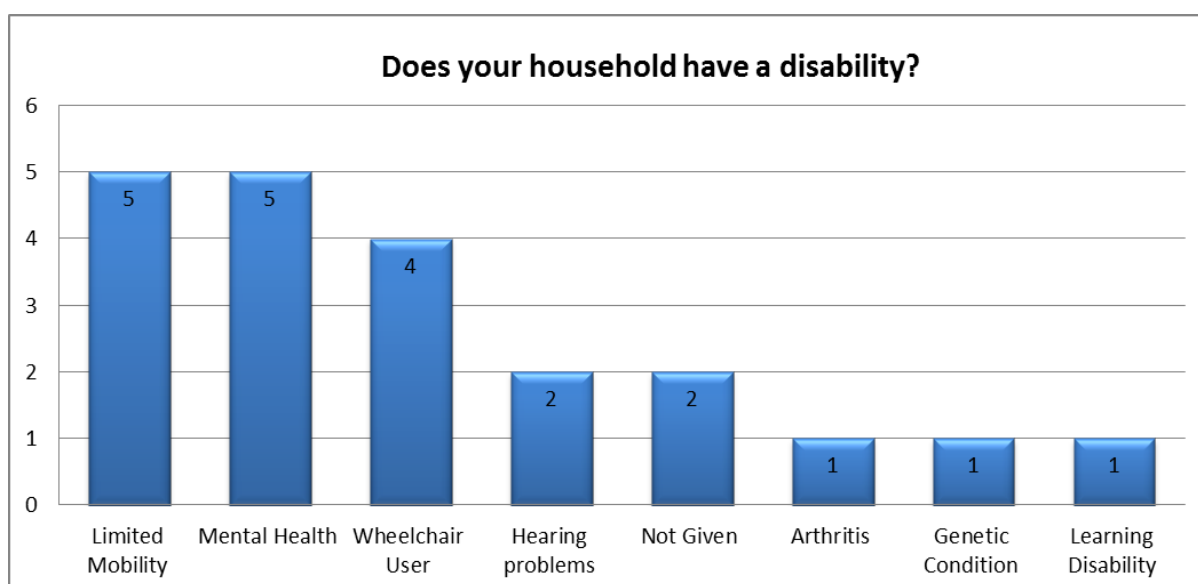
¹ (Source: Home Truths 2016/17 National Housing Federation)

in numbers renting from Housing Associations. This may reflect the increased numbers of affordable houses being built and difficulty getting into the housing market for under 30's.

There were a smaller number of private renters in 2017 compared to 2015 and increased numbers of Shared Ownership and Help to Buy purchased in 2017, particularly in 18-30 and 31-45 groups. As with the 2015 survey, the majority owned outright in 2017 were by the 60+ age group and there was no householder aged 60+ with a mortgage in the 2017 survey.

The Equality and Human Rights Commission launched an Inquiry into Housing for Disabled People at the end of 2016. The outline for the enquiry mentions not only the difficulty experienced by people with a disability in accessing suitable housing but also the support that is available to enable them to live in their homes. To enable a clearer picture from a Broadland perspective, findings from the New Homes Survey detailed how well the needs of disabled people were met with their new property with 15% (21 households) of respondents reporting a household member having a disability.

A table showing the types of disability indicated in the responses is given below.



It was also reported that 5 homes (24%) were adapted to meet the needs of the residents and 85% of households with a disabled resident stated that their individual disability requirements were met by their new home.

Some respondents commented on their individual disability giving information on their living situation and what changes had been made to their properties as follows:

- Low level shower
- Handrail, bath seat, pillow riser, garden all shingled and paved
- Larger shower instead of bath
- Wet room

46% were aged 60+ (15 households) with 57% (12 households) renting from a Housing Association and 43% (9 households) owning outright. No respondents with a disabled resident reported owning with a mortgage or private renting.

52% of respondents lived in houses with 48% living in bungalows, with the majority of households living in either two or three bedroom properties.

To examine this further, during 2018, we will be undertaking a deep dive exercise into housing needs for older people, including types of housing older people have indicated they would like to live, availability, current demographic trends and also perception vs. reality of older people's housing.

Ambition 4 – To increase levels of health and wellbeing

- To back Broadland Businesses by providing information, help advice and guidance to help them grow and prosper.
- To address the needs of the older population to ensure they can continue to live independently.
- To support the people of Broadland and their communities by increasing their skills and/or employment prospects.
- To improve energy efficiency and increase the uptake of renewable energy throughout the district.
- To raise the quality of existing homes
- To address the needs of the older population to ensure they can continue to live independently.
- To reduce the incidence of crime and anti-social behaviour (ASB) by targeted action.
- To promote healthy lifestyles and encourage behaviour change
- To help support and protect vulnerable residents
- To broaden the scope, impact and significance of joint working through partnerships

Local Public Health Offer (LPHO) and HIA+

Since 2015 the council has been working in partnership with Public Health Norfolk to identify shared priorities using district focussed evidence gathered by both organisations. Funding from Public Health, £17,142 per year for 3 years, can be used to initiate resulting activity in addition to any match funding provided by the council.

For the 2016/17 year, funding has focussed on extending delivery of a pilot HIA+ project. The 3 month project was initially set up using Disabled Facilities Grant (DFG) funding, in conjunction with the Aylsham Surgery, the North Norfolk Clinical Commissioning Group (CCG) and the Integrated Care Coordinators (ICCs). A Home Improvement Agency (HIA) Officer was identified as a conduit through which the wider support offered by district councils and the VCSE sector could be accessed.

Patients would be referred by GPs via ICCs or the Multi-Disciplinary Team meetings (MDTs). There is no age requirement to a referral instead patients identified would be those who may have higher than average presentations to the GP and who require a variety of interventions to help them and to remain supported in their own (or suitable) home.

Examples of interventions include:

- Applying for Personal Independence Payment (PIP) to be reassessed.
- Completing a housing needs report and discussing application for Sheltered Housing
- Contacting utilities companies to change to more suitable tariff or for grant for works
- Speaking to charitable organisations for grant funding

The original pilot was felt to be successful and it was further agreed to draw on the Local Public Health Offer (LPHO) funding to re-site the project at the Drayton Surgery for a further 6 month period and latterly, a surgery located in Thorpe St Andrew, which falls under the remit of Norwich CCG.

While referrals were slow initially, the first 6 months (Aylsham followed by Drayton) saw approximately 50 referrals to the service. An evaluation of the project in collaboration

between the council, Public Health, North Norfolk CCG and the University of East Anglia (UEA) is underway.

Physical Activity for Young People

Reports suggest that engaging in physical activity helps children and young people increase their self-esteem, resilience and ready them for learning and a recent study undertaken by Public Health Wales and Bangor University further suggests that children and young people who have experienced adverse childhood experiences but regularly played sport as children were less likely to have a mental health illness as an adult.²

The council is currently looking at work to improve resilience and self-esteem in young people and two examples utilising physical activity that can help to achieve this are given below:

Bike, Walk, Scoot Club

The club was launched in two Hellesdon schools with the aim to encourage young people to take active journeys into school. Members of the club commit to making at least three active journeys per week and this enables them to stay active and healthy and to arrive at school calm and ready to learn.

Club members receive a branded hi-vis jacket, fluorescent band, certificate of membership and a badge.

Safe parking areas away from the schools have been identified to ensure that members can have an active element to their journey. This also decreases hazards and traffic congestion around the schools at busy points of the day. It is hoped the project will roll out to other local schools.

Marriott's Way Children's Fun Run

2017 saw the first ever Marriott's Way Fun Run for young people. Scheduled to take place on the same day as the annual 10k race the run for young people aged four to sixteen covers a one mile circular route in Aylsham. Encouraged to wear fancy dress, 40 young people took part with all of them receiving a Children's Fun Run medal.

The Integrated Mental Health Team

During 2017 the council contributed funding to the Integrated Mental Health Team (IMHT) located within the main police call centre at Wymondham HQ. This service can be accessed by Broadland District Council staff members to report or refer concerns they may have about residents they are working with.

The team consists of a Mental Health Team Leader and 5 Mental Health Nurses, with experience in working with Autism, Asperger's, self-neglect and hoarding, drugs and alcohol. The IMHT can access multiple information systems such as police records and Adult Social Care information which enables them to make informative and timely decisions when ascertaining next steps in collaboration with the reporting officer.

Feedback from staff members who have accessed the service includes:

I've had a couple of positive experiences now with the (IMH) team including yesterday when they came to our offices and carried out an assessment on a client who has high support

² Public Health Wales 2018

needs. An action plan has been put in place. They've also been able to share with me over the phone whether a client is known to services if we have concerns. This has been very useful in being able to identify if a client already has support and if so sharing concerns with them. Definitely a worthwhile service for us to be involved with.

In addition to this in early 2017, the IMHT facilitated in-house training at the council offices which was attended by front line members of staff in Benefits, Housing & Environmental Services and Economic Development. The aim was to raise awareness and confidence around the different types of Mental Health Disorders, if/what people can do to help, issues of confidentiality and mental capacity.

Ambition 5 – To keep people safe and secure

- To address the needs of the older population to ensure they can continue to live independently.
- To reduce the incidence of crime and anti-social behaviour (ASB) by targeted action.
- To broaden the scope, impact and significance of joint working through partnerships.

Extension of Handyperson+ Service

The Handyperson+ service remains popular and is a central aspect to the success of the District Direct service in Broadland (below). Earlier in 2017 the decision was made to expand the criteria of the service to enable more people to access the interventions and advice available through the Handyperson.

Previously the service was only open to those aged 65+; this was expanded to include those of any age in receipt of Incapacity Benefit, Personal Independence Payments (PIP), Disability Living Allowance (DLA), Attendance Allowance and people who are registered blind. As before the labour charge for the service remains unless the client is in receipt of means tested benefits. The grant funding available for interventions following an assessment by the handyperson also increased from £10 to £100. The funding is available once per applicant and can include safety measures such as the installation of door chains and grab rails within the home and key safes to the exterior of the home.

Safeguarding

Following completion of the council's annual S.11 audit set by Children's Services it was agreed to undertake a programme of refresher safeguarding training. Also due to staff turnover a new cohort of designated safeguarding officers was identified. This training took place in January and February and was attended by an estimated 90 Officers.

Early Help Hub Collaboration Meetings

The Broadland Early Help Hub is well established and new partners joining us throughout 2017 include Care Connectors from Carers Matter Service supporting unpaid carers and a Housing Support Link worker (TA).

The hub holds weekly collaboration meetings which are well attended. They are an opportunity to meet hub partners and to find out more about current issues or services. Recent briefings have discussed Operation Gravity, Scams Awareness and the new Drug and Alcohol recovery provider, Change, Grow, Live. Importantly, the collaboration meetings enable a safe space with which to discuss cases. This ensures a holistic and joined up approach to supporting individuals and families.

Project Root Causes

Root Causes was developed in late 2016 and has been running since early 2017. Through this work issues of hoarding and/or extremely unkempt gardens have been identified as contributing to the problem of people who have mental health and/or substance misuse problems. It is well evidenced that these issues can make an individual more likely to either commit anti-social behaviour or be targeted and become a victim of crime. However, when an individual is a property owner, there is little or no help available to them without payment.

In the cases identified thus far, the individuals do not have the financial ability to make payment and neither are they receiving or engaging with support services and so the problem continues to worsen.

The council is continuing with the project to provide a solution by engaging with the Community Payback Scheme to clear the unkempt and overgrown gardens and declutter the property. This will improve the look of the area for the immediate neighbours and reduce the individual from being identified as vulnerable. The work is undertaken free of charge by the Community Payback Team, however, we will incur the costs of providing a skip (£100 each) and portable toilet provision (£60) at the location.

In exchange for this work, the individual will be encouraged to engage with the appropriate and relevant support services to prevent the issue reoccurring in the future and to reduce their vulnerability of further becoming a victim. Additionally, family and friends are also encouraged to engage and support the individual moving forward.

A total of 6 individuals have been assisted with this project and all are continuing to maintain their properties and reduce their hoarding and 3 more individuals are currently being worked with. Where possible, individuals are making a financial contribution towards the costs of providing skips.

The project process is also being used to assist a tenant who meets the criteria with the exception that they do not own their property. However, because the process is streamlined and effective and the individual has engaged well, the registered provider has agreed to reimburse the Council for the costs of the skips and toilet facilities.

The project continues to be monitored by:

- revisiting each person who has been assisted to assess whether they are maintaining their property
- monitoring their calls for assistance;
- receiving updates from support services about their continued engagement.

Ambition 6 – To continue to provide high quality, value for money services on our own or as a trusted partner

- To effectively manage our finances.
- To use system thinking principles to improve services, maximise new income streams and deliver savings and efficiencies.
- To maximise staff engagement.
- To broaden the scope, impact and significance of joint working through partnerships.

District Direct

Broadland, South Norfolk, Norwich City, Breckland and North Norfolk Councils are working with the Norfolk and Norwich University Hospital to identify patients who are at risk of a delayed discharge and put in action plans to ensure they have suitable discharge plans to prevent re-admission.

The current discharge team includes both health and social care staff. District Councils being included within these services, widens the remit of the discharge team increasingly into the wider determinants of health. In addition, Housing, employment, benefits and adaptations all have a significant impact on the health and wellbeing of a patient, particularly when they are vulnerable following an inpatient stay. Identifying potential issues or adaptations that could begin to be resolved prior to hospital discharge would allow for the smooth transition to returning to living in the community.

The pilot project, where the five councils (above) have each committed to place – or fund – a member of staff in the discharge hub one day per week, commenced in September for an initial 12 week period. However, owing to the success of the project this has since been extended to the beginning of March while long term funding options are considered.

An evaluation with the University of Essex is underway, however an interim report highlights that 80 patients had been supported through the project with 132 interventions taking place. The age range of patients ranged between 31 and 96 with the average age being 71.

The most prevalent interventions put in place are:

- Installation of a key safe
- A referral for assessment by the Integrated Housing Adaptations Team (IHAT)
- Application to the housing register in their district
- Installation of grab rails

For the period 11th September – 9th December 2017 the number of bed days saved was 203 (5 day week) and saving £40,600. Over the course of a year (7 day week) this could lead to a saving of £262,800.

Community at Heart

Adopted in 2017, Community at Heart takes a whole council approach to getting more closely involved with our communities, building productive relationships and raising awareness of key initiatives between communities and ourselves.

The aim is to encourage everyone to always think of the impact their work or decision will have on the Broadland area. It also aims to build more trust and understanding for residents in terms of the role of the council and see first-hand the work of the councillors they voted for.

As part of this, and as an extension to the Grow Your Community project, a new role was developed – Community Projects Officer. Located within the Communications team, the role has a remit to: deliver community engagement projects and to support the Community at Heart initiative; establish connections with Broadland communities to support their community goals and aspirations; lead on connecting departments to deliver the ambitions of Community at Heart initiative.

The first cross-departmental Community at Heart meeting led by the Community Projects Officer took place in early January.

Looking forward

A significant project being undertaken in early 2018 is the re-drafting of the council's Equalities Impact Assessment document and guidance.

The aim is to move away from a tight question and answer approach to a narrative format that encourages those completing the form to think of the wider impacts the prospective policy may present. Emphasis is also being made on how/if potential impacts can be mitigated and the review process once a policy has been implemented will be examined.

In line with the HiaP and Community at Heart approaches, the EIA will ask those completing it to consider *Health*, *Rurality* and *Deprivation* as characteristics in addition to those protected by the Equalities Act.

The EIA guidance will be refreshed in order to open up thinking around potential impacts earlier in the policy process.

Other events/activities that are taking place in 2018 and will be reported on in the next annual update include:

- Embedding of the Community at Heart and HiaP approaches
- Introduction of the Homelessness Reduction Act
- Full Digital Service rollout of Universal Credit
- Implementation of the Stop Hate in Norfolk (SHiN) protocol
- Review of the Equality Objectives 2015-19 and progression of work to determine objectives for 2019-2023.

NOT FOR PUBLICATION BY VIRTUE OF SCHEDULE 12A OF PART 1 PARAGRAPH 3 OF THE LOCAL GOVERNMENT ACT 1972 (AS AMENDED) BY THE LOCAL AUTHORITIES (ACCESS TO INFORMATION) (VARIATION) ORDER 2006 (contains information relating to the financial or business affairs of any particular person (including the authority holding that information))

Pages 254 to 277 are not available to the public because the information is confidential as it includes exempt information about the financial or business affairs of a person



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CABINET

6 February 2018

Final Papers

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To receive the Minutes of the meeting held on 23 January 2018.

DEMOCRATIC SERVICES

Broadland District Council
Thorpe Lodge, 1 Yarmouth Road, Norwich, NR7 0DU
Tel: 01603 430428
Email: cst@broadland.gov.uk



Minutes of a meeting of the **Economic Success Panel** held at Thorpe Lodge, 1 Yarmouth Road, Thorpe St Andrew, Norwich on **Tuesday 23 January 2018** at **10:00am** when there were present:

Mr S M Clancy – Chairman

Mr J Emsell
Mr I Moncur

Mr C Harrison
Mr G K Nurden

Mrs L Hempsall
Mr G Peck

In attendance were the Head of Economic Development, the Economic Development Manager (KH), the Economic Development Manager (SS) and the Committee Officer (DM).

15 APOLOGY FOR ABSENCE

An apology for absence was received from Mrs K Vincent.

16 MINUTES

The Minutes of the meeting held on 21 November 2017 were confirmed as a correct record and signed by the Chairman.

17 LOCAL ECONOMY UPDATE

The Head of Economic Development updated Members on the main areas of activity since the last meeting as reported to the Overview and Scrutiny Committee at its meeting on 16 January 2018.

- The Job Seekers Allowance (JSA) claimant's rate in Broadland at the end of November 2017 was 485 people – this had reduced from 600 in May 2017. This equated to a "0" level of unemployment as defined by the Government. The reason for the reduction could be attributed to seasonal factors and the potential for some claimants to have found work in the tourism or agriculture sectors over the summer months. Officers would continue to monitor these statistics.
- Two Broadland Business Forum meetings had been held since the last update. On 12 July 2017 the event at Sprowston Manor Hotel had been attended by 60+ businesses with the key theme being tourism in the local area. The event on 11 October 2017 had been held at The Cottage in Thorpe St Andrew, attended by 60+ businesses with the key speaker from Archant. Events were attended by a wide range of officers to facilitate networking.

- In March 2017 the 'Buy in Broadland' voucher booklet had been sent to over 58,000 homes with Council Tax invoices to encourage local people and visitors to spend locally. The scheme had been well received with many more businesses coming forward to take part.
- The department continued to assist the Town Teams in Reepham and Aylsham and had been assisting the residents of Reedham to put together a Village Team to look at a number of local issues, including the potential for improvements to the Reedham Quay and the toilets owned by the Council.
- The Choices Group had continued to meet regularly at Carrowbreck to tackle long term unemployment and barriers to work, suggest a range of potential volunteering and work experience options (through contacts with local businesses) that could help gradually ease residents back into work. There was a high drop-out rate amongst male attendees.
- In mid-October 2017, the Council attended MIPIM at Olympia in London. This event showcased potential development and growth areas to investors from the UK and abroad and was an opportunity to build relations with potential investors.
- The Greater Norwich Manufacturing Group (GNMG) continued to grow, both in membership and reputation. Their most recent event held at KLM's facility at the airport in December 2017 was attended by 30+ business and education representatives from across the area.
- The Financial Industry Group (FIG) had hosted its second annual conference in November 2017 at the UEA. Speakers were drawn from a range of industry experts and had been well received. FIG had expressed a desire to engage more closely with Local Government and the LEP and this initiative was being enabled by the Economic Development Manager (Partnerships & Growth).
- The Norfolk Better Business for All (BBfA) initiative had been launched November 2017. Economic Development Officers had played a key part in supporting and promoting the initiative which sought to bring together 'regulators' from across Norfolk and Suffolk to offer businesses a cohesive, consistent and supportive service to enable them to prosper with the minimum of 'red tape'. Broadland's Chief Executive had given the key note speech at the launch and had agreed to act as the Local Authority Lead for implementation of the initiative in Norfolk.
- In December 2017 the Vice-Chairman, Leader and Cabinet Members had joined Economic Development staff to celebrate Small Business Saturday 2017, visiting a number of small Broadland businesses during the day and listening to their experiences of operating in Broadland.

- Tots2Teens –1,452 places had been taken in Summer 2017, 199 places in October half term and 195 places in Winter. The scheme continued to be a popular and valuable service to local communities with excellent feedback.
- Broadly Active - in the third quarter of 2017/18, Broadly Active received another 117 referrals taking the total for this year to over 400. Completion rates were around 30 percent with all completed clients demonstrating an increase in physical activity levels and an improvement of at least one health indicator. Broadly Active continued to work with condition specific groups within the NHS such as the National Diabetes Prevention Programme, Cardiac Rehabilitation, Tier 3 Weight Management Services and Pulmonary rehabilitation.
- The 9th Marriott's Way run, held in October, attracted 450 runners and, for the first time included a 1 mile 'junior' run with 39 young people participating.
- Parkrun - there were now three active Parkruns operating in Broadland in Old Catton, Brundall and Blickling with an average of 700 people across the three runs. Approximately 9,000 Broadland residents were registered with Parkrun.
- Why Weight continued to deliver successful programmes across the District with schemes in Drayton, Blofield and Spixworth and Thorpe St Andrew, focussing on lifestyle changes.
- Repton 200 would be officially launched in Aylsham to start a year of nationwide celebrations coordinated by the Gardens Trust to mark the bicentenary of the death of Humphry Repton, who succeeded Capability Brown as Britain's greatest landscape gardener. Repton first worked as a landscape gardener at Catton Park and was buried at St Michael and All Angels Church in Aylsham in March 1818. A programme of events celebrating his life and work had been planned in Norfolk and around the Country and the Council's Tourism Officer had been instrumental in coordinating and promoting local events and celebrations.
- With regard to car parking, Members noted that an update had been given at the Overview and Scrutiny Committee on car parking and Members agreed that this topic should be considered further at the next meeting of the Panel. Officers noted a request for car parking issues in Acle to be included as part of the considerations.

Members thanked the Head of Economic Development for the update. They welcomed the low levels of unemployment but a comment was made that businesses looking to locate to the area may be concerned about the shortage of workers. In response, officers commented that adjoining districts

did not have the same low levels of unemployment, that there were seasonal variations in unemployment figures and different types of seasonal businesses had peak demands for staffing at different times. Also, there was significant potential housing growth over the next few years. Officers were always willing to meet with potential businesses to alleviate any fears and often larger businesses were willing to support smaller ones with staffing options. Members commented on the need to treat with caution the statistics relating to unemployment and those receiving JSA and ESA (Employment Support Allowance).

In response to a request, officers undertook to report back on the actual unemployment figures for the district, determining the levels of JAS and ESA across the district.

18 NEW ANGLIA GROWTH HUB

The Chairman welcomed to the meeting Mr Nigel Best, the New Anglia Growth Hub Manager for the New Anglia Local Enterprise Partnership. The NAGH employed 10 business advisors across Norfolk and Suffolk to deliver free, impartial advice to businesses. Their involvement included, visiting businesses, discussions with owners, diagnostic assessments and preparing actions for help and solutions.

He commented that Broadland were one of the exemplar districts in relation to Better Business for All.

The Chairman commented that the Council had been critical of the role of the LEP in the past but that relations with the NAGH had improved significantly over the last year following Mr Best's appointment. There was still progress to be made. He gave a particular example of a case where a business had withdrawn an application for funding because of the bureaucracy involved. He hoped Mr Best would continue to reduce the barriers to businesses when seeking help to grow and ensure the support was outcome driven and not process driven.

A Member made a plea for clarity in the advice being given by the LEP in terms of what types of funding/financing were available concurrently as it appeared there was inconsistent advice throughout the Country and securing some forms of financing possibly led to others not being available. He felt other areas of the Country appeared to be more experienced in this area and Mr Best sought examples of good practice which he was keen to investigate.

A further comment was made about the high levels of costs of administration and processes which reduced the funds available to the LEP for redistribution.

Mr Best added that the Business Growth Hub was only one element of the LEP but that he would share these concerns with the Partnership. Mr Best commented that much streamlining of processes had taken place, and would continue, to help reduce red tape and costs. For example, the application form had been reduced from 11 pages to 4. An application for a grant of under £10k could now be processed in a week with grants over £10k being processed in 3 weeks. He reiterated however that this was dependent on applications being complete and meeting the necessary criteria. Much more help was now available to applicants to get ready to make an application, completing the application and ensuring they met the criteria. One issue was that some businesses were not “investment ready” and needed support to get to this stage. The Chairman commented on a case he had followed recently whereby the Growth Advisor had helped to support a business to become ready for investment, assisted with their application and successfully secured a grant for them. Mr Best undertook to supply the Council with a leaflet to outline the process of applying for a grant.

Mr Best commented that the LEP’s target to secure £6.5m match funding by 2036 had now been met, way ahead of schedule. This year the LEP was seeking to secure funding from the European Regional Development Fund for a further 3 years to continue with the Growth Hub.

The Chairman commented on the close working relations between Broadland officers and Broadland businesses and that the Growth Hub Advisors should utilise these links to connect to Broadland businesses and where possible avoid unnecessary expense and duplication. The role of the County Council was much more distant from local businesses, especially SMEs.

In response to a request, Mr Best agreed to liaise with the Council’s representative on the Broads Authority regarding advice on income generation and support for businesses in the Broads Authority Area, particularly in relation to small businesses in the traditional skills industries.

With regard to businesses that were struggling, Mr Best commented that advice and support was available to all businesses including those struggling. An example of which was a business experiencing good and bad times which had been supported with a grant, one of the conditions of the grant was to meet regularly with a Growth Hub Advisor to monitor their financial situation. Efforts were made to support businesses to understand their business better.

A comment was made that, having regard to Brexit, discussions should now be taking place with appropriate government bodies with regard to sources of funding in the future other than ERDF monies.

The Chairman thanked Mr Best for attending.

19 NEW ANGLIA ECONOMIC DEVELOPMENT STRATEGY – UPDATE

The Economic Development Manager (SS) reminded Members that the Council had endorsed the Norfolk and Suffolk Economic Development Strategy and had considered how the Council could seek to influence the local delivery and implementation plans. To progress these, an exercise had now commenced to map out what was being done and what needed to be done to identify any gaps. A series of business engagement events were being held to this end. An Economic Strategy Steering Board was also being established and all the appropriate district and county councils would be represented. The role of the County Council was that of planning and prioritising the infrastructure needed and consideration of funding for this, along with addressing skills needed.

The Chairman raised the issue of the shortage of skilled workers in the construction industry and training services for these and invited the Economic Development Manager to raise these concerns at the appropriate forum.

In response to a question about funding coming into the area to support the aims of the strategy, the Economic Development Manager agreed that this would have been affected by the decision to not secure a devolution arrangement for the area. Broadland would however be in a position to demonstrate its collaborative working with South Norfolk and there had been a coordinated response to the Strategy from the two councils which would strengthen any bids for funding.

A Member made reference to the contribution made by the Broads Authority to the economy and stated that it was an important stakeholder in the delivery of the strategy and asked if they were part of the ongoing discussions. Members and officers agreed that the Broads Authority was an important stakeholder and made a huge contribution to the region and should be involved in the process. The Economic Development Manager undertook to seek further information on the position of the Broads Authority in relation to the proposals for the local delivery and implementation plans.

20 BROADBAND AND MOBILE PHONE SIGNALS

The Economic Development Manager (KH) reported on progress with the Better Broadband for Norfolk (BBFN) roll out. Efforts were now being made to roll out fibre services directly to clusters of businesses in harder to reach areas not already included in the superfast Broadband rollout. There had been a higher than expected uptake of the superfast services which would increase the level of clawback to be re-invested in proposals to try and serve the harder to reach areas remaining. It was agreed that Ms Karen O'Kane, Programme Manager for BBFN be invited to the next meeting to update Members on progress.

Whilst the rollout of superfast Broadband was progressing and over 97% coverage achieved, there were still issues with the hard to reach areas and with speeds/data capacities of alternative methods of supplying broadband services. A comment was made that there was still not open competition in relation to the provision of infrastructure.

Members had a role to play in encouraging residents to accept the short-term disruption from the installation of services for the longer-term gain and it was felt an article in Broadland News on Broadband covering some of the myths and facts about the use of Broadband might be helpful.

With regard to mobile phones, the Economic Development Manager reported on her attendance at a meeting of the County Council's Digital Innovation Committee to which representatives of the main mobile phone service providers had been invited and each had given an update of their current developments. There was an anticipated 700% growth in demand for data usage by 2021. The provision of more masts was essential and the County Council had agreed to work with the phone providers to see if sites could be made available. Concerns had been raised by the providers about inconsistencies within the planning system across the Country in relation to the approval of masts. There was also the issue of the conflict of the demand for masts to improve the service but the public objection to the location of masts. Masts proposed in areas near schools or in environmentally sensitive areas were often controversial and whilst the guidelines for such development were clear they were often interpreted very differently. The County Council had now engaged an officer to focus on this issue and liaise with planning officers. They had also commissioned their own survey of mobile phone signals throughout the county via a "van scan" to look at "notspots" and compare these to the data used by the providers. Members welcomed the collection of this data which would provide the evidence to help identify and prioritise improvements needed.

It was noted that statutory undertakers such as Network Rail had certain permitted development rights and were able to simply give notification of their intention to erect similar structures. Mobile phone providers had a much more restricted level of permitted development rights. It was suggested that the current consultation on the Greater Norwich Local Plan was an ideal time to comment on the issue of mobile phone signals associated with new developments. Mobile phone providers should be encouraged to be more open to sharing masts.

A comment was made that the phone signal at Thorpe Lodge was very weak and, if possible, officers should examine the possibility of the provision of a booster.

Members welcomed the update and noted that a further report would be made to the Panel once the data had been collated by Norfolk County Council.

21 FUTURE WORK PROGRAMME

The following were included in the work programme:

- New Anglia Economic Development Strategy – future meeting
- New Anglia Local Enterprise Partnership – future meeting
- Broadband and mobile phone signals + Ms Karen O’Kane, Programme Manager, BBFN – next meeting
- Car parking – next meeting
- Airport Master Plan – update

The Chairman raised the issue of the consultation on the Greater Norwich Local Plan and the option for the Panel to feed into this exercise. It was agreed that Members would submit comments to the Economic Development Officer (SS) who would consider these in the light of the exercise. However, Members were able to respond to the consultation as individuals.

22 DATE OF NEXT MEETING

The next meeting was scheduled for 27 March 2018 at 10:00am but three Members indicated they would not be able to attend this meeting and it was agreed to reschedule the date of the next meeting at a date and time to be confirmed.

The meeting closed at 12:15 pm