

Cabinet

Agenda

Members of the Cabinet:

Cllr J Fuller (Chairman)	Leader, External Affairs and Policy
Cllr K Mason Billig (Vice Chairman)	Governance and Efficiency
Cllr Y Bendle	Better Lives
Cllr M Edney	Clean and Safe Environment
Cllr L Neal	Stronger Economy
Cllr A Thomas	Customer Focus
Cllr J Worley	Finance and Resources

Date & Time:

Monday 19 April 2021
9.00 am

Place:

To be hosted remotely at: South Norfolk House, Cygnet Court, Long Stratton, Norwich, NR15 2XE

Contact:

Claire White tel (01508) 533669
Email: democracy@s-norfolk.gov.uk
Website: www.south-norfolk.gov.uk

PUBLIC ATTENDANCE:

This meeting will be live streamed for public viewing via the following link:

<https://www.youtube.com/channel/UCZciRgwo84-iPyRImsTCIng>

If a member of the public would like to attend to speak on an agenda item, please email your request to democracy@s-norfolk.gov.uk, no later than 5.00pm on Thursday 15 April 2021.

Large print version can be made available

If you have any special requirements in order to attend this meeting, please let us know in advance.

AGENDA

1. To report apologies for absence
2. Any items of business which the Chairman decides should be considered as a matter of urgency pursuant to section 100B(4)(b) of the Local Government Act, 1972. Urgent business may only be taken if, “by reason of special circumstances” (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency
3. To receive Declarations of interest from Members
(please see guidance – page 4)
4. To confirm the minutes from the meeting of Cabinet held on 15 March 2021
(attached – page 6)
5. Poringland Neighbourhood Plan – Final Decision Statement
(report attached – page 15)
6. Endorsement of the Norfolk Strategic Planning Framework Update
(report attached – page 44)
7. COVID Recovery Report
(report attached – page 181)
8. The Debt Respite Scheme (Breathing Space and Mental Health Crisis Moratorium) Regulations 2020 and Statutory Debt Repayment Plan (Financial Services Bill) – Request for Additional Resource
(report attached – page 223)
9. Review of Policies
(report attached – page 232)
10. Public Sector Equality Duty Annual Report
(report attached – page 281)
11. In Person Meetings
(report attached – page 296)
12. Proposals for Additional Environmental Enforcement
(report attached – page 307)
13. South Norfolk Use of the Strategic Fund
(report to follow)

14. Cabinet Core Agenda

(attached – page 314)

15. Exclusion of the Public and Press

To exclude the public and press from the meeting under Section 100A of the Local Government Act 1972 for the following items of business on the grounds that it involves the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act (as amended)

16. Managed Service - Payroll

(report attached – page 316)

NOT FOR PUBLICATION by virtue of Schedule 12A Part 1 of Paragraph 3 of the Local Government Act 1972 (as amended)

17. Growth of the Internal Audit Consortium

(attached – page 324)

NOT FOR PUBLICATION by virtue of Schedule 12A Part 1 of Paragraph 3 of the Local Government Act 1972 (as amended)

18. Ella May Barnes Building

(report to follow)

NOT FOR PUBLICATION by virtue of Schedule 12A Part 1 of Paragraph 3 of the Local Government Act 1972 (as amended)

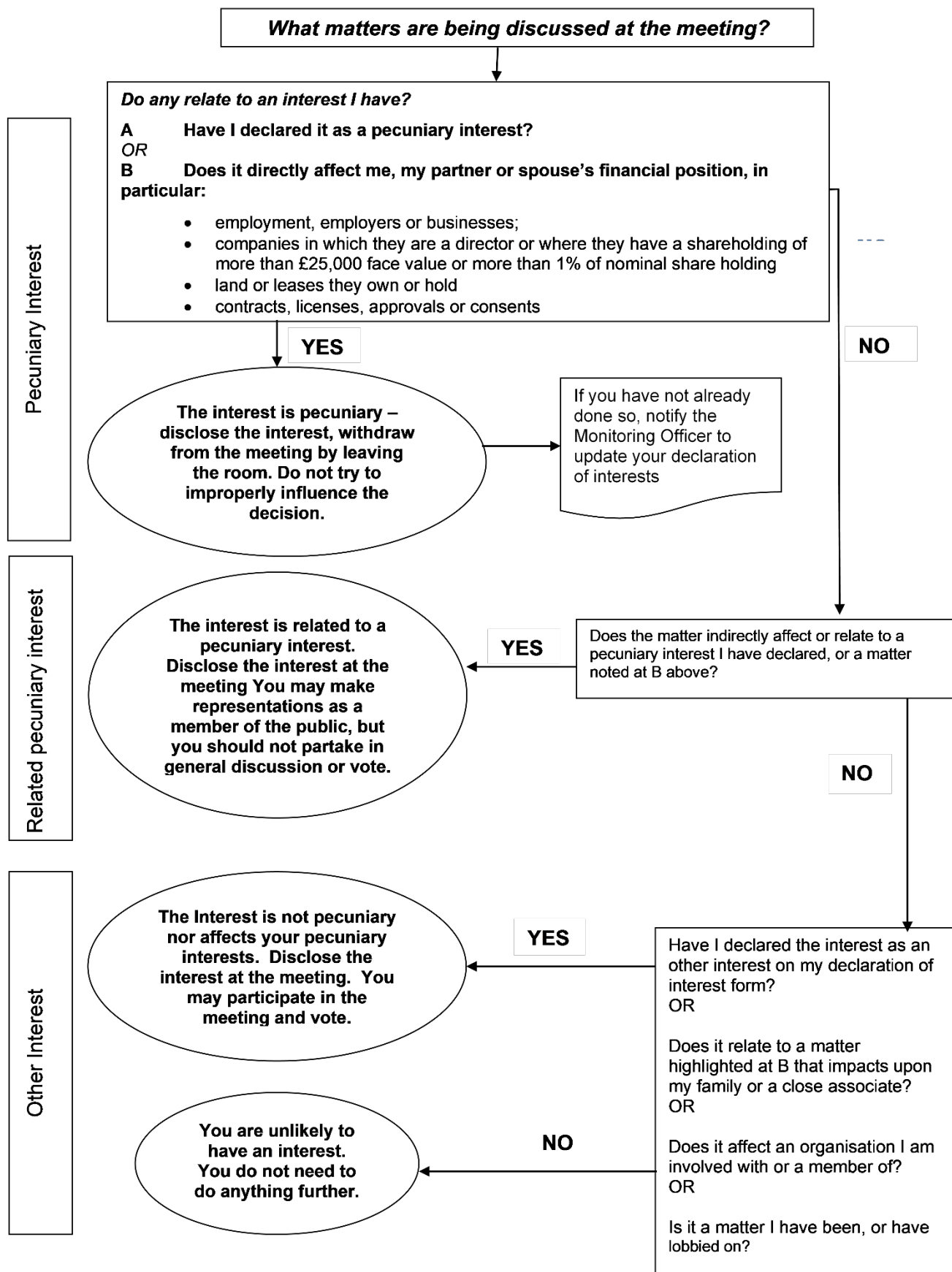
DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

<p>Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.</p>
<p>Does the interest directly:</p> <ol style="list-style-type: none"> 1. affect yours, or your spouse / partner's financial position? 2. relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner? 3. Relate to a contract you, or your spouse / partner have with the Council 4. Affect land you or your spouse / partner own 5. Affect a company that you or your partner own, or have a shareholding in <p>If the answer is "yes" to any of the above, it is likely to be pecuniary.</p> <p>Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.</p>
<p>Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?</p> <p>If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but you should not partake in general discussion or vote.</p>
<p>Is the interest not related to any of the above? If so, it is likely to be an other interest. You will need to declare the interest, but may participate in discussion and voting on the item.</p>
<p>Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.</p>

**FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF.
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER IN THE FIRST
INSTANCE**

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Agenda Item: 4

CABINET

Minutes of a remote meeting of the Cabinet of South Norfolk Council, held on Monday 15 March 2021 at 9.00am.

Committee Members Present:	Councillors: J Fuller (Chairman), Y Bendle, M Edney K Mason Billig, L Neal, A Thomas and J Worley
Other Members in Attendance:	Councillors: B Bernard, C Brown, V Clifford-Jackson, T Laidlaw and V Thomson
Officers in Attendance:	The Managing Director (T Holden), the Director of People and Communities (J Sutterby), the Director of Resources (D Lorimer), the Assistant Director of Governance and Business Support (E Hodds), the Assistant Director of Finance (R Fincham), the Assistant Director Individuals and Families (M Pursehouse), the Chief of Staff (H Ralph), the Place Shaping Manager (P Harris), the Revenues Manager (S Quilter), the Strategy and Programme Manager (S Carey), the Communities Senior Manager (K Gallagher), the Housing and Wellbeing Senior Manager (R Dunsire), the Senior Community Planning Officer (R Squires) and the Housing Enabling Officer (K Mitchell)

2875 MINUTES

The minutes of the meeting of the Cabinet meeting held on 8 February 2021 were agreed as a correct record.

2876 STRATEGIC PERFORMANCE, RISK AND FINANCE REPORT FOR Q3 2020/21

Members considered the report of the Senior Finance Business Partner and the Strategy and Programmes Manager, which provided an overview of the performance of the Council for quarter 3 of the year, against the key outcomes set out in the Delivery Plan for 2020/21.

The Strategy and Programmes Manager summarised the key areas relating to the Council's performance in Quarter 3, and the current position in relation to risks. She drew attention to a number of areas of performance and advised Cabinet of two new strategic measures that had been added to the Strategic Risk register, relating to the impact of Covid-19.

During discussion, members raised the potential increase in demand on housing services, and the Director of People and Communities assured Cabinet that the team was well prepared. The team continued to work proactively, taking a preventative approach where possible.

Turning to Leisure, the Portfolio Holder, Cllr A Thomas, referred to the recent redeployment of staff to the NHS, and advised that the Council had received exemplary reports from the hospital regarding the hard work and commitment demonstrated by staff from South Norfolk Council.

Cllr Thomas further explained that officers were working very hard in anticipation of the 12 April re-opening of the leisure centres and she also referred to the Council's on-line leisure provision, which would continue to be available after the re-openings. This was in recognition of the changing needs of customers.

The Portfolio Holder for Planning, Cllr L Neal, wished to record her thanks to the Development Management officers for continuing to maintain high standards of performance, whilst the level of planning applications received remained high and many officers were having to work from home.

In response to a query from the Chairman, the Director of People and Communities confirmed that a number of unlicensed houses of multiple occupation had been uncovered through the track and trace work, and he advised that further work was being carried out to ensure that these properties met appropriate standards, and were licenced where necessary.

Cllr K Mason Billig drew attention to the predicted savings made through the collaboration work with Broadland District Council, referring to the anticipated savings of £8.8m over the first 5 years, against the target of £8.6m. She congratulated all staff for this achievement and reminded Cabinet that the collaboration was not just about savings, but improving the quality of employment for staff, and becoming an employer of choice in local government.

The Assistant Director Finance then provided a brief summary of the revenue budget position for the Council at the end of Quarter 3, and advised that there was an estimated underspend of £2.139 million at year end. He explained that the reasons for the underspends varied, some being as a result of

additional funding from the Government, the redeployment of staff, and salary savings.

Turning to Capital, he advised that to date, the Council had spent £14.9m on capital schemes during 2020/21. Members noted that it was always expected that some schemes would take longer to come to fruition due to matters outside the control of the Council, although the capital funds were available to take them forward when appropriate to do so. The Chairman felt that given Covid-19, the capital spend on local projects was to be applauded.

The Chairman referred to a number of prudent decisions made by the Council, which he believed had helped to place the Council in a strong position going forward. The Managing Director agreed, adding that the Council needed now to focus on driving areas of the business that created a return for the Council, and would drive the economy.

RESOLVED

To:

1. Note the revenue and capital position (variance details in Appendix 1)
2. Note the current position with respect to risks and agree the actions to support risk mitigation (detailed in Appendix 2).
3. Note the 2020/21 performance for Quarter 3 (detail in Appendix 3).

The Reason for the Decision

To ensure that processes are in place to improve performance and that budgets are management effectively.

Other Options Considered

None

2877 LONG STRATTON NEIGHBOURHOOD PLAN SUBMISSION

Members considered the report of the Senior Community Planning Officer, which sought Cabinet agreement to take the proposed Long Stratton Neighbourhood Plan through to the next stages of consultation and independent examination.

The Senior Community Planning Officer outlined his report to Cabinet, explaining that the proposed Plan had satisfied the required assessment criteria. Officers were therefore recommending that the Plan proceeded to consultation, and attention was drawn to a small number of proposed representations to be submitted on behalf of the Council, as part of the

consultation process. Members noted that if approved, the consultation would commence on 22 March for a period of 6 weeks, and that the Council would seek to appoint an examiner during that time.

Local member, Cllr A Thomas welcomed the Plan and acknowledged the time and effort that went into its production by Long Stratton Town Council and its Neighbourhood Plan Team (made up of both town councillors and members of the public). She queried what the Council could do to assist the Town Council in achieving a greater level of participation during the next round of consultation.

Cllr J Worley, also local member for Long Stratton, echoed Cllr Thomas' comments and thanked all those who had been involved in the production of the Plan, and he also agreed that it was important that as many local residents as possible, were involved in the process.

The Place Shaping Manager advised that the next consultation would be a more formal stage of the Plan, and comments would be sought on its contents, not on new ideas to shape the Plan. In response to queries regarding the content of the Plan, he agreed that some areas were ambitious and although officers were supportive of those ambitions, officers felt that some clarity was needed around some of the Plan's aspirations.

It unanimously

RESOLVED

To agree that

1. The submitted Long Stratton Neighbourhood Plan meets the requirements of Part 6 of Schedule 4B of the Town and Country Planning Act 1990.
2. The Neighbourhood Plan can proceed to consultation, in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012, and subsequently to an independent examination.
3. The proposed South Norfolk Council response, as detailed in Appendix 2, is formally submitted as part of the Regulation 16 consultation.

The Reason for the Decision

The Plan has met the assessment criteria and should therefore progress through to the next stage of consultation and independent examination.

Other Options Considered

None

2878 PROPOSED CHANGE TO DISCRETIONARY RATE RELIEF POLICY

Members considered the report of the Revenues Manager, which sought approval of a change to the Discretionary Rate Relief Policy with regard to top-up relief for registered charities.

The Revenues Manager briefly outlined his report to members, explaining that the threshold for this element of the Policy had not been amended for ten years. Members noted that the proposed change would currently offer additional support to five charities in the District, at a cost of £1000 per year.

Members expressed their support for the proposal, and it was unanimously

RESOLVED

That the Discretionary Rate Relief policy is amended to increase the discretionary top-up relief cap from £4,000 to £5,000 per registered charity (with the exception of those for properties listed as being outside the scope of the policy).

The Reason for the Decision

To provide higher levels of top-up relief to all eligible charities, which do not currently benefit from full relief.

Other Options Considered

None

2879 COVID-19 HARDSHIP FUND POLICY 2021/22

Members considered the report of the Housing and Benefits Manager and the Housing and Wellbeing Senior Manager, which presented members with the Covid-19 Hardship Fund Policy for approval.

The Housing and Wellbeing Senior Manager explained that the purpose of the fund was to help mitigate the impact of Covid-19 on the local economy, through the provision of short-term financial support to residents that were really struggling financially.

Commending the report to members, the Portfolio Holder, Cllr Y Bendle, expressed her support for the Policy, explaining that this was a short term measure, to be reviewed later in the year.

It was unanimously

RESOLVED

To approve the adoption of the Covid-19 Hardship Fund Policy for the year 2021/22.

The Reason for the Decision

To ensure that the Council continues to provide short term financial support to those residents when suffering severe financial hardship.

Other Options Considered

None

2880 AFFORDABLE HOME OWNERSHIP - QUALIFICATION

The Housing Enabling Officer presented his report, which proposed that residents of the three Greater Norwich authority areas (Broadland, Norwich and South Norfolk) should have equal priority for affordable home ownership properties in the three areas, in circumstances where a local connection priority was applied.

The Portfolio Holder, Cllr Y Bendle, commended the report to Cabinet, and members welcomed the proposals.

It was unanimously

RESOLVED

That unless otherwise agreed by the Director of Place in consultation with the Portfolio Holder:

- 1 For affordable home ownership (shared equity and Discounted Market Sale) provided through negotiation with developers and in circumstances where a local connection is applied, priority will be given for residents of Broadland, Norwich and South Norfolk.
- 2 The reciprocal agreement with Broadland, Norwich and South Norfolk will be entered into for a trial period of 2 years.

Other Options Considered

None.

2881 SOCIAL PRESCRIBING

Members considered the report of the Senior Communities Manager, which sought agreement from Cabinet to sign off the agreement between the Council and South Norfolk Healthcare CIC (GP provider organisation) for the running of the Social Prescribing Service.

The Senior Communities Manager presented her report, explaining that the Social Prescribing Service was run through a collaboration between the Council and the Primary Care Network. The aim of social prescribing was to divert patients away from clinical services, accessing more appropriate support from other agencies or within the Community where possible.

Members noted that one of the aspirations of the service was for it to continue to be funded externally and officers would continue to work with the NHS and other interested parties to secure this.

Members agreed that the Community Connectors provided a very valuable service, however queried how the Council would be able to provide tangible evidence that the service was an asset and was succeeding in diverting patients away from clinical services. It was felt that the report had failed to provide this information, which would be very important in order to secure future funding.

The Portfolio Holder, Cllr Y Bendle, expressed her support for the recommendations of the report and advised that South Norfolk Council had begun work on social prescribing, before the real benefits of the service had been recognised by the NHS. She challenged officers to produce a further report for future consideration, providing more detail and tangible evidence on the success of the service. It was suggested that it would be appropriate for this report to be considered by the People and Communities Committee.

The Senior Communities Manager explained that she anticipated the service to continue to grow and advised that the value of the service was recognised nationally within the NHS. She stressed that officers would ensure that the Council had the best evidence base possible to demonstrate success. In response to queries, she advised that one of the aims of the service was to build community resilience. Members noted that mental health remained a huge priority and that a District Direct Officer was now employed at the Hellesdon Hospital, a mental health facility in Norwich.

During further discussion, the Chairman stressed the need to find a tangible evidence base going forward. The Managing Director agreed that it was important to demonstrate the value for money delivered by the scheme and that the Council remained at the forefront of such partnership working.

It was unanimously

RESOLVED:

To delegate to the Director of People and Communities, in consultation with the portfolio holder for Better Lives, to sign off the contract for social prescribing services.

The Reason for the Decision

To continue to support the aim to have strong local connections and to identify and support those residents who need help.

Other Options Considered

None

2882 RESPONSE TO NEW HOMES BONUS CONSULTATION

Members considered the report of the Director of Resources, which sought an agreed response to the Government's "The Future of the New Homes Bonus Consultation".

The Director of Resources referred Cabinet to the draft response circulated the previous Friday by email, which detailed the Council's draft response. She briefly outlined the questions in the consultation paper, and the proposed responses.

The Chairman stressed the need to emphasise the materiality point, and the significance of the New Homes Bonus income to the Council, explaining that the proposals could impact the Council to the sum of £3 million. Members agreed that this should not only be laid out in monetary terms, and that the impact on other Council services should be highlighted, for example the impact on communities should the Help Hub have to cease operating. The Chairman suggested that this needed to be highlighted alongside the very small positive impact this level of resource could have on social care.

Members also suggested that the narrative be strengthened regarding the importance of incentives to build the economy and stressed that it was not a good time to be destabilising the incentive to build homes.

In response to a query regarding the opportunity for members to review a final draft of the document, the Managing Director suggested that this could be circulated to members before it was submitted in April.

It was unanimously

RESOLVED

To delegate to the Director Resources and Director Place in consultation with the Portfolio Holders for Finance and Resources and Stronger Economy, the authority to approve the Council's final response to the New Homes Bonus Consultation.

The Reason for the Decision

To ensure a robust response to the consultation.

Other Options Considered

None

2883 CABINET CORE AGENDA

Members noted the latest version of the Cabinet Core Agenda.

It was agreed that a report regarding in person meetings should be considered at the next meeting of the Cabinet on 19 April. The Chairman suggested that he, the Managing Director and the Assistant Director Governance and Business Support, along with the Leader of the Opposition and the Chairmen of Committees, worked collectively on the paper.

The Assistant Director Governance and Business Support advised members that reports on the IT Systems and the Accommodation Review were currently being drafted, and that these would be programmed in for consideration, when timescales were more certain.

The Managing Director asked members to note that 19 April was the last date to register to vote at the May elections, and that Tuesday 20 April was the last date to apply for a postal vote.

(The meeting concluded at 10.54 am)

Chairman

Poringland Neighbourhood Plan – Final Decision Statement

Report Author(s): Richard Squires
Senior Community Planning Officer
(01603) 430637
richard.squires@broadland.gov.uk

Portfolio: External Affairs and Policy; Stronger Economy

Ward(s) Affected: Poringland, Framinghams & Trowse

Purpose of the Report:

South Norfolk Council is required to make a decision, following a further period of consultation in relation to Policy 2 of the Poringland Neighbourhood Plan, on whether the Plan should proceed to a referendum. This report summarises the results of the consultation and sets out a proposal for members.

Recommendations:

1. To amend Policy 2 of the proposed Poringland Neighbourhood Plan in accordance with the Council's proposed minor amendment to the second examiner's recommended modifications.
2. To publish the final Decision Statement (Appendix 2), setting out the Council's decision in respect of each examiner's recommendations and ultimately approving that the Neighbourhood Plan should proceed to a referendum in the neighbourhood area.

1. Summary

- 1.1 At the meeting on 8th February 2021, Cabinet agreed to undertake a further period of consultation in relation to Policy 2 (Housing – Scale) of the Poringland Neighbourhood Plan. This was due to the Council proposing a further minor amendment to the second examiner's proposed modifications to the policy.
- 1.2 This consultation with previous Neighbourhood Plan consultees took place over a six week period between 15th February and 29th March. Six responses have been received and these are set out in Appendix 1. Given the nature of the responses, as well as the desire not to further delay a decision on the Neighbourhood Plan, it is not proposed to seek a further independent examination in relation to Policy 2.
- 1.3 The Council is now required to make a decision as regards the wording of Policy 2 and whether the Neighbourhood Plan should proceed to a referendum within the neighbourhood area.
- 1.4 Each of the original examiner's remaining recommendations (i.e. excluding those relating to Policy 2) were approved by Cabinet at the meeting on 15th June 2020.

2. Background

- 2.1 The original examination of the Poringland Neighbourhood Plan was undertaken by an independent planning consultant, Ms. Deborah McCann, and her final report (received by the Council in January 2020) included several recommendations for modifying the Neighbourhood Plan policies before the document could proceed to a referendum.
- 2.2 Cabinet considered each of the recommendations made by Ms. McCann at their meeting on 15th June 2020 and made a decision to take a different view to the examiner in relation to Policy 2 (proposing alternative modifications); to accept each of the examiner's other recommended modifications; and to delegate the decision on whether to appoint an examiner, following the consultation on the proposed modifications to Policy 2, to the Director of Place.
- 2.3 Following the consultation period, which took place between 29th June and 10th August, eight representations were received from various bodies. Due to the nature of the proposed modification and the representations received, the decision was taken by the Director of Place to appoint a second independent examiner to consider the Council's suggested alternative modification to Policy 2, as well as the representations received.
- 2.4 Ms. Ann Skippers (Ann Skippers Planning) was appointed and undertook the examination between 28th September and 4th November. This examination culminated in a report being issued to Council officers detailing the examiner's recommendations. These recommendations included amendments to the Council's proposed alternative modified wording to Policy 2.

- 2.5 However, in order to ensure that Policy 2 has the clarity required by paragraph 16(d) of the NPPF (thus meeting the basic conditions for Neighbourhood Plans), the Council proposed a further minor amendment to the second examiner's recommended modification of Policy 2. This was agreed at Cabinet on 8th February 2021.
- 2.6 Legal advice received recommended that the Council undertake a further six week period of consultation on this proposed decision, notifying the same consultees as before. This consultation period took place between 15th February and 29th March.

3. Current position/findings

- 3.1 A total of six representations were received during the recent consultation. These were from:
- Anglian Water
 - Water Management Alliance
 - Historic England
 - Environment Agency
 - Natural England
 - Gladman Developments Ltd.
- 3.2 A summary of the responses is set out in Appendix 1. The only response which sets out an objection to the proposal is from Gladman Developments Ltd.
- 3.3 Gladman's objection to the proposal is on the basis that the changes proposed are 'not in accordance with the basic conditions of neighbourhood planning, as they have no regard to the approach taken to the adopted Joint Core Strategy and are not in general conformity with the strategic policies contained in the development plan for the area'. Gladman also states that 'the proposal does not have regard to national policy and guidance as it will stifle the delivery of sustainable development opportunities in the neighbourhood plan area'.
- 3.4 The officer response to these points, as set out in Appendix 1, is that Poringland has exceed its minimum housing allocations, as set out in the Joint Core Strategy, and that the sites allocated within the Council's Site Allocations and Policies Document have been, or are in the process of being developed.
- 3.5 In addition, whilst not yet adopted and still subject to objections, the proposed Greater Norwich Local Plan (GNLP) does not propose further growth within the parish as part of its planning strategy up until 2038. If this requirement changes then this can be addressed through the examination and adoption of the GNLP, as explicitly referenced within the amended supporting text to the policy.
- 3.6 The revised policy itself does not seek to completely restrict new development. Its effect is to seek to limit individual proposals to sites no larger than 1 hectare, except in specific circumstances.

- 3.7 On this basis, officers do not consider that the Council's proposed approach to the amendment of Policy 2 would undermine the achievement of sustainable development.
- 3.8 Given the nature of the consultation responses, officers have not deemed it necessary to appoint a further examiner to consider this issue. A third examination would also further delay a decision being made in respect of the Neighbourhood Plan.
- 3.9 Officers have not sought legal guidance on this particular representation, but the nature of the officer response reflects previous legal advice on the wider issue of the Council taking a different view to examiners in relation to Policy 2.

4. Proposed action

- 4.1 Given the basis of the discussion above, officers propose that the Council's minor amendment to the second examiner's recommended modification to Policy 2 is approved.
- 4.2 This will mean that the Council has made a decision in relation to each of the examiners' recommendations with regards to the Neighbourhood Plan, as each of the original examiner's remaining recommendations were agreed by Cabinet at the meeting of 15th June 2020.
- 4.3 A proposed Final Decision Statement is set out in Appendix 2, setting out the Council's response to each recommendation and ultimately approving that the Neighbourhood Plan should proceed to a referendum within the neighbourhood area. There is a legal requirement for this Decision Statement to be published as soon as possible following the Council's final decision.
- 4.4 If the Neighbourhood Plan proceeds to a local referendum and is supported by majority of those who vote, the Plan will become part of the Development Plan for South Norfolk and will subsequently be 'made' (adopted) by South Norfolk Council.

5. Other options

- 5.1 Advice previously received from NP Law sets out the realistic, alternative options that are available to the Council. These were highlighted in the Cabinet Report of 8th February 202, but to re-iterate, they are:
 - a) To approve the policy wording as originally modified by South Norfolk Council (i.e. as submitted to the second examiner);
 - b) To approve the amended policy wording as recommended by the second examiner.

- 5.2 As discussed in the earlier Cabinet Report, except for the one element of the modification which requires further clarity, officers are minded that the second examiner's recommendations are reasonable and help ensure that the policy meets the basic conditions for neighbourhood planning. It is not recommended to refuse the examiner's findings in their entirety and revert to the District Council's alternative modification (i.e. point [a], above).

6. Issues and risks

- 6.1 **Resource Implications** – Officers will be required to publish the Decision Statement online and send a copy to the Parish Council and previous consultees.
- 6.2 The preparation for and holding of the local referendum will demand a significant amount of officer time, particularly from within the Electoral Services team and, to a lesser extent, the Place Shaping team. This will be met from the existing staff resource.
- 6.3 The Council is required to pay for the referendum and this will be met from within the existing budget. The average cost of a Neighbourhood Plan referendum is £4,500. It is worth noting that, to date, the Council has been able to claim £20,000 from MHCLG for each Neighbourhood Plan that has been approved to proceed to a referendum. Although funding has not yet been confirmed for 2021/22, there is no indication that this is due to finish.
- 6.4 Should any legal challenge be submitted (see section below), the Council would be liable for any associated legal costs.
- 6.5 **Legal Implications** – The procedures highlighted within this report follow legislation set out in the Neighbourhood Planning (General) Regulations 2012 (as amended) and Schedule 4B of the Town & Country Planning Act 1990.
- 6.6 It was identified in the Cabinet Report of 8th February that the consultation on the further minor amendment to Policy 2 might give sufficient warning of any potential, future legal challenges from any parties. This is not explicitly apparent in any of the responses received, despite there being one objection. Despite this, a challenge could still be made to the Plan once the Council finally 'makes' (adopts) the document. As the Council is the responsible authority for 'making' the Plan it is the Council that would be the defendant in any subsequent legal challenge.
- 6.7 **Equality Implications** – An Equalities Impact Assessment has been completed on the submitted Neighbourhood Plan.
- 6.8 **Environmental Impact** – A Habitats Regulation Assessment Screening has been undertaken for the Plan and agreed with the relevant bodies, and the environmental implications of the Poringland Neighbourhood Plan have been assessed through a Sustainability Appraisal.

6.9 **Crime and Disorder** – The Plan is not likely to have any impacts on crime and disorder (the comments of Norfolk Constabulary on this issue have been incorporated into the Plan) nor is it likely to have any impacts on disadvantaged groups.

6.10 **Risks** – No other particular risks associated with the Neighbourhood Plan are identified.

7. Conclusion

7.1 Following the recent consultation with Neighbourhood Plan consultees, and given the nature of the responses received and the discussion in paragraphs 3.3 - 3.7, it is proposed that Cabinet approves the Council's minor amendment to the second examiner's modifications to Policy 2 of the Poringland Neighbourhood Plan.

7.2 This will then allow the Council to publish its final Decision Statement (as set out in Appendix 2) in relation to both examiners' recommendations, allowing the Neighbourhood Plan to proceed to a referendum.

8. Recommendations

8.1 Cabinet to agree to:

1. Amend Policy 2 of the proposed Poringland Neighbourhood Plan in accordance with the Council's proposed minor amendment to the second examiner's recommended modifications.
2. Publish the final Decision Statement (Appendix 2), setting out the Council's decision in respect of each examiner's recommendations and ultimately approving that the Neighbourhood Plan should proceed to a referendum in the neighbourhood area.

Appendix 1: Consultation responses - proposed decision to make a further amendment (Policy 2: Housing – scale)

Appendix 2: Poringland Neighbourhood Plan – Final Decision Statement

Background papers

[Poringland Neighbourhood Plan – Submission Version](#)

[Original Examiner's Report \(Jan 2020\)](#)

[Examiner's Report into Policy 2 Housing – scale \(Nov 2020\)](#)

Poringland Neighbourhood Plan - consultation responses on proposed decision to make a further amendment (Policy 2: Housing - scale)

Ref	Organisation	Summary of comments	Officer response
PNP2.1	Anglian Water	<p>The following comments are submitted on behalf of Anglian Water and should be read together with our original response to the plan and the earlier consultation relating to Policy 2 (Housing).</p> <p>We note that the Council has suggested a modification to Policy 2 (Housing) in relation to the definition of identified housing need which differs from that proposed by the Examiner. The proposed wording does not appear to raise any issues for Anglian Water as an infrastructure provider.</p>	Comments noted
PNP2.2	Water Management Alliance	The Parish of Poringland is located outside any of the WMA Member Boards Internal Drainage Districts and their Wider Watershed Catchments, therefore we have no comments to make.	Comments noted
PNP2.3	Historic England	Historic England have considered the consultation and note that the modification is to a policy dealing with the scale of development sites, and does not relate to the historic environment. We do not consider the proposed modification is likely to change the potential of the Neighbourhood Plan and its effect on the historic environment, and we therefore do not wish to make any further comments. Thank you for consulting us.	Comments noted
PNP2.4	Environment Agency	We can confirm that we have no comments to make on the below consultation.	Comments noted
PNP2.5	Natural England	Natural England does not have any specific comments on this further information regarding Poringland Neighbourhood Plan amendment (Policy 2: Housing – Scale).	Comments noted
PNP2.6	Gladman Developments Ltd.	<p>The following is a summary. Please see full representation - 20212903 Gladman response [pdf].</p> <p>Gladman consider that the changes proposed by the Council following the second examination of the PNP are not in accordance with the basic conditions as they have no regard to the approach taken to the adopted JCS and are not in general conformity with the strategic policies contained in the development plan for the area nor do they have regard to national policy and guidance as it will stifle the delivery of sustainable development opportunities in the neighbourhood plan area.</p> <p>For clarity and for the avoidance of doubt Gladman resubmit our suggested Policy 2 set out below:</p> <p>“Housing schemes of a scale proportionate to Poringland (100 to 200 dwellings) and its role within the settlement hierarchy as a Key Service Centre and proximity to Norwich, will be supported where in accordance with other policies of the development plan.</p>	<p>Comments noted.</p> <p>The adopted strategy for growth, including the amount of homes required in different locations to 2026, is set out within the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk. Within the JCS, Poringland was identified as a key service centre in which land would be allocated for small-scale housing growth within the range of 100-200 dwellings and, if necessary, additional land to help to delivery the "smaller sites in the NPA" allowance. Additional development plan documents adopted by South Norfolk Council allocated specific land to meet the requirements of the JCS. In particular, South Norfolk Council's Site Specific Allocations and Policies Document (2015) sets out the specific allocations in Poringland to deliver its contribution to planned growth.</p> <p>In actuality Poringland has exceeded its minimum housing allocation range, as set out within the JCS, and the sites allocated within the Site Specific Allocations and Policies Document have now been, or are in the process of being, developed.</p> <p>Despite there being outstanding objections, and it still being subject to a forthcoming examination by the Planning Inspectorate, the Greater Norwich Local Plan (GNLP) has now reached an advanced stage and does not propose further growth within the parish, in order to meet requirements to 2038. If an independant inspector disagrees with the Council's position, or otherwise the requirement for growth changes, then this can be effectively addressed through the examination and adoption of the GNLP. This is explained within the amended supporting text to the policy. In any event, the policy does not seek to restrict all future development, rather it seeks to limit the size of any individual development site to no more than 1 hectare. The Council would note that the NPPF specifically seeks to support small and medium sized housebuilders in meeting housing requirements, an objective acheived in part by seeking to ensure a good mix of development sites, including sites of less than 1 hectare.</p> <p>Therefore, the Council does not consider that its proposed approach to the amendment of Policy 2 would undermine the achievement of sustainable development.</p>

South Norfolk Council

Poringland Neighbourhood Plan - Final Decision Statement (19/04/2021)

1. Summary

This Decision Statement sets out the response of South Norfolk Council to each of the examiners' recommendations in respect of the submitted Poringland Neighbourhood Plan and declares that, subject to the specified modifications below, the Neighbourhood Plan will proceed to a referendum within the neighbourhood area.

2. Background

Following the submission of the Poringland Neighbourhood Plan to South Norfolk Council in June 2019, the Plan was published in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 and representations invited. The publication period took place in July and August 2019.

The local planning authority, with the approval of Poringland Parish Council, subsequently appointed an independent examiner, Deborah McCann, to conduct an examination of the submitted Neighbourhood Plan and conclude whether it meets the Basic Conditions (as defined by Schedule 4B of the Town and Country Planning Act 1990) and consequently whether the Plan should proceed to referendum.

The examiner's report concluded that, subject to making certain recommended modifications, the Neighbourhood Plan meets the Basic Conditions and should proceed to a Neighbourhood Planning referendum.

At its Cabinet meeting of 15th June, South Norfolk Council proposed to accept each of the examiner's recommendations, apart from that relating to Policy 2 'Housing – scale', for which it proposed an alternative modification.

A consultation took place on the Council's alternative modification to Policy 2 between 29th June and 10th August 2020. Eight representations were received from various bodies during this consultation and South Norfolk Council subsequently decided to appoint a second examiner, Ann Skippers, to consider the proposed alternative modification as well as the representations received.

The report of the re-examination of Policy 2 was presented to South Norfolk Council on 4th November. The recommendation of Ms. Skippers was that, with specified amendments to the Council's alternative modifications, Policy 2 will meet the basic conditions and other legal requirements of neighbourhood planning. Consequently, her report recommends that the Neighbourhood Plan should proceed to a referendum in accordance with the recommendations made by Ms. McCann, subject to her recommended modification for Policy 2 being replaced by the alternative modification proposed by South Norfolk Council, as subsequently amended by Ms. Skippers.

The Council subsequently decided to propose a further minor amendment to Ms. Skippers' recommended modified wording, for reasons of clarity, and this was subject to a further consultation between 15th February and 29th March.

3. Decision

Following the aforementioned consultation period, the Council has decided to make its proposed amendment to Ms. Skippers' recommended modification to Policy 2. This will ensure that the policy achieves greater clarity and therefore meets the Basic Conditions. This is in accordance with sections 12 and 13 of Schedule 4B to the Town and Country Planning Act 1990.

As stated above, the Council has approved all of the remaining recommended modifications of the original examiner, Ms. McCann.

The following table sets out each of the two examiners' recommended modifications, the Council's consideration of those recommendations, and the Council's final decision in relation to each recommendation. With the exception of the entry for Policy 2, which includes details of the recommendations by both examiners, the table deals with the recommendations of Deborah McCann, the first examiner.

Subject to the modifications approved by South Norfolk Council, as set out in the table below, the Council is satisfied that the Neighbourhood Plan should proceed to a referendum within the neighbourhood area, in accordance with part 12(4) of Schedule 4B of the Town & Country Planning Act 1990.

Section	Examiner's recommendation	Council consideration of recommendation	Council decision
Policy 1: Phasing residential growth	<p>'For clarity and to meet the Basic Conditions, Policy 1 should be modified as follows:</p> <p><i>Policy 1: Sustainable residential growth</i></p> <p><i>In order to ensure sustainable growth in the village, any future housing growth which generates additional need for local services and infrastructure should be phased to ensure alignment with the capacity of available local services and infrastructure.'</i></p>	The Council agrees with the examiner's rationale that the original policy wording was unclear and was worded as a statement rather than as a policy.	Accept examiner's recommended modification.
Policy 2: Housing – scale	<p>1st Examiner: Deborah McCann</p> <p>'For clarity and in order to meet the Basic Conditions the policy should be modified as follows:</p> <p><i>Proposals for small scale development including in-fill within the development boundary will be supported in principle where the proposal does not unduly harm the local character in terms of landscape and adjacent buildings, important views.'</i></p>	The Council does not consider that the recommended modification provides the necessary clarity to meet the Basic Conditions.	<p>Reject the recommended modification to the policy by the first examiner.</p> <p>The Council proposed alternative modifications to the policy wording in order to address issues of clarity and to ensure the policy meets the Basic Conditions (See appendix 1 for details).</p>
	<p>2nd Examiner: Ann Skippers</p> <p>'The alternative modification then cites two circumstances where sites of a larger size will be supported. (...) In principle, I consider including an exception or exceptions to the site size threshold is useful to increase flexibility and to ensure that housing growth can continue to be delivered alongside infrastructure. However, the two circumstances outlined are not acceptable in their current format; they are too ambiguous and will not necessarily contribute to the achievement of sustainable development.' (p.15 and p.16)</p> <p>'There is a further modification to make to this part of the policy. It refers to the larger 'exception' sites needing to accord with draft Plan Policy 14 which covers character and design. The first examiner proposed some changes to the draft policy which have been accepted and both versions would apply to all development. Therefore there is no need for larger sites to comply with draft Policy 14; it applies to all development.'</p>	<p>The Council agrees with the examiner that the exception relating to the delivery of supporting community facilities and infrastructure should be amended in the way described.</p> <p>The Council agrees that the reference to Policy 14 is not strictly required and can be deleted.</p> <p>However, the Council feels that a further minor amendment is required to the policy exception relating to 'an identified housing need'. In the Council's view, this phrase is too ambiguous and this element of the</p>	Make a minor amendment to the second examiner's recommended modified wording to Policy 2 and supporting text. (See appendix 2 for details).

	<p>The examiner recommends that the Council's alternative modifications to the policy are themselves modified to read as follows:</p> <p><u>Modification 1</u></p> <p>'Change the policy to read as follows:</p> <p><i>"Individual proposals for housing development within the parish should be located on sites no larger than one hectare.</i></p> <p><i>Development on sites larger than one hectare will only be supported where:</i></p> <ol style="list-style-type: none"> <i>1. they would meet an identified housing need and</i> <i>2. they would provide and deliver the supporting community facilities and infrastructure needed.</i> <p><i>The artificial subdivision of larger sites in an attempt to circumvent the above requirements will not be acceptable.</i></p> <p><i>Where multiple residential developments are likely to occur, consideration will need to be given to the cumulative impact of development and any infrastructure necessary to mitigate it. Development will not be permitted unless any unacceptable cumulative impacts can be appropriately addressed through the use of conditions or planning obligations.</i></p> <p><i>Small in-fill proposals inside the development boundary will be supported in principle, provided that the proposal:</i></p> <ol style="list-style-type: none"> <i>1. does not unduly harm the local character in terms of landscape, adjacent buildings or important views, and;</i> <i>2. would be located on a site comprising a gap within an otherwise continuous line of housing or other development."</i> <p><u>Modification 2</u></p> <p>'Change the supporting text as follows:</p> <p><i>"Future development proposals should be small scale i.e. should not exceed one hectare per development site. As stated in the policy, larger sites will be supported where the 1 hectare cap would hamper</i></p>	<p>policy needs further clarification.</p> <p>This, in turn, will require further, minor amendments to the supporting text, to reflect the changes in the policy.</p>	
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	<p><i>the ability of a development to meet identified housing needs (such as sheltered housing or housing with care schemes) and provide and deliver the supporting community facilities and infrastructure needed.</i></p> <p><i>As stated in Section 5 'Monitoring & Implementation', it will be necessary to monitor and review the Plan (and particularly Policy 2) in light of future Local Plan reviews for the district. As stated in the National Planning Policy Framework, the policies in a made neighbourhood plan take precedence over existing non-strategic policies in a local plan (where they are in conflict), unless they are then superseded by strategic or non-strategic policies that are subsequently adopted in a Local Plan. Whilst regard will be had to the Neighbourhood Plan policies in any local plan review, it remains possible for the local planning authority to promote larger allocations of land for residential development if it considers there are good reasons to do so in order to ensure the need for homes is appropriately met across the local plan area.</i></p> <p><i>Where there is an identified need for infrastructure, the policy includes a safeguard against the subdivision of larger sites and requires the specific consideration of cumulative impacts in order to avoid the delivery of such a responsibility. The artificial subdivision of sites which have a functional link and/or are in the same ownership to circumvent the requirements of the policy will not be acceptable."</i></p>		
Policy 3: Housing Mix	<p><i>'For clarity and to meet the Basic Conditions the policy should be modified as follows:</i></p> <p><i>Policy 3: Housing Mix</i></p> <p><i>Where viable, housing proposals will need to provide a mix of housing types, tenures and sizes, and these should reflect local need using the best available, proportionate evidence. It is recognised that the mix is likely to be limited to small developments of fewer than five dwellings.</i></p> <p><i>The inclusion of accessible and adaptable dwellings to serve the needs of older and disabled residents is strongly supported. Where there is identified need, developments of five or more dwellings should aim to provide a minimum of 20% of dwellings of this type. This applies to open-market and affordable housing combined and can include homes designed to Lifetime Homes Standard or single storey units. Proposals for accommodation specifically for older or</i></p>	The Council agrees with the examiner's rationale that there is no strategic level assessment or higher level policy which provides detailed evidence of need within Poringland, and that the original policy should therefore be modified.	Accept examiner's recommended modification.

	<p><i>disabled people, such as sheltered housing or Housing with Care, will be supported in principle.</i></p> <p><i>Lifetime Homes Standard will be encouraged for all new dwellings to enable people to stay in the parish as they move through the stages of life, and proposals meeting this standard will be supported.</i></p> <p><i>Any proposal that does not provide a mix meeting local need will need to be justified with clear evidence that such homes are not at that time required to that level.</i></p> <p><i>The inclusion in a housing proposal of eco-homes to Passivhaus or equivalent standards and self-build plots on development sites will also be encouraged.'</i></p>		
Policy 4: Housing – location	<p>'For clarity and to meet the Basic Conditions the policy should be amended as follows:</p> <p><i>Development proposals within the adopted development boundary or on allocated sites should, where possible minimise the increase of traffic through the village centre, as shown on Map 4, Village Centre and Valued Landscape map, page 57.</i></p> <p><i>To help with this, development will be expected to be located and designed to make it easy and attractive for new residents to walk or cycle to local services and facilities and use the bus for longer journeys.</i></p> <p><i>In accordance with South Norfolk Council's landscape character assessment for Poringland which resists changes that will further accentuate the linear nature of development in the village, proposals for major development that result in the growth of the village further southward will not generally be acceptable.</i></p> <p><i>Proposals for minor development south of the village will need to demonstrate how additional traffic generated will be managed so that the impact on the village centre or residential areas is minimised and there is no undue harm to the valued landscape and its characteristics, and key important views.'</i></p>	<p>The Council agrees with examiner's rationale that the policy, as originally worded, would be difficult to apply in the determination of a planning application.</p> <p>This is due to a lack of clarity, a lack of definition for 'material increase', and that the NPPF already addresses significant impacts on the transport network.</p>	Accept examiner's recommended modification to the policy wording, and the inclusion of a map showing the adopted development boundary, as it affects the Neighbourhood Area.'
Policy 5: Affordable housing	'For clarity and to meet the Basic Conditions the policy should remove the bullet point reference to 20 dwellings or fewer.	The Council agrees with the modification to remove reference to	Accept examiner's recommended modifications.

	<p>South Norfolk Council have made representation that as an additional priority relating to military personnel has been inserted since the Regulation 14 consultation the wording in the supporting text on page 22 requires amending to reflect housing this as follows: <i>However, South Norfolk Council will need to determine priorities between applicants, so that applicants who have served in the Armed Forces are given greater priority than those without a local connection that have not served</i>’.</p> <p>I concur with this requirement.’</p>	<p>‘20 dwellings or fewer’. This is required due to the proposed modifications to Policy 2 (see above).</p> <p>The Council also agrees to amendments to the supporting text.</p>	
Policy 6: Natural Environment	<p>‘In order to meet the Basic Conditions, the policy should be modified as follows:</p> <p><i>Policy 6: Natural Environment</i></p> <p><i>All development will be expected to achieve a demonstrable net ecological gain to meet statutory requirements including through the creation of a range of locally appropriate habitats and the inclusion of design features, including those that enable animals, especially species in decline, to move between habitats unhindered. Support will be given to proposals that would result in a significant net ecological gain, or which help to support the B-Line for pollinators or other key green infrastructure as set out in The Greater Norwich Green Infrastructure Strategy.</i>’</p>	<p>The Council agrees with examiner’s rationale that there is not sufficient evidence to support the original policy requirement of a 10% net biodiversity gain.</p>	Accept examiner’s recommended modification.
Policy 7: Trees and hedgerows	<p>‘For clarity the first paragraph of Policy 7 should be modified as follows:</p> <p><i>Proposals should include high quality landscaping design that retains, where possible existing trees and hedgerows.</i>’</p>	<p>The Council agrees with examiner’s reasoning that the first paragraph needs to be amended to allow potential access to development sites.</p>	Accept examiner’s recommended modification.
Policy 8: Landscape	<p>‘For consistency, clarity and to meet the Basic Conditions, Policies Map 4 should be re annotated to refer to important landscape and the policy should be modified as follows:</p> <p><i>Policy 8: Landscape</i></p> <p><i>In accordance with South Norfolk Council’s landscape character assessment for Poringland which resists changes that will further accentuate the linear nature of development in the village, proposals for major development that result in the growth of the village further</i></p>	<p>The Council agrees with the examiner’s statement that there is not sufficiently robust evidence to support the designation of a Valued Landscape and the serious policy restrictions this would impose.</p>	Accept examiner’s recommendation to re-annotate Map 4 to refer to ‘Important Landscape’, and to modify the policy wording.

	<p><i>southward will not generally be acceptable.</i></p> <p><i>The landscape to the south of the village (as identified on Policies Map 4, p57) is valued by the community and important to the setting of the village. Proposals for development within this important landscape will not be supported unless specifically supported by other policies in the Development Plan.'</i></p>		
Policy 9: Long views	<p>'I have received the following representation from South Norfolk Council:</p> <p><i>"The Council recommends Policy Map 2 (page 55) and Policy Map 4 (page 57) are updated to illustrate the important views being referred to in Policy 9 (and shown in the photographs at page 58) and to illustrate the Chet Valley Linear Reserve and the parkland around Porch Farm which are referenced within the supporting text for Policy 9. It is also recommended that the broad locations from which longer distance views towards Norwich and the Tas Valley, referenced in Policy 9, should be illustrated on Map 2."</i></p> <p>I concur with these recommendations.'</p>	The Council supports the representation it submitted during the Regulation 16 publication stage, as referred to by the examiner.	Accept examiner's recommended modification.
Policy 10: Recreational open space provision	'I have no comment on this policy.'	The Council notes the examiner's endorsement.	No modification necessary.
Policy 11: Local Green Space designations	'I have no comment on this policy.'	The Council notes the examiner's endorsement.	No modification necessary.
Policy 12: Street lighting	<p>'For clarity and to meet the Basic Conditions, the policy should be modified as follows:</p> <p><i>Policy 12: Street Lighting</i></p> <p><i>In order to maintain the "dark skies" and rural feel in Poringland the introduction of street lighting as part of new development should be avoided. Where new street lighting cannot be avoided it must be designed so as to minimise the adverse impact on dark skies, local amenity, landscape and wildlife.'</i></p>	The Council agrees with the examiner's reasoning that there may be situations where the installation of street lighting will be required for highway or pedestrian safety. These decisions are outside the control of the Neighbourhood Plan.	Accept examiner's recommended modification.

Policy 13: Flood risk	<p>'For clarity and to meet the Basic Conditions the policy should be modified as follows:</p> <p><i>Policy 13: Flood risk</i></p> <p><i>All major development proposals, or all development proposals coming forward within the areas of high, medium and low risk from surface water flooding, as identified by the Environment Agency, should have due regard to the South Norfolk Council Poringland Integrated Urban Drainage Strategy Supplementary Groundwater Drainage Report (2008) and where required by national policy include a Flood Risk Assessment (FRA) and Surface Water Drainage Strategy that gives adequate and appropriate consideration to all sources of flooding and surface water drainage to ensure there is no increased risk of flooding either on the development site or to existing property as a result of the development. Developers will be expected to demonstrate that there will be no increase in flood risk elsewhere.</i></p> <p><i>Sustainable Drainage Systems will need to be considered for all planning applications, following the SuDS hierarchy, but in particular note:</i></p> <ul style="list-style-type: none"> <i>i. Development that manages surface water through infiltration methods may be supported but only if it can be clearly demonstrated to be effective by appropriate percolation and soil investigation tests showing that this will not result in the increase of flood-risk on-site or off- site. There should be no direct discharge to groundwater and schemes should provide a saturated zone of 1.2 metres.</i> <i>ii. Where infiltration is not effective or practicable, as will be the case in much of Poringland, developers should seek solutions that use storage zones or connections to a water course. Such drainage solutions should intercept and store long term surface water run-off by means of attenuation and controlled discharge with an appropriate allowance for climate change.</i> <p><i>Any drainage strategy should avoid the piping of existing drainage channels unless this is shown to be necessary. The incorporation of rainwater re-use or rainwater harvesting systems to further delay and reduce flows will be supported. As a minimum, water butts should be considered in all new development. The Neighbourhood Plan will particularly support water features that are incorporated into recreational areas or ecological gains as part</i></p>	The Council agrees with the examiner's rationale that the original policy wording did not have sufficient regard for national policy and, in part, lacked clarity.	Accept examiner's recommended modification.
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	<p><i>of the solution, where appropriate.</i></p> <p>In addition, South Norfolk Council have made representation that the supporting text for policy 13 (page 32) requires modification:</p> <p><i>“The significance of the issue is set out in the South Norfolk Council Poringland Integrated Urban Drainage Strategy Supplementary Groundwater Drainage Report (2008), hereafter referred to as ‘The Millard Report’.</i></p> <p><i>The problem is caused by natural springs and streams, and the predominant boulder clay geology overlain by 8-12m of sand and gravel. Many of the problems stem from the predominant boulder clay geology overlain in some areas by sands and gravels. Where the sands and gravels interface with the boulder clay close to the surface, this can give rise to transient springs and natural flow routes.”</i></p> <p>I concur with this modification.’</p>		
Policy 14: Character and design	<p>‘For clarity the policy should be modified as follows:</p> <p><i>Policy 14: Character and Design</i></p> <p><i>All new development within Poringland should demonstrate high-quality design. Proposals for new development should:</i></p> <p><i>a) be locally distinctive, in keeping with the context of a rural village of similar diversity, density, footprint, separation and scale to the surrounding area and of neighbouring properties in particular, unless it can be demonstrated that proposed development would not harm local character as set out in the Poringland Character Assessment document;</i></p> <p><i>b) be designed so as to provide distinct character across housing proposals, which is either contemporary (but reflects traditional housing styles), or makes use of traditional materials which reflects older properties within the village;</i></p> <p><i>c) include attractive and robust landscape proposals and planting schemes of appropriate native species.</i></p> <p><i>d) be well integrated into the landscape and maintain the quality of transition between settled and agricultural landscape;</i></p>	The Council agrees with the examiner’s reasoning that the original policy is slightly repetitive, with elements that require further clarity.	Accept examiner’s recommended modification.

	<p><i>e) retain wherever possible existing landscape features on site boundaries including hedges and trees to maintain the character of the site and reinforce its boundaries;</i></p> <p><i>f) not adversely impact views to and from the sensitive edge of the plateau; particularly in the north of the area, identified at Policy 9;</i></p> <p><i>g) ensure that the external appearance of affordable dwellings is indistinguishable in terms of the materials used and architectural detail from the open market housing on site;</i></p> <p><i>h) ensure that public spaces in major residential development are designed to provide an attractive and interesting community focus;</i></p> <p><i>i) ensure that there is connectivity between existing and new footpath and/or cycle paths and between open spaces to aid integration of existing and new development.</i></p> <p><i>j) provide adequate garden areas which reflect the nature of the occupation of the proposed dwellings, to serve future residents and reflect the current character of the area;</i></p> <p><i>k) provide a defined area for bins as close to the property's rear doors as possible; and</i></p> <p><i>l) be designed to prioritise pedestrian movement, minimising vehicle intrusion.</i></p> <p><i>Planning permission will not be granted for development of poor design that fails to take the opportunities available for improving local character and quality of an area, and the way it functions.</i></p> <p><i>Development proposals shall be in keeping with the South Norfolk 'Place-Making Guide', 'Building for Life' criteria and 'Secure by Design'.</i></p>		
Policy 15: Historic environment	<p>'For clarity and to meet the Basic Conditions the policy should be modified as follows:</p> <p><i>Policy 15: Historic Environment</i></p> <p><i>Proposals affecting Designated and Non-Designated Heritage Assets</i></p>	The Council agrees with the examiner's statement that elements of the original policy repeated national policy and guidelines.	Accept examiner's recommended modification.

	<i>must comply with national policy and the Development Plan. Support will be given to proposals that will conserve and enhance heritage assets, especially those in the south or south-east of the village.'</i>		
Policy 16: Sustainable transport	<p>'For clarity the second paragraph of policy 16 should be modified as follows:</p> <p><i>Development proposals should, where relevant demonstrate safe walking and cycling links to key local services and community facilities, especially to schools and the defined village centre.</i></p>	The Council agrees with the examiner's observation that the provision of safe walking and cycling links will not be relevant for all developments.	Accept examiner's recommended modification.
Policy 17: School parking	'I have no comment on this policy.'	The Council notes the examiner's endorsement.	No modification necessary.
Policy 18: Transport layout of new residential development	<p>'For clarity and to meet the Basic Conditions the policy should be modified as follows:</p> <p><i>Policy 18: Transport layout of new residential development</i></p> <p><i>The roads serving new residential developments should be designed to minimise traffic speeds, limited to 20mph or lower wherever possible.</i></p> <p><i>Layouts should be permeable, allowing for safe pedestrian and cyclist access and should follow Secured by Design guidance. In particular, footways that enjoy natural surveillance, are overlooked by a number of dwellings, and are not routed along the backs of homes and/or bounded by high fences, will be considered favourably.'</i></p>	The Council agrees with the examiner's observation that guidance on the design and layout of roads for residential development is set out in the Manual for Streets at a national level by the local highway authority.	Accept examiner's recommended modification.
Policy 19: Residential parking standards	<p>'The final paragraph of this policy does not provide any flexibility and should be modified as follows:</p> <p><i>Rear parking courts will only be supported in exceptional circumstances.'</i></p>	The Council agrees with the examiner's reasoning regarding flexibility.	Accept examiner's recommended modification.
Policy 20: Local Community Facilities and Services	'I have no comment on this policy.'	The Council notes the examiner's endorsement.	No modification necessary.
Policy 21: Development in the village centre	'I have no comment on this policy.'	The Council notes the examiner's endorsement.	No modification necessary.

Policy 22: Economic development	'For clarity the final paragraph of this policy should be deleted.'	The Council agrees with the examiner's observation that the final paragraph of this policy is potentially confusing and could lead to a perceived support for economic development proposals outside the development boundary.	Accept examiner's recommended modification.
Policy 23: Telecommunications	'I have no comment on this policy.'	The Council notes the examiner's endorsement.	No modification necessary.
Policy 24: Physical and Social Infrastructure	'This is not a land use policy and should be deleted from this section of the Plan. The CIL priority list can either be included in the body of the Plan or the as part of the community aspiration/project section of the Plan.'	The Council agrees with the examiner's reasoning that this is not a land use policy.	Accept examiner's recommended modification.

4. Next Steps

South Norfolk Council is satisfied that with the modifications it has approved, as detailed above, the Poringland Neighbourhood Plan should proceed to a referendum within the neighbourhood area (i.e. the civil parish), in which the following question will be posed:

‘Do you want South Norfolk Council to use the Neighbourhood Plan for Poringland to help it decide planning applications in the neighbourhood area?’

Further information relating to the referendum will be published by South Norfolk Council in due course.

APPENDIX 1: Council consideration of original examiner's recommendation – Policy 2 'Housing – scale'

Basic Conditions and the National Planning Policy Framework

- 1.1 The Council proposes to make modifications which differ from that recommended by the examiner. It is considered that these modifications are required in order to secure that the draft Neighbourhood Plan meets the basic conditions of neighbourhood planning, as enabled by section 12(6)(a) of Schedule 4B of the Town and Country Planning Act 1990.
- 1.2 In particular, the Council considers that the examiner's recommended modifications to Policy 2 of the Poringland Neighbourhood Plan would mean that the Plan does not have regard to national policies and advice contained in guidance issued by the Secretary of State, as required by Section 8(2)(a) of the aforementioned Act.

Scale of development outside of a defined development boundary

- 1.3 Paragraph 16(d) of the National Planning Policy Framework (NPPF) states that 'plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.'
- 1.4 The examiner's recommendations results in a policy that relates to "small scale development *including infill within the development boundary ...*" (emphasis added). In doing so the policy seems to relate to all types of small scale development whether inside or outside a development boundary. Where development occurs inside a development boundary this is likely to create some inherent policy limitations to the scale of such proposals. No such limitations would exist on sites outside of a defined development boundary.
- 1.5 On the basis of the above, the Council considers that the examiner's recommended modifications would create a policy which is unclear and ambiguous, particularly in its lack of definition of what '*small scale development*' outside of defined development boundaries. This would create uncertainty about what is acceptable, in development terms, in such circumstances.
- 1.6 The Council feels that the policy should be clearer on what scale of development would be considered acceptable outside of defined settlement boundaries. The examiner notes South Norfolk Council's concern (raised during the Regulation 16 consultation) with the original policy wording, stating that 'the 20-dwelling threshold has not been sufficiently justified by evidence'. However, the Regulation 16 representation from South Norfolk Council states that these concerns were raised during the earlier Regulation 14 consultation and that the proposed wording was subsequently amended following discussion. At this time, criteria for supporting schemes larger than 20 dwellings were introduced. South Norfolk Council's representation at the Regulation 16 stage was actually focused on the need to avoid artificial subdivision of sites and the need to clarify the requirements for infill development.

- 1.7 Nevertheless, South Norfolk Council considers that a more effective standard for 'small scale' (for a community the size of Poringland) could be through an area-based approach, rather than setting a cap on numbers of dwellings.
- 1.8 Setting a cap (albeit with exceptions – see below) of 1 hectare per site allows for greater flexibility than a cap on number of dwellings. A site of 1 hectare allows flexibility in terms of density of development, albeit in keeping with the design and character requirements of Policy 14 of the Neighbourhood Plan. For a settlement such as Poringland, it is felt that a site of 1 hectare could deliver 25-30 homes and be in keeping with the general character. In addition, the 1 hectare standard is used to define smaller, entry-level exception sites within the NPPF (Paragraph 71, footnote 33) as well as in the definition of 'small and medium sized sites' to promote a 'good mix of sites' in paragraph 68. It is also of a scale (0.5-1ha) consistent with smaller sites being identified through the emerging Greater Norwich Local Plan (Policy 7.4, Draft Greater Norwich Local Plan, February 2020).

Exceptions

- 1.9 In addition, the examiner has removed the element of Policy 2 which deals with exceptions to the scale cap. These exceptions were introduced into the policy wording by the Qualifying Body following comments made by South Norfolk Council during the Regulation 14 'Pre-submission' consultation. The Council's concern was that setting a limit of twenty dwellings on all proposals could not be considered sustainable and that therefore certain exceptions to this requirement should be defined. These exceptions recognise that, in certain instances, larger scale proposals may well provide community benefits/infrastructure enhancements or may be required to address specific demographic needs (such as the delivery of supported housing for the elderly).
- 1.10 In their report, the examiner did not criticise the exceptions to Policy 2, but neither did they make any provision for them within their recommended modifications. This is an important element to the policy that South Norfolk Council feels needs to be retained. It is considered that the omission of these exceptions would result in a policy that does not contribute to sustainable development, as required by paragraph 16(a) of the NPPF. It would not, for example, identify the need for exceptions which might be considered material in order to ensure that suitable infrastructure can be delivered. Nor would the resulting policy be considered one that has been 'prepared positively', as required by paragraph 16(b) of the NPPF. It is therefore proposed to introduce exceptions into the policy wording that address this issue.

Sub-division of sites

- 1.11 It follows that by setting a cap on the size of development sites and then allowing for exceptions to that requirement in cases where it is necessary for important infrastructure to be delivered, a safeguard against the subdivision of larger sites in order to avoid such a responsibility will also be necessary.
- 1.12 This also reflects the representation made by South Norfolk Council during the Regulation 16 consultation, whereby similar concerns were raised. These concerns were reflected within the examiner's report and the assumption is therefore that the examiner accepts the Council's concerns as to sites potentially being developed without the necessary infrastructure to address cumulative impacts. The Council therefore proposes to modify the policy in order to incorporate this element.

Infill development

- 1.13 Again, in recommending their modification to Policy 2, the examiner has not adequately reflected concerns regarding the character of infill development and, specifically, the focus on infill sites comprising a genuine 'gap' within an otherwise continuous line of housing. There was, seemingly, no objection to this element within the examiner's report, and yet it has been removed in the recommended modifications.
- 1.14 This form of development is particularly and inherently prone to raise issues of prejudicial impact to the form and character of the settlement, if not properly managed. Again, South Norfolk Council considers that the issue of infill proposals, particularly the issue of gaps between development, should be reflected within the policy wording to ensure that it contributes to sustainable development in accordance with the NPPF.

Proposal by South Norfolk Council

- 1.15 As a result of the concerns with the examiner's recommended modifications to Policy 2 of the Neighbourhood Plan, as discussed above, South Norfolk Council has proposed modifications to the policy and to the associated supporting text. These are set out below.

Council proposal – Policy 2 ‘Housing – scale’

Refuse examiner’s recommended modification.

Propose alternative modifications to the policy wording, as set out below, in order to address issues of clarity and to ensure the policy meets the Basic Conditions.

‘Individual proposals for housing development within the parish should be located on sites no larger than one hectare.

Developments on sites larger than one hectare will only be supported where they are in accordance with Policy 14 (Character and Design) of the Neighbourhood Plan, and:

1. Where they also propose to deliver overriding community benefits, such as improved priority infrastructure*.

Or

2. Where the one hectare cap will adversely affect the viability of development meeting specific identified demographic needs.

The artificial subdivision of larger sites in an attempt to circumvent the above requirements will not be acceptable.

Where multiple residential developments are likely to occur, consideration will need to be given to the cumulative impact of development and any infrastructure necessary to mitigate it. Development will not be permitted unless any unacceptable cumulative impacts can be appropriately addressed through the use of conditions or planning obligations.

Small in-fill proposals inside the development boundary will be supported in principle, provided that the proposal:

1. does not unduly harm the local character in terms of landscape, adjacent buildings or important views, and;
2. would be located on a site comprising a gap within an otherwise continuous line of housing or other development.

**Priority infrastructure needs are set out in Community Aspiration Statement 2.’*

The following text is intended to replace **paragraphs 10 and 11 of section 1.2** of the supporting text within the Neighbourhood Plan:

‘Future development proposals should be small scale i.e. should not exceed one hectare per development site. This size limit applies to sites considered under Policy 2. As stated in the policy, larger sites will be supported where the 1 hectare cap adversely affects the viability of development meeting specific demographic needs (such as sheltered housing or housing with care schemes) or providing important infrastructure for the community.

As stated in Section 5 ‘Monitoring & Implementation’, it will be a necessity to monitor and review the Plan (and particularly Policy 2) in light of future Local Plan reviews for the district. As stated in the National Planning Policy Framework, the policies in a made neighbourhood plan take precedence over existing non-strategic policies in a local plan (where they are in conflict), unless they are then superseded by strategic or non-strategic policies that are subsequently adopted in a Local Plan. Whilst regard will be had to the Neighbourhood Plan policies in any local plan review, it remains possible for the local planning authority to promote larger allocations of land for residential development if it considers there are good reasons to do so in order to ensure the need for homes is appropriately met across the local plan area.

Where there is an identified need for infrastructure, the policy includes a safeguard against the subdivision of larger sites and requires the specific consideration of cumulative impacts in order to avoid the delivery of such a responsibility.’

APPENDIX 2: Council consideration of second examiner's recommendation – Policy 2 'Housing – scale'

- 1.16 South Norfolk Council proposes to make a minor amendment to the modified Policy 2 wording that was recommended by the second examiner, Ms Ann Skippers. It is considered that this amendment is required in order to secure that the draft Neighbourhood Plan meets the basic conditions of neighbourhood planning, as set out in section 12(6)(a) of Schedule 4B of the Town and Country Planning Act 1990.
- 1.17 The examiner recommends modifications to change the wording of the two 'exceptions' within the policy that deal with circumstances in which larger housing sites would be supported by the Neighbourhood Plan. The amendment that the Council is proposing relates to the 'exception' that deals with 'an identified housing need' (examiner's recommended wording).
- 1.18 In relation to this specific clause, the Council's proposed alternative modification to the submitted version of Policy 2 stated that developments on sites larger than one hectare will only be supported 'where the one hectare cap will adversely affect the viability of development meeting specific identified demographic needs'.
- 1.19 The second examiner recommends that this statement be amended to read '...will only be supported where they would meet an identified housing need'.
- 1.20 In her reasoning for the modification, the examiner states that both this and the exception relating to the delivery of community facilities and infrastructure are too ambiguous and will not necessarily contribute to the achievement of sustainable development. It is also noted that the modifications will 'ensure the policy is flexible and will allow larger schemes, more likely perhaps to impact infrastructure, and to provide infrastructure, as well as providing for identified housing needs, to occur.'
- 1.21 South Norfolk Council takes the view that the phrase, '...would meet an identified housing need' is too ambiguous to provide the clarity required by paragraph 16(d) of the NPPF, and to ensure that it will be evident to a decision maker when the exception to the size threshold should be applied. This concerns is also exacerbated by inconsistency between the examiner's proposed modified policy wording and the modified supporting text.
- 1.22 In particular, the examiner has retained the examples provided of 'identified housing needs' within the supporting text (i.e. 'such as sheltered housing or housing with care schemes'). Although these are provided as examples and the recommended policy wording would not exclude other kinds of housing needs, there is an inherent acknowledgement that the intention of the policy is to provide for housing that meets the specific needs of different demographic sectors of the community. The Council feels that this intention is not captured in the examiner's recommended modifications and that the further amendment is therefore necessary.
- 1.23 As a result of the above, South Norfolk Council has proposed a further minor amendment to the policy wording. This is set out below.

Proposed South Norfolk Council amendment to second examiner's recommended modifications

The following sets out the wording recommended by the second examiner in relation to Policy 2 – Housing Scale, as well as the minor amendment currently being proposed by South Norfolk Council (new text in red; deletions shown using strikethrough).

Policy 2: Housing - Scale

Individual proposals for housing development within the parish should be located on sites no larger than one hectare.

Development on sites larger than one hectare will only be supported where:

1. they would meet an identified housing need **for specialist housing, such as sheltered housing, supported housing and extra care housing, or other types of housing provided to sectors of the community whose needs are not met by open market housing, and**
2. they would provide and deliver the supporting community facilities and infrastructure needed.

The artificial subdivision of larger sites in an attempt to circumvent the above requirements will not be acceptable.

Where multiple residential developments are likely to occur, consideration will need to be given to the cumulative impact of development and any infrastructure necessary to mitigate it. Development will not be permitted unless any unacceptable cumulative impacts can be appropriately addressed through the use of conditions or planning obligations.

Small in-fill proposals inside the development boundary will be supported in principle, provided that the proposal:

1. does not unduly harm the local character in terms of landscape, adjacent buildings or important views, and;
2. would be located on a site comprising a gap within an otherwise continuous line of housing or other development.

Supporting Text

Future development proposals should be small scale i.e. should not exceed one hectare per development site. As stated in the policy, larger sites will **only** be supported where ~~the 1 hectare cap would hamper the ability of~~ a development ~~to~~**would**-meet **an** identified housing needs (such as sheltered housing or housing with care schemes) and provide and deliver the supporting community facilities and infrastructure needed.

As stated in Section 5 'Monitoring & Implementation', it will be necessary to monitor and review the Plan (and particularly Policy 2) in light of future Local Plan reviews for the district. As stated in the National Planning Policy Framework, the policies in a made neighbourhood plan take precedence over existing non-strategic policies in a local plan (where they are in conflict), unless they are then superseded by strategic or non-strategic policies that are subsequently adopted in a Local Plan. Whilst regard will be had to the Neighbourhood Plan policies in any local plan review, it remains possible for the local planning authority to promote larger allocations of land for residential development if it considers there are good reasons to do so in order to ensure the need for homes is appropriately met across the local plan area.

Where there is an identified need for infrastructure, the policy includes a safeguard against the subdivision of larger sites and requires the specific consideration of cumulative impacts in order to avoid the delivery of such a responsibility. The artificial subdivision of sites which have a functional link and/or are in the same ownership to circumvent the requirements of the policy will not be acceptable.

Endorsement of the Norfolk Strategic Planning Framework Update

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Portfolio: External Affairs and Policy
Stronger Economy

Ward(s) Affected: All

Purpose of the Report:

This report seeks members' agreement to endorse the update to the Norfolk Strategic Planning Framework.

Recommendations:

1. It is recommended that Cabinet recommends to Council that it endorses the update to the Norfolk Strategic Planning Framework and agrees to remain a signatory to the document.

1. Summary

- 1.1 The Council in its role as the local planning authority has a legal responsibility to engage constructively and on an ongoing basis with other public bodies on strategic cross boundary matters. The Norfolk Strategic Planning Framework (NSPF) provides a structure for tackling those cross boundary matters. In doing so it demonstrates how the authority is working with others to fulfil its obligations. The NSPF has now been revised to ensure it remains up-to-date and effective (updated version attached as Appendix A).

2. Background

- 2.1 Local planning authorities, county councils and public bodies have a legal responsibility to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan and marine plan preparation in the context of strategic cross boundary matters. This responsibility is referred to as the Duty to Cooperate. The National Planning Policy Framework (NPPF) also requires strategic policy making authorities to maintain one or more statement of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.
- 2.2 The NSPF provides a structure for tackling these cross boundary planning issues across the county, especially those which have a strategic impact across local authority boundaries. It includes guidance relating to housing, economic growth, infrastructure and the environment. The NSPF informs the Local Plans produced by all the authorities.
- 2.3 The NSPF is prepared by officers from the constituent authorities, under the oversight of the Norfolk Strategic Planning Member Forum, which comprising representatives from all the authorities. The Council's representative is the Portfolio Holder for External Affairs and Policy, who is also the chairman of the forum.
- 2.4 In 2018 the Council became a signatory to the first version of the NSPF. The Council endorsed an update to an update of the NSPF in 2019. Since the last update, work has continued to update the document and ensure that it fulfils its functions in helping the Council demonstrate the Duty to Cooperate and that it meets the requirements of the NPPF.

3. Current position/findings

- 3.1 The endorsed NSPF includes 31 'Formal Agreements'. These Agreements include working towards a shared Spatial Vision (Agreement 2) and Shared Objectives (Agreement 3). The Vision and Objectives have regard to the main spatial planning issues of population growth, housing, economy, infrastructure and environment. Agreements on specific issues 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.

3.2 A number of changes are now proposed in order to ensure the NSPF remains up to date. The updated version of the NPPF is included at appendix A. The changes to the document include updated factual references to new legislation and information, with all data and links having been updated to the latest available. Other notable changes to the document are bullet pointed below:

- a) small changes to the vision and objectives in relation to the local industrial strategy, Covid 19 Economic Recovery Restart Plan, opportunity for the region presented by a clean/green recovery, reducing unnecessary car usage and supporting new technologies (Section 2.3)
- b) References to the Planning White Paper and other proposed changes to the planning system (Various)
- c) Reorganisation of the Economic section with more information on priority sectors, the impact of Covid 19 and references to the New Anglia LEP Covid 19 Economic Recovery Restart Plan (Section 5)
- d) Changes to the Elderly People section with references to the latest demographic projections and the emerging Older Person Accommodation and Support Needs Study (Section 6.4)
- e) A new section on Health (Section 7)
- f) A new section on Climate Change (Section 8)
- g) A new section and agreement has been added to enable the Marine Management Organisation (MMO) to become a signatory to the document (Section 9.8).
- h) Significant changes to the telecoms section, taking account of progress with the 5G rollout (Section 9.5).
- i) Changes to the Flood Management and Green Infrastructure section, including references to the National Flood and Coastal Erosion Risk Management Strategy and explanation of the work being carried out to understand and mitigate in-combination recreational impacts on protected Habitat Sites (Section 9.9)
- j) an update of conclusion and next steps to highlight the commitment from all authorities to continue joint working – at least for the next financial year (Section 10).

3.3 Changes also include some additional or amended agreements. Again these are bullet pointed below:

- a) A new agreement in the economic section to say that Local Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan (Agreement 8).
- b) A change to the Health agreement to make reference to healthy environments in design guides/codes and reference to Building for Healthy Life (Agreement 18).
- c) A new agreement on climate change, highlighting the Local Planning Authorities in Norfolk agree that climate change is an urgent, strategic cross boundary issue which will be addressed through local plans. The agreement also states that Local Authorities will give consideration to the approaches in the Climate Change and the planning system document produced by an officer sub-group contributing to the NSPF when the relevant policies are next being reviewed and updated as part of the Local Plan process (Agreement 19).

- d) Related to the climate change agreement above, a new agreement is included highlighting that a number of climate change initiatives are best addressed via a Norfolk wide design guide and Local Planning Authorities will work together to investigate the production of one with climate change best practice guidance included. This work will also help facilitate healthy living initiatives across the county by providing high level principles (Agreement 20).
- e) A new agreement to support the ongoing work with Water Resources East (Agreement 21).
- f) A new agreement to support the high speed broadband provision in emerging Local Plans – Norfolk Local Planning Authorities will consider the extent to which they could require high-speed broadband to be delivered as part of new developments and promoting Fibre to the Premises (FTTP) to smaller sites through the inclusion of a new policy (Agreement 24).
- g) A change to the telecoms agreement highlighting the shared guidance produced with Mobile UK, this highlights that authorities will continue to engage with the telecommunications industry on their 5G rollout plans for Norfolk (Agreement 25).
- h) The agreement in the Green Infrastructure section to reflect the need for Norfolk Authorities to complete the Green Infrastructure and Recreational Avoidance and Mitigation Strategy to protect habitat sites (Agreement 28).

3.4 An updated draft of the NSPF was considered by the Member Forum on the 26th January 2021. The Member Forum agreed:

“to recommend that once any amendments required from feedback received on the current version of the document have been made, each constituent authority agrees to take the revised NSPF back to their authority for formal endorsement.

and

to delegate any final working changes to officers to agree including any changes to allow the MMO to become a signatory”

3.5 In accordance with the recommendation of the member forum officers worked with the MMO and final wording changes have now been agreed. Changes to the NSPF considered by the Member Forum following discussions with the MMO include minor wording changes to the agreements to ensure there was consistency in who they apply to, new wording in section 3 to better define the process for marine plans and additional strategic cross boundary issue areas within agreement 27.

3.6 The member forum also requested further work to be completed around the GI RAMS study so the NSPF has been updated to highlight that this work is still on-going. All further changes made since the Member Forum are bullet pointed below:

- a) Minor inconsistencies around the used of ‘Norfolk Authorities’ and ‘the Authorities’ etc. have been updated in the agreements to ensure it is clear who the agreement relates to.

- b) In section 1.4 wording has been included to highlight that the signatories undertake their statutory duties in accordance with relevant legislation, policy and guidance; and in the context of other relevant Statements of Common Ground, Memoranda of Understanding and Position Statements which they are party to.
 - c) Updated wording in section 3 to highlight the process followed for marine plans and their application
 - d) An addition to the environmental objective of 'Leaving the environment in a better state for future generations.'
 - e) Reference to the UK Government and offshore wind industry agreed Sector Deal
 - f) Reference to the government's December 2020 announcement of a new plan which aims for at least a 68% reduction in greenhouse gas emissions by the end of the decade
 - g) Reference to the East Anglia Coastal Group's role in producing Shoreline Management Plans.
 - h) In Agreement 27 additional areas were added as strategic cross boundary issues
 - i) Changes in the GI section to highlight the on-going work of the GI RAMS study
 - j) Minor change to the Minerals and Waste section noting that marine minerals do not contribute significantly to Norfolk's mineral provision and that Norfolk County Council does not determine planning applications for marine aggregates and they do not form part of the Minerals and Waste Local Plan.
- 3.7 Further supporting documentation to the NSPF has also been produced, and are provided as an appendix to this report. These comprise:
- Climate Change and the Planning System (Appendix B)
 - Norfolk 5G Shared Guidance (Appendix C)
- 3.8 At the time of writing the Older Person Accommodation and Support Needs Study and Norfolk Green Infrastructure and Recreational Avoidance and Mitigation (GIRAMS) has not been finalised.

4. Proposed action

- 4.1 It is proposed that the Council endorses the updated NSPF and remains one of the signatories to the Framework. The Framework is an iterative document that will evolve and be updated to reflect changing circumstances, subject to any wider changes to the planning system. Also, it is likely that there will continue to be opportunities for joint-working amongst the local planning authorities on issues under the Framework. Potential work identified for the next iteration of the NSPF include:
- Investigating the production of a Norfolk Design Guide / Charter
 - Development an implementation programme for a county wide RAMS tariff
 - Review of the Norfolk HELAA Methodology
 - Review of the Health Protocol
 - Review of new evidence requirements to support the production of future local plans

5. Other options

- 5.1 The Council could decide not to be a signatory to the NSPF and/or not to continue to review and evolve the document to address emerging issues; however, the Government is clear, through the NPPF, that Statements of Common Ground which address strategic, cross-boundary planning issues will be key to assessing the soundness of Local Plans. Councils will also have to continue to demonstrate that they are meeting their 'Duty to Cooperate' obligations. Notwithstanding these requirements, the member and officer groups that support the development of the NSPF also provide a useful and practical way of focussing attention on key, cross-boundary issues.

6. Issues and risks

- 6.1 **Resource Implications** – There is an ongoing financial implication for the Council in terms of supporting the work of members and officers in keeping the NSPF up to date. A direct financial contribution is also made to cover the costs of the NSPF Programme Manager and the ongoing studies needed to evidence the NSPF. Officer time is within existing staff resources and the NSPF reflects work that would, in any event, need to be undertaken as part of the Local Plan process, in terms of Duty to Cooperate and Statement of Common Ground. Significant financial savings have been and can be made through the joint commissioning of evidence base work. The budget is available for this work and if it were not undertaken through the NSPF, resource would need to be found to prepare elements of the Local Plan evidence base and fulfil the requirements of the Duty to Cooperate and Statement of Common Ground.
- 6.2 **Legal Implications**– the NSPF 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 and in demonstrating that they are meeting the requirements to produce Statements of Common Ground under the NPPF.
- 6.3 **Equality Implications** – It is not considered that the Framework will have any adverse impacts in terms of equalities. Individual Local Plans prepared taking account of the NSPF will be subject to EQIA assessment, taking account of their specific policy implications.
- 6.4 **Environmental Impact** – As a non-statutory document which is not making new policy, there are no negative environmental implications. The NSPF indicates how the Norfolk local authorities aim to work together to manage some environmental matters (such as recreational pressures on sensitive nature conservation sites) more effectively.
- 6.5 **Crime and Disorder** – It is not considered that the Framework will have any adverse impacts in terms of crime and disorder

7. Conclusion

- 7.1 The revised NSPF (Appendix A) will assist the Council in fulfilling its obligations to demonstrate the Duty to Cooperate (under the Localism Act 2011) and meet the National Planning Policy Framework (NPPF) requirement to have a Statement of Common Ground, which will be key in showing that Local Plan documents are 'sound' during their Examination by the Planning Inspectorate.

8. Recommendations

- 8.1 It is recommended that Cabinet recommends to Council that it endorses the update to the Norfolk Strategic Planning Framework and agrees to remain a signatory to the document.

Background papers

None

Norfolk Strategic Planning Framework

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

January 2021



Signatories

- Breckland District Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Natural England
- Environment Agency
- Anglian Water
- Marine Management Organisation
- New Anglia Local Enterprise Partnership
- Active Norfolk
- Water Resources East

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- South Norfolk Council
- Norfolk County Council
- Suffolk County Council
- Babergh & Mid Suffolk District Councils
- East Suffolk Council
- West Suffolk Council
- Fenland District Council
- East Cambridgeshire District Council
- South Holland District Council
- Natural England
- Environment Agency
- Wild Anglia
- Anglian Water
- New Anglia Local Enterprise Partnership
- UK Power Networks
- Cambridgeshire and Peterborough Combined Authority
- Norfolk and Waveney CCG
- NHS Sustainability and Transformation Partnership Estates for Norfolk and Waveney
- Mobile UK

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Summary of Formal Agreements within the Statement of Common Ground

Please Note: 'Norfolk Planning authorities' and 'Norfolk Authorities' refers to the 7 district authorities that make up Norfolk (see section 1.4), the Broads Authority and Norfolk County Council.

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.

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

Agreement 3 - By 2036, through co-operation between the Norfolk 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*
- To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change*
- To address housing needs in Norfolk*
- To improve the quality of life and health for all the population of Norfolk*
- To improve and conserve Norfolk's rich and biodiverse environment*

*Full details of each objective are in section 2 of this document

Agreement 4 –To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

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

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.

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.

Agreement 8 – Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan

Agreement 9 - The list of locations in section 5 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.

Agreement 10 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). 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.

Agreement 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.

Agreement 13 – 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.

Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

Agreement 15 - 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.

Agreement 16 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

Agreement 17 - 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.**

Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.

Agreement 19 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to give consideration to the approaches in the NSPF Climate Change research Paper of this report when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Agreement 20 - Norfolk Planning Authorities agree to work together to investigate the production of a county wide climate change best practice guide/design guide and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles.

Agreement 21– Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning 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.

Agreement 23 – 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. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high-speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 26: Norfolk 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.

Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues:

- Infrastructure
- Governance
- Heritage
- Marine Protected areas
- Marine and coastal employment
- Sustainable port development
- Energy – offshore wind and oil and gas
- Access for tourism and recreation
- Sustainable and aquaculture fisheries in small harbour towns
- AONB and Seascape and landscape (character and natural beauty)
- Biodiversity
- Marine aggregates
- Cabling
- Water quality/water supply and sewerage
- Climate change/ Coastal erosion and coastal change management

Agreement 28: 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

Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

Agreement 29 :

It is agreed that:

- 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand.**
- 2) A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand.**
- 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development.**
- 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy.**
- 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period.**
- 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns. Priority for the location of new waste management facilities will be given to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.**
- 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.**

Agreement 30: In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

Agreement 31: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.

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 the Norfolk Strategic Planning Framework (NSPF).

The aim of producing the framework was 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 revised National Planning Policy Framework;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high level plans (such as the New Anglia LEP's Economic Strategy, Local Industrial Strategy¹ and Covid 19 Economic Recovery Restart Plan²); and
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

The previous version of the NSPF was endorsed by all Norfolk planning authorities in October 2019 it considered the impact of the revised National Planning Policy Framework (NPPF)³ and the requirement to apply a new standardised methodology to assessing housing need, and produce statements of common ground. It is clear that Norfolk's local planning authorities needed to continue to work closely together to address strategic planning matters and therefore the Norfolk Strategic Planning Member forum agreed to continue to formally cooperate on strategic planning activities and to update the NSPF.

This document continues to fulfil the requirement for Norfolk Local Planning Authorities to produce a statement of common ground setting out the effective and on-going joint working across the county on strategic planning matters. It addresses key cross-boundary issues and progress in cooperating to address these.

A number of working groups have been tasked with updating the document. These groups consist of Local Authority staff assisted by other organisations including the Environment Agency, Natural England NHS Sustainability and Transformation Partnership (STP), Anglian Water, UK Power Networks, Active Norfolk 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.

¹ New Anglia LEP Local Industrial Strategy - <https://newanglia.co.uk/local-industrial-strategy/>

² See New Anglia LEP Covid 19 Economic Recovery Restart Plan - <https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf>

³ See National Planning Policy Framework - <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

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

[Norfolk Strategic Planning Member Forum - www.norfolk.gov.uk/nsf](http://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. The absence 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 Governance Arrangements for the creation of this document

Norfolk Strategic Planning Member Forum

The development of this Framework is overseen by the Norfolk Strategic Planning Member Forum. This consists of one Member from each of the Borough Council of King's Lynn and West Norfolk, Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, South Norfolk Council and the Norfolk County Council. 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. The operation of the Member Forum and officer support group is governed by formal terms of reference available from [the Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf](http://www.norfolk.gov.uk/nsf). Chairmanship is determined by the Forum and reviewed each year. The meetings of the Forum are held every three months and held in public. An agenda and papers are circulated in advance of each meeting and informal action notes will be taken and published on the Norfolk Strategic Planning Framework website. Each authority endorses this document through their relevant committees or cabinets.

Norfolk Strategic Planning Officers Group

The Norfolk Strategic Planning Officers Group consists of key planning policy officers from each Planning Authority in Norfolk as well as other key statutory agencies. The group reviews the progress of the document production on a monthly basis. The group have ensured that the document progresses to the timetable and meets any government and legislative requirements.

The Steering Groups

The steering group is responsible for the creation of the document, receiving reports from the Technical Sub groups to help in the authoring process.

Technical Sub groups

The Technical Sub Groups provide technical evidence and make recommendations in relation to the document to the Steering Group. They consist of officers from the Authorities involved in the production of the document and a range of bodies who have expertise and interest in matters related to the group's subject.

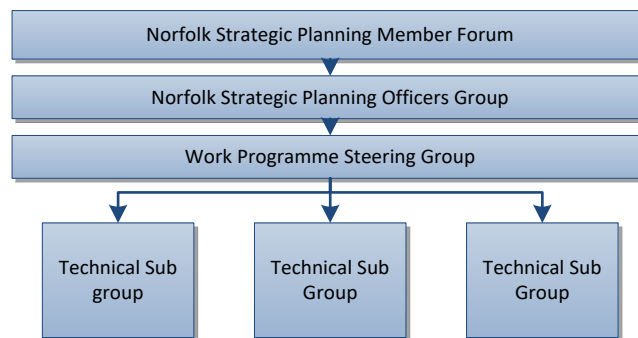


Figure 1: Governance arrangements for the Norfolk Strategic Planning Framework

1.3 Changes to the document

In updating this document Norfolk's local planning authorities sought to ensure the NSPF is up to date with all relevant information and legislation. The document has been updated after the completion of a number of county wide studies looking at:

- Green infrastructure and Recreational avoidance and mitigation and the introduction of a county wide tariff to mitigate against the impact on existing Natura 2000 sites
- The housing needs of the elderly and the types of accommodation required
- Actions that local planning authorities can take to help mitigate and adapt to climate change
- A new health section to highlight the importance of health provision and health living as a strategic cross boundary issue
- Shared Guidance on the roll out of 5G and to help improve fibre broadband connectivity
- Updates to remaining sections to take account of new or updated information

Whilst this document was being prepared the government announced a consultation on landmark reforms to the planning system under the Planning for the Future White Paper⁴. The key aims of the changes are to speed up and modernise the planning system and get the country building. One of the proposed changes will be to abolish the Duty to Cooperate. However the government is giving further consideration to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared. Once further clarification is provided by central government through new legislation and a revised National Planning Policy Framework it will become clear if Norfolk Planning Authorities can continue to address strategic planning matters through a revision of this document. In the meantime partner authorities remain committed to cooperative processes and updating this document.

⁴ See [Planning for the Future White Paper - https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system](https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system)

1.4 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.

This Statement of Common Ground has been prepared with the understanding that the signatories undertake their statutory duties in accordance with relevant legislation, policy and guidance; and in the context of other relevant Statements of Common Ground, Memoranda of Understanding and Position Statements which they are party to.

All Norfolk Local Planning Authorities have agreed to plan to at least 2036 in their next generation of local plans. 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 907,760⁵. 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.

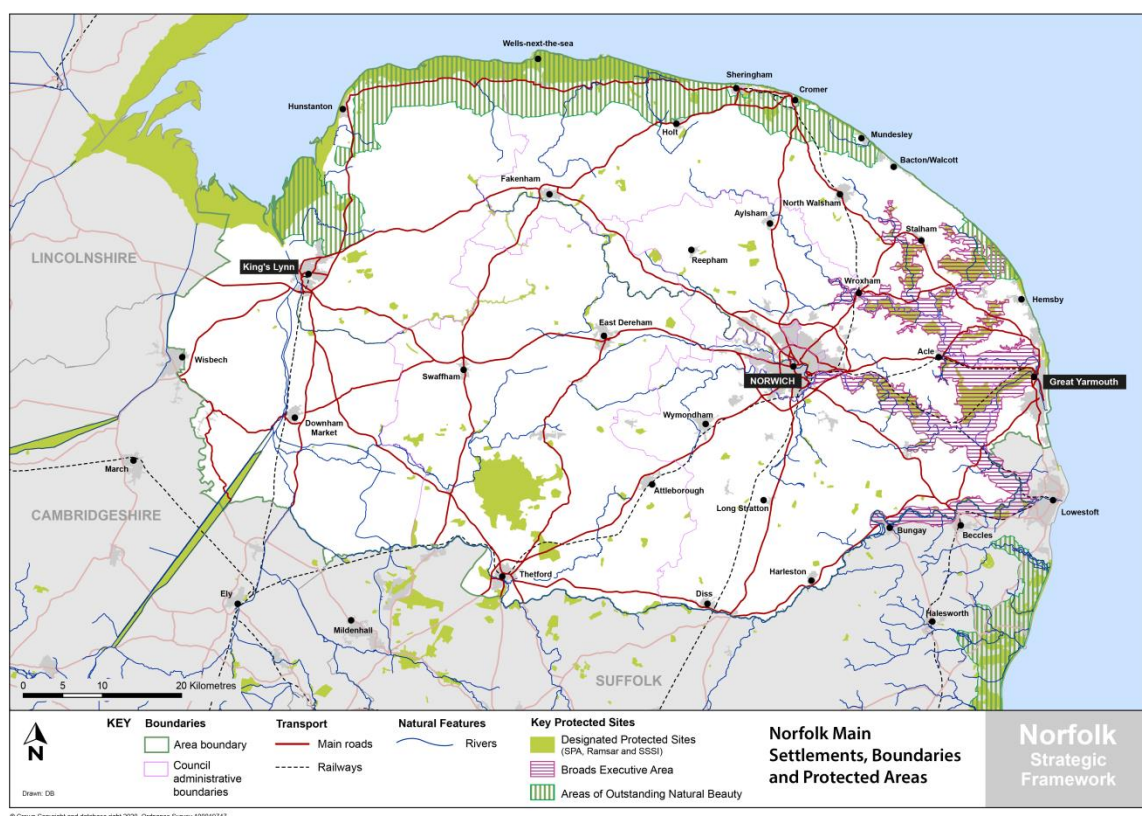


Figure 2: Map of Norfolk's main settlement, Authority boundaries, major transport connections and land-based protected areas. 2021

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, this area is covered by the East Inshore Marine Plan⁷. It contains many environments which are highly valued for their landscape and seascape, and for their biodiversity and/or geodiversity interests. In

⁵ Mid year 2019 ONS estimate see [Norfolk Insight web page - http://www.norfolkinsight.org.uk/population](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

⁷ See [East Inshore Marine Plan - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/312496/east-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/312496/east-plan.pdf)

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.

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 average⁸, 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.

Norfolk's infrastructure is 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 and the completion of the Broadland Northway (previously known as the Northern Distributor Road) improved travel time and connectivity considerably, and 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 businesses⁹. However, the picture regarding superfast broadband coverage is rapidly improving; currently 95% of the county's homes and businesses are able to access speeds of 24Mbps+¹⁰, up from 42% in 2012¹¹.

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 by the Strategic Planning Member Forum. For further information on the background to this material please see the papers previously considered by the Member Forum¹².

⁸ See [NEW Anglia LEP Economic Strategy page 7 - https://newanglia.co.uk/wp-content/uploads/2020/03/New-Anglia-LEP-Economic-Strategy-Annual-Progress-Report-FINAL-WEB-version-medium-res.pdf](https://newanglia.co.uk/wp-content/uploads/2020/03/New-Anglia-LEP-Economic-Strategy-Annual-Progress-Report-FINAL-WEB-version-medium-res.pdf)

⁹ See [County Council Mobile Map page - www.norfolk.gov.uk/mobilemap](http://www.norfolk.gov.uk/mobilemap)

¹⁰ See Better Broadband for Norfolk Website

¹¹ See Better Broadband for Norfolk Information Sheet 26 (26 May 2017)

¹² See [papers for the 13th October 2016 Member Forum at www.norfolk.gov.uk/nsf](http://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 and Health 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 the Norfolk 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, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- 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;
- 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 the need to re-examine and revitalise the role of town centres as a focus for investment and enhancing the quality of life for residents;
- recognising that the long term conservation, investment in and enhancement of Norfolk’s natural environment and heritage is a key element of the county’s competitiveness and contributor to the Norfolk economy;
- ensuring a healthy workforce through well planned sustainable communities where people can walk and cycle to work or use public transport or work effectively from home;
- recognise that housing underpins economic growth;
- Maximising the opportunity a clean/green economic recovery presents for the region and the new jobs which will be required to achieve the Governments net zero target

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

- locating development so as to reduce the need to travel;
- reducing unnecessary car use and supporting the roll out of new technologies (such as Electric Vehicles and alternative fuels eg hydrogen) and alternative methods of transport including 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.

Together these measures will help create healthier more sustainable communities.

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 Strategy of the New Anglia LEP, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- 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 and health for all the population of Norfolk by:

- promoting development and design which seeks to actively improve health, prevent ill health and tackle widespread health inequalities
- 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;
- Protecting and enhancing water, air, soil and other natural resource quality where possible; and
- Leaving the environment in a better state for future generations.

Section 3 – Understanding the County

3.1 Administrative Boundaries

Within Norfolk there are seven separate District Council areas¹³ (as shown in Fig.2), each of which is a Local Planning authority. Overlying parts of five of these areas (and also part of East Suffolk 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 the figure below.

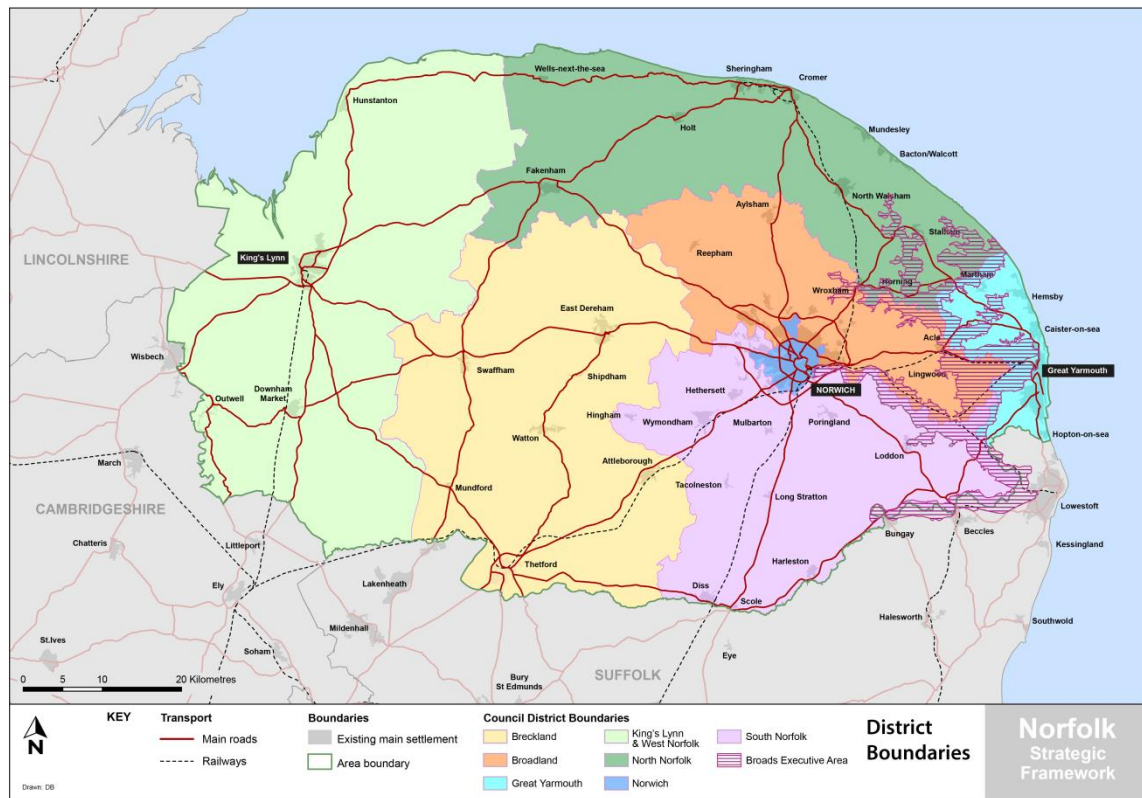


Figure 3: Map of Norfolk District boundaries and the major transport connections. 2021

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).

The 25 Year Environment Plan requires that marine plans are adopted by 2021. The Marine and Coastal Access Act 2009 provides the domestic legislative basis for the marine planning system. The Marine Policy Statement was adopted by all UK Administrations in March 2011, which provides the policy framework for the preparation of all UK marine plans. It contains a range of policy objectives and considerations, which were used to inform decision-making in the absence of a marine plan.

¹³ 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.

Marine plans translate the Marine Policy Statement into detailed policy and spatial guidance for each marine plan area. Section 58 of the Marine and Coastal Access Act 2009 states that all public bodies making authorisation and enforcement decisions which affect or might affect the UK marine area, must do so in accordance with the adopted marine plan. All other decisions must be made with regard to the Marine Plan, for example, when a public or local authority creates or reviews a local plan.

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority for England), the Marine Management Organisation (MMO) is responsible for preparing marine plans for English inshore and offshore waters. The East Marine Plans will inform and guide decision-makers on developments which may have an impact on the marine and coastal environment. As the marine planning authority for England, the Marine Management Organisation (MMO) is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, the East Inshore Marine Plan applies up to the mean high water springs mark, which includes the tidal extent of any rivers. The East Marine Plan will therefore overlap with terrestrial plans which generally extend to the mean low water springs mark. 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 linkages¹⁴.

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*

¹⁴ 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.

which a substantial majority of the employed population both live and work and where those moving house without changing employment choose to stay”¹⁵. 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 4.

Prior to the introduction of a new housing methodology in the revised National Planning Policy Framework in July 2018, the Norfolk Districts and the Broads Authority had produced Strategic Housing Market Assessments (SHMAs) which covered the entire County¹⁶. Within the Central Norfolk SHMA area (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.

¹⁵ Local Housing Systems Analysis: Best Practice Guide. Edinburgh: Scottish Homes

¹⁶ See [Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)
[KLWN SHMA - https://www.west-norfolk.gov.uk/download/downloads/id/1736/shma_document.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/1736/shma_document.pdf)
[Great Yarmouth SHMA - https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241](https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241)

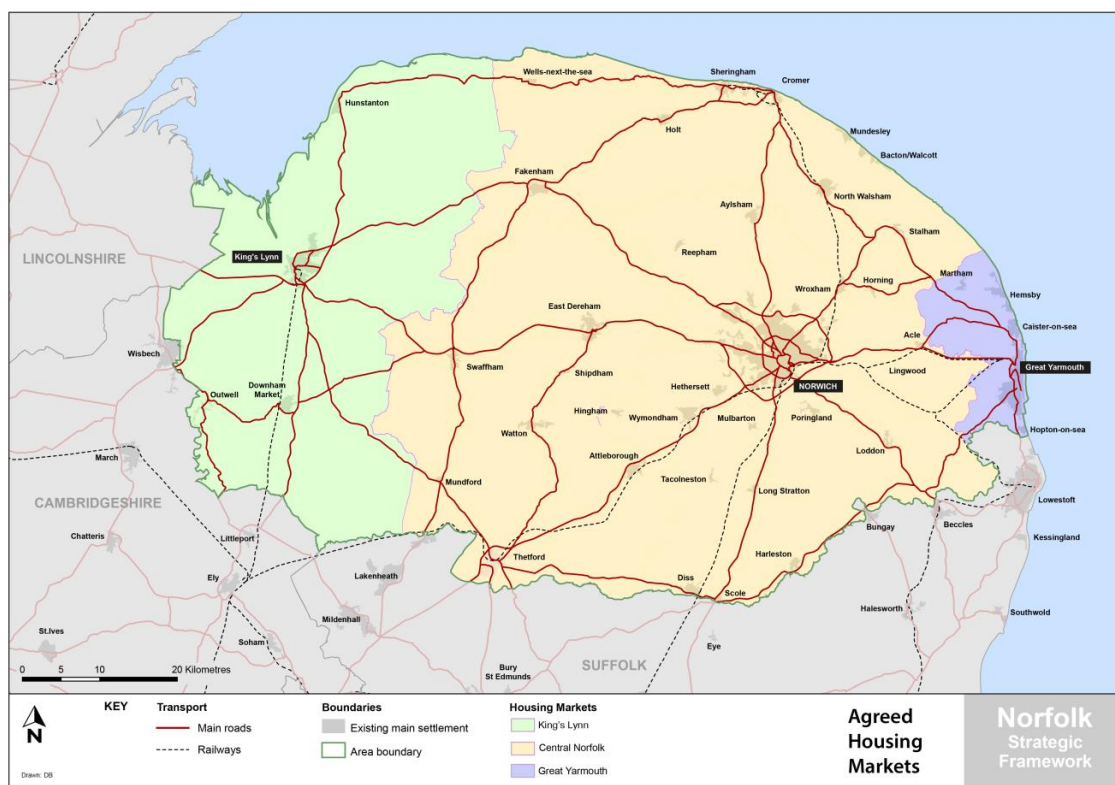


Figure 4: Map of Norfolk Agreed Housing Market Areas. 2021

Agreement 4 –To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

The housing needs of the relevant parts of the Broads Authority Area are included within the SHMAs for Central Norfolk, Great Yarmouth and East Suffolk. The level of need within the Broads Authority area is specified within the Central Norfolk SHMA¹⁷. The new Government methodology cannot be used to calculate the housing requirements within the Broads area, therefore there remains a requirement for the Broads Authority to calculate a separate housing need when it reviews its local plan.

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 Assessment¹⁸ defines a core housing market area identifying the settlements with the strongest

¹⁷ See [pages 132-134 of the Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)

¹⁸ See [pages 35-36 of the Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)

connections to the Norwich Urban Area. This supports the decision to prepare separate Local Plans for North Norfolk and Breckland District Councils (see below).

Following the introduction of a New Housing Methodology in the Revised National Planning Policy Framework in July 2018, 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.

To help understand for the right mix of home types and tenures King's Lynn and West Norfolk have commissioned a Housing Needs Assessment in 2020¹⁹, North Norfolk has commissioned a SHMA update in 2019²⁰ and the districts in the rest of the county plan to complete similar exercise in the near future.

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 over the page in Figure 5. Information on retail matters are captured within the existing evidence base supporting Local Plans²¹. 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 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

¹⁹ See [West Norfolk Housing Needs Assessment - https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf)

²⁰ See [North Norfolk Housing Needs Assessment - https://www.north-norfolk.gov.uk/media/5528/shma-local-housing-needs-assessment-2019.pdf](https://www.north-norfolk.gov.uk/media/5528/shma-local-housing-needs-assessment-2019.pdf)

²¹ See [in particular the Employment, Town Centre and Retail Study for the greater Norwich Local Plan - https://gnlp.oc2.uk/document/14/4552#d4552](https://gnlp.oc2.uk/document/14/4552#d4552)

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 low²². Both Thetford and Mildenhall and Cromer and Sheringham are still regarded as being distinct Travel to Work Areas. These are illustrated below.

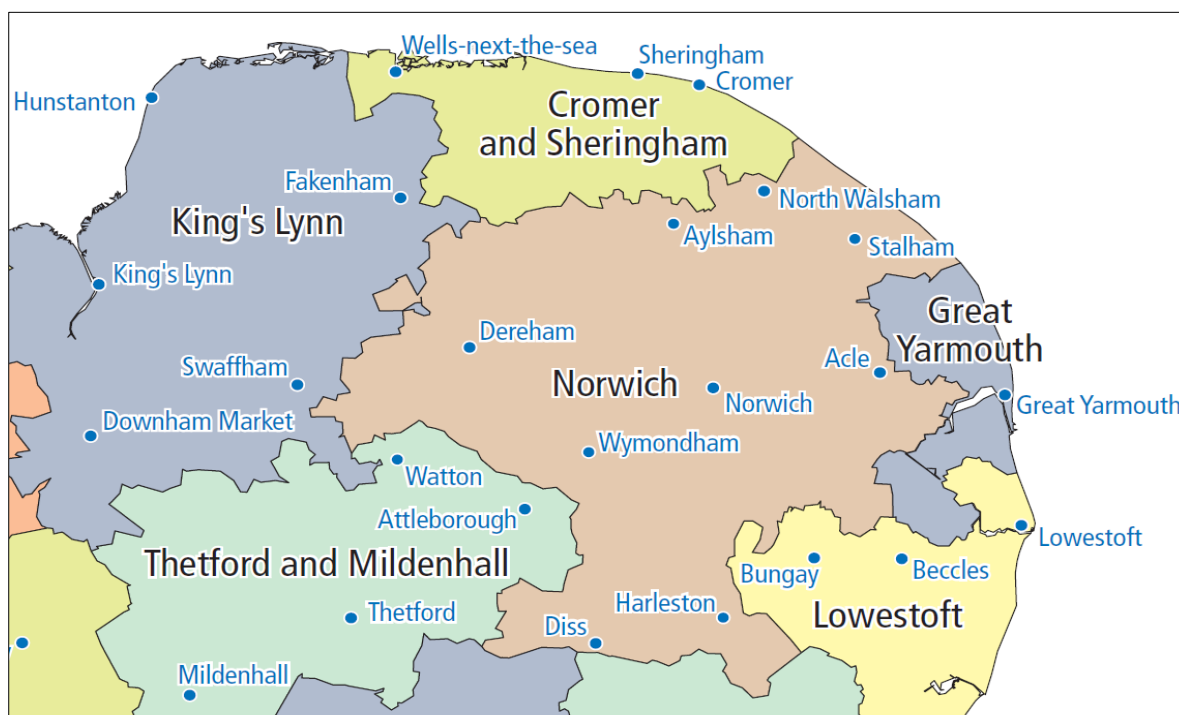


Figure 5: Norfolk's 2011 travel to work areas (TTWAs). Source: ONS 2015

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

²² 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.

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. The Broadland Northway which completed in Spring 2018 is a key part of the Norwich Area Transportation Strategy which also includes considerable investment in a range of other improvements across Norwich²³. The A17 is an important part of the road network, serving longer-distance trips, and has been included as part of the Major Road Network, a category of the road network comprising the country's busiest and most economically important A class roads in local-authority control.

The Highways (England) Roads Investment Strategy contains a number of improvement schemes for the A47 as part of the government's trunk road programme to be delivered by 2025:

- 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 2022.

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

- Replacement of the entire fleet of trains ;
- 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.

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

²³ See [Norwich Area Transportation Strategy - www.greaternorwichgrowth.org.uk/dmsdocument/554](http://www.greaternorwichgrowth.org.uk/dmsdocument/554) for further information

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 revised NPPF the government introduced the requirement to produce a Statement of Common Ground (SCG) over the housing market area or other agreed geographical area where justified and appropriate.

In light of this requirement 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.

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 Compendium²⁴.

3.5 Other Joint Initiatives and Neighbouring Strategic Partnerships

Given the high degree of self-containment in relation to the housing market and travel to work areas the framework relates principally to the county of Norfolk although where appropriate cross boundary initiatives are in place. For example planners from all of the Norfolk and Suffolk coastal local planning authorities, including the Broads Authority have also held a series of meetings over the latter part of 2017/early 2018 to share knowledge and experience and identify common interests around the coastal planning process. This has led to the creation of a separate 'Coastal' Statement of Common ground being developed²⁵ and work is underway to produce a coastal adaption Supplementary Planning Document. Other joint working arrangements include a Statement of common ground between Great Yarmouth and East Suffolk and the Cambridge Norwich Tech corridor, further details of cross boundary initiatives are in appendix 2.

²⁴ See [Norfolk Compendium of Local Plans on https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use-policies](https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use-policies)

²⁵ See [Statement of common ground coastal zone planning report - https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/strategic-member-forum/nspmf-statement-of-common-ground-coastal-zone-planning-report-180712.pdf](https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/strategic-member-forum/nspmf-statement-of-common-ground-coastal-zone-planning-report-180712.pdf)

Norfolk is bounded by Suffolk to the south and Cambridgeshire and Lincolnshire to the West. Strategic partnerships are being developed in these neighbouring areas in response to national objectives for additional homes, jobs and enhanced infrastructure.

Following the formation of the Combined Authority (CA) for Cambridgeshire and Peterborough, the CA produced the Cambridgeshire and Peterborough Strategic Spatial Framework²⁶ in March 2018 which brings together the current growth ambitions of the area, and how the Combined Authority can support local jobs and housing growth ambitions. The Combined Authority are engaging with its partners and other stakeholders to continue to develop the second half of the Strategic Spatial Framework.

In Suffolk, the Suffolk's Inclusive Growth Framework²⁷ has been refreshed and relaunched by the Suffolk Growth Partnership in November 2020. The Framework brings together the shared growth work that is being taken forward across Suffolk into a single, cohesive programme.

The Framework:

- Presents the starting point and ambitions to allow local authorities to engage with communities, partners and Government with a clear and consistent message
- Sets out a single, concise summary of the work being taken forward to plan, coordinate and deliver growth across Suffolk
- Enables connections between programmes of work across the public sector, thereby minimising duplication and ensuring greater benefit is delivered through our investments

To the west of Norfolk the South East Lincolnshire Local Plan²⁸ was adopted in March 2019 by the Joint Strategic Planning Committee. The Committee is a partnership of Boston Borough, South Holland District and Lincolnshire County Councils who are working together to plan the future of South Holland District and Boston Borough.

Across the wider region Norfolk is represented at the East of England Local Government Association and on the East of England Strategic Spatial Planning Officers' Liaison Group (SSPOLG) The role of the latter is to coordinate technical and policy work relevant to councils in the East of England on strategic economic, planning and infrastructure challenges, with a particular focus on engagement with London and the Wider South East.

Norfolk Authorities will continue to work with authorities in the region through their strategic partnerships and national initiatives to ensure a complementary, integrated approach to growth and to optimise investment opportunities to achieve mutually beneficial outcomes.

²⁶ See [Cambridgeshire and Peterborough Strategic Spatial Framework - https://cambridgeshirepeterborough-ca.gov.uk/assets/Combined-Authority/NSSF-Phase-1-final.pdf](https://cambridgeshirepeterborough-ca.gov.uk/assets/Combined-Authority/NSSF-Phase-1-final.pdf)

²⁷ See [Suffolk's Inclusive Growth Framework - https://27ea8bdd-fa24-451b-baf1-35bcfe30437b.filesusr.com/ugd/43f74e_988022cc644f4ac79d4bf0743468fa32.pdf](https://27ea8bdd-fa24-451b-baf1-35bcfe30437b.filesusr.com/ugd/43f74e_988022cc644f4ac79d4bf0743468fa32.pdf)

²⁸ See [South East Lincolnshire Local Plan - http://www.southeastlincslocalplan.org/adopted-plan/](http://www.southeastlincslocalplan.org/adopted-plan/)

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 March of 2020²⁹. These show an increase in the rate of overall population growth from the 2016 ONS figures, Table 1 shows a growth in population levels of 11% over the 18 year period from 2018-2036. Districts are projected to see a significant variation in levels of population growth of between 4% in King's Lynn and West Norfolk to 23% in South Norfolk.

Table 1: Current and projected population numbers for Norfolk Districts. Source: ONS, 2020

District	2018 (000's)	2036 (000's)	Population growth 2018-2036 (%)
Breckland	139.3	158.6	13
Broadland	129.5	145.8	13
Great Yarmouth	99.4	104.7	5
King's Lynn And West Norfolk	151.8	157.7	4
North Norfolk	104.6	114.9	10
Norwich	141.1	150.3	7
South Norfolk	138	169.2	23
Norfolk	903.7	1001.2	11

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 major 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 over the page.

²⁹ Available at [ONS population projections - https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2](https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2)

Table 2: Existing population numbers (000s) and % by age quartiles (2018) and projected population numbers and % by age quartiles (2036) of Norfolk Districts. *Source: ONS*

District	2018				2036			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	139.3	29.5 (21.2)	75.3 (54.1)	33.5 (24)	158.6	30.6 (19.3)	78.6 (49.6)	49.4 (31.1)
Broadland	129.5	26.4 (20.4)	69.9 (54)	33.2 (25.6)	145.8	27.8 (19.1)	73.4 (50.3)	44.6 (30.6)
Great Yarmouth	99.4	22 (22)	53.4 (53.7)	24 (24.1)	104.7	20.4 (19.5)	51.9 (49.6)	32.4 (30.9)
King's Lynn And West Norfolk	151.8	32.2 (21.2)	80.4 (53)	39.1 (25.8)	157.7	30.4 (19.3)	76.3 (48.4)	51 (32.3)
North Norfolk	104.6	18.1 (17.3)	52.2 (49.9)	34.3 (32.8)	114.9	17.2 (15)	51.7 (45)	45.9 (39.9)
Norwich	141.1	31.7 (22.5)	88.5 (62.7)	21 (14.9)	150.3	30.8 (20.5)	92.7 (61.7)	26.9 (17.9)
South Norfolk	138	30.6 (22.2)	74.3 (53.8)	33.1 (24)	169.2	35 (20.7)	86.4 (51.1)	47.8 (28.3)
Norfolk	903.7	190.5 (21.1)	494 (54.7)	219.3 (24.3)	1001.2	192.2 (19.2)	4511.1 (51)	298 (29.8)

Table 3: Change in 000s between 2018 and 2036. Difference between 'All People' for each district between 2016 and 2036 in %. *Source: ONS*

District	Difference between 2018 and 2036			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	19.3	11.1 (-1.9)	3.3 (-4.5)	14.9 (7.1)
Broadland	16.3	1.4 (-1.3)	3.6 (-3.7)	11.4 (5)
Great Yarmouth	5.4	-1.6 (-0.5)	-1.5 (-4.1)	8.4 (6.8)
King's Lynn And West Norfolk	5.9	-1.8 (-1.9)	-4 (-4.6)	11.8 (6.5)
North Norfolk	10.3	-0.8 (-2.3)	-0.5 (-4.9)	11.6 (7.1)
Norwich	9.2	-0.9 (-2)	4.2 (-1)	5.9 (3)
South Norfolk	31.2	4.4 (-1.5)	12.1 (-2.7)	14.7 (4.3)
Norfolk	97.5	1.7 (-1.9)	17.1 (-3.7)	78.2 (5.5)

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 80% of the total increase between 2018 and 2036 being accounted for by growth in the over 65s³⁰. Between the ages of 20 and 64 population growth is projected to be slow, with only a 3% growth rate over the 18 year period, whilst the numbers of 0-19 years olds are projected to grow very slowly by just 0.9%.

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.

The 2019 Health profile for England³¹ suggests:

- Improvements in life expectancy in England are uncertain with provisional data showing that life expectancy at has seen no improvement from 2017 figures.
- The number of years spent in poor health is increasing. This will impact the need for particular housing, transport and service delivery solutions

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.

³⁰ Total growth in population age 65 plus is 78,200

³¹ <https://publichealthengland.exposure.co/health-profile-for-england-2019>

4.2 Household Projections

The most recent set of household projections were published in June 2020³². For the country these 2018 projections are broadly in line with the 2016 projections, however for Norfolk these show a significant increase in households, by approximately 9000 by 2036, over the 2016 household projections. Similar patterns of growth are shown as for population but 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. The new household projections also show greater growth in the more rural districts compared to previous versions of the projections.

Table 4: ONS 2018 household projections. Source: ONS

District	2011	2018	2026	2036	Household growth 2018-2036 (%)
Breckland	54,522	58,612	63,815	69,497	19
Broadland	53,343	55,676	59,997	64,593	16
Great Yarmouth	41,988	43,350	45,460	48,106	11
King's Lynn and West Norfolk	62,928	64,461	66,522	69,539	8
North Norfolk	46,033	48,448	51,374	55,390	14
Norwich	59,587	63,012	64,778	68,088	8
South Norfolk	52,825	60,172	67,140	75,221	25
Norfolk	371,225	391,737	419,086	450,434	15

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 online³³.

Table 5 sets out the headline results for Norfolk Districts produced in the 2017 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, and the model has yet to be run to take account of the impacts of both the Coronavirus and the UK leaving the European Union. In addition, the reliability of a number of the underlying datasets decreases at smaller scales, and

³² See [ONS household projections - https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections](https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections)

³³ See [East of England Forecast Model website - http://cambridgeshireinsight.org.uk/EEFM](http://cambridgeshireinsight.org.uk/EEFM)

economic activity is not limited by council boundaries, so individual sector and District forecasts should be treated as being broadly indicative.

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 92% of all the net growth in Norfolk will take place in Greater Norwich.

Table 5: Total employment by district. Source: EEFM 2017 and Central Norfolk SHMA

Districts	Total employment (000's)				2016-2036 growth (000's)
	2011	2016	2026	2036	
Breckland	49.8	57.5	58.2	59.8	2.3
Broadland	53.7	58.7	61.1	62.6	3.9
Great Yarmouth	41.9	43.9	45.9	47.6	3.7
King's Lynn & West Norfolk	62.6	68.9	71	72.3	3.4
North Norfolk	39.5	42.4	43.3	44.3	1.9
Norwich	89.5	102	108.4	113.3	11.3
South Norfolk	56.3	63.3	68.9	74.7	11.4
Greater Norwich*	199.4	223.9	250.3**	262.3**	38.4
Norfolk	393.3	436.7	468.7**	486.4**	49.6

*Broadland, Norwich & South Norfolk

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

Note: The Broads does not have its own jobs figures but any jobs delivered contribute to district target.

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, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- 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;
- 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 the need to re-examine and revitalise the role of town centres as a focus for investment and enhancing the quality of life for residents;
- recognising that the long term conservation, investment in and enhancement of Norfolk's natural environment and heritage is a key element of the county's competitiveness and contributor to the Norfolk economy;
- ensuring a healthy workforce through well planned sustainable communities where people can walk and cycle to work or use public transport or work effectively from home;
- recognise that housing underpins economic growth;
- Maximising the opportunity a clean/green economic recovery presents for the region and the new jobs which will be required to achieve the Governments net zero target

5.1 Strategic Principles of Economic Success

It is clear that Local Authorities will need to continue to work collaboratively with one another, the LEP 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 well serviced land and vacant 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
- recognising the contribution of Norfolk's market towns

Education and skills

- supporting the creation, expansion and enhancement of education establishments, including further education, technical institutes and universities to develop the right skills base 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.
- supporting the role of apprenticeships for retraining and up skilling the workforce including the expansion of the syllabus offered to meet the needs of locally based businesses
- supporting labour market resilience through initiatives including support for residents with health related problems to get back into work

New Anglia has been chosen as 1 of 2 pilots across the greater south east energy hub area to work with the energy systems catapult to develop the institutional and physical infrastructure to support the rapid deployment of high-quality training programmes needed to deliver cutting edge property decarbonisation schemes. This proposal seeks to address the gaps and shortcomings through a global and whole house skills and training approach that integrates technologies and delivers good outcomes for customers, rather than the piecemeal installation of measures.

Connectivity

- enhancing the provision of infrastructure to enable digital connectivity that will facilitate economic growth.
- 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; The new 'Norfolk & Suffolk Innovation Network' Funding will create a Long-Range Wide Area Network (LoRaWAN), for sending and receiving low power signals from digital sensors across the region. This will enable business, public sector, educational organisations and individuals to explore, trial and implement Internet of Things (IoT) technology.

5.2 Context

The recent growth in Norfolk's economy is driven by certain key sectors, 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 generally remained above national levels over the past 10 years (currently 77.7%, compared to the national level of 75.6%) and unemployment rates are generally below the national level and lower than they were 10 years ago³⁴.

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.

Whilst many districts have their own economic development strategies, the importance of working collaboratively across district boundaries is recognised. This Norfolk Strategic Planning Framework provides one of the foundations for cooperation as does the Norfolk and Suffolk Strategic Economic Strategy (NSES), published in 2017.

The Government published its Industrial Strategy White Paper, 'Building a Britain fit for the future' in November 2017⁴. 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 5 foundations of productivity and 4 grand challenges to put the UK at the forefront of the industries of the future.

In response, the New Anglia LEP, in consultation with stakeholders, produced the Norfolk and Suffolk Local Industrial Strategy (LIS) which was submitted to Government in Autumn 2019.

All of the Districts have formally endorsed working to deliver the NSES and there is a good record of collaboration on specific economic development projects. This Framework provides the opportunity to lay the foundation for developing a Norfolk Economic strategy which builds upon both the NSES and Districts own economic development strategies.

The Norfolk and Suffolk LIS and the Economic Strategy are designed to work in tandem and the targets set out in the NSES are still valid. Some of the key targets are summarised in Table 7.

³⁴ ONS Annual Population survey, (July 2017-June 2018)

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.

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 multi-site Enterprise Zones led by the New Anglia LEP, the Cambridge-Norwich Tech Corridor, innovation centres at King's Lynn and Hethel, and energy related Enterprise Zone sites across Great Yarmouth and East Suffolk.

5.2.1 Coronavirus Impacts

The impact of the Covid-19 pandemic has been profound with tens of thousands of lives lost, lockdown restrictions which have affected daily lives, and significant damage to the local and national economy. In response to the pandemic the New Anglia LEP, working with partners, has produced the Covid 19 Economic Recovery Restart Plan.

This restart plan sets out the actions and interventions that are being taken by a wide range of partners, including New Anglia LEP, local authorities, business, industry councils and sector groups, VCSE organisations, colleges and universities. It demonstrates the strong local appetite and energy for getting the local economy going again and helping those who have been hit hardest.

The Restart Plan contains an unprecedented package of measures delivered by partners locally and nationally to get businesses up and trading again, restore business, consumer and community confidence, as well as provide support to individuals made redundant and looking for work.

The Key measures include:

- Responding to redundancies to support individuals being made redundant and help businesses looking for workers.
- Advice and support for businesses - every business has access to the finance and support they need.
- Youth pledge to support young people to get into high quality education, employment, training, or an apprenticeship.
- Transforming skills to ensure everyone has access to opportunities to upskill and reskill
- Mental health and wellbeing programme that provides employers and employees with the mental health and wellbeing support they need.
- Reimagining high streets - support in developing a range of measures to help high street businesses reopen and operate safely.
- Visitor economy – launch a proactive campaign to promote the area as a destination to live and work

- Digitisation – launch a major campaign to support businesses to build their online presence and to improve productivity, including flexible working practices for their employees, through better use of technology.
- Supply chain – work with local companies to capitalise on opportunities to sell more goods and services locally
- Infrastructure – supporting the construction sector through continued investment in key infrastructure and make a compelling case to Government to fund priority infrastructure schemes.
- Norfolk & Suffolk Unlimited – develop a campaign to promote Norfolk and Suffolk as a place rich with investment opportunities.
- Safe and sustainable public transport – work to support and promote safe and sustainable public transport use, to continue to improve air quality and reduce congestion

This Restart Plan is the first of a two-stage economic recovery plan for the area. It will support businesses, individuals, communities, anchor institutions and further and higher education providers to start trading and living life with confidence, in an environment dominated by social distancing and economic uncertainty, as quickly and safely as possible. Both the restart and renew recovery plans will look to capitalise on the county's major strengths and new opportunities in clean energy, agri-food, information and communication technology and digital creative, alongside ensuring the foundation sectors get the support needed.

The second stage to the plan is the Renew Plan, this a longer-term plan for jobs and sustainable growth which will also serve to support the Government national recovery plan. The restart plan is also supported by the Visitor Economy Recovery plan and evidence base³⁵.

AGREEMENT 8 - Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan

³⁵See [New Anglia LEP Covid 19 Economic Recovery Restart Plan - https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf](https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf)

5.2.2 Climate Change

In November 2020 the government set out ambitions for investment in clean energy, transport and energy efficiency, designed to support the country's 2050 net zero emissions target and to support up to 250,000 new jobs. The 10-point plan³⁶ includes commitments on offshore wind, low carbon hydrogen production, electric vehicles and nuclear. Ten Point Plan are:

1. Advancing Offshore Wind
2. Driving the Growth of Low Carbon Hydrogen
3. Delivering New and Advanced Nuclear Power
4. Accelerating the Shift to Zero Emission Vehicles
5. Green Public Transport, Cycling and Walking
6. Jet Zero and Green Ships
7. Greener Buildings
8. Investing in Carbon Capture, Usage and Storage
9. Protecting Our Natural Environment
10. Green Finance and Innovation

The Energy white paper³⁷ expands on the Ten Point Plan and sets out the steps needed to cut emissions from industry, transport and buildings.

In March 2019, the UK Government and offshore wind industry agreed a Sector Deal, securing offshore wind's position at the heart of the future UK energy mix as a large-scale, low-carbon form of electricity.

5.2.3 Norfolk's Key Economic Sectors

There are significant geographic clusters of existing business activity that anchor the Norfolk economy, with a number of these offering significant potential for growth. The Norfolk and Suffolk Economic Strategy identifies nine key sectors:-

- Energy
- Advanced Agriculture, Food & Drink
- Life Sciences and Biotech (including health)
- ICT, Tech and Digital Creative
- Financial Services and Insurance
- Visitor Economy – Tourism and Culture
- Transport, Freight and Logistics
- Construction and Development
- Advanced Manufacturing and Engineering

³⁶ See [The Ten Point Plan for a Green Industrial Revolution -
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/
10_POINT_PLAN_BOOKLET.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf)

³⁷ See [Energy White Paper - Powering our Net Zero Future -
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/
201216_BEIS_EWP_Command_Paper_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf)

The new Local Industrial Strategy has further refined priority sectors as:-

- Clean Energy
- Agri-Food
- Information and Communications Technology and Digital Creative

Whilst acknowledging the other underpinning sectors listed in the NSES.

Clean and Renewable Energy

Norfolk is well placed to be a global exemplar for clean, low carbon energy production, exporting services and skills globally, whilst increasing the availability of affordable sustainable energy for local communities and businesses. Norfolk has expertise in many forms of energy generation and sits at the heart of the world's largest market for offshore wind energy. Planned investment in renewable generation will make it a significant supplier of renewable energy to the UK. As well as a key role in the production of energy, Norfolk is also playing a leading role in the transition to a zero-carbon economy working with the Greater South East Energy Hub to deliver local projects at scale that benefit communities, private investors and businesses operating in the low carbon sector is a priority. Transforming the local energy system and new innovations in wider energy resource use will drive productivity gains across all businesses. Bacton Gas Terminal in North Norfolk is a major component of UK energy infrastructure, providing one third of the UK gas supply, making it an essential component in ensuring the future energy security of the UK. The Local Energy East Strategy sets out collective ambitions to 2030 underpinned by a range of activities that the Local Energy East Network and the Greater South East Energy Hub will take forward to ensure that the remains at the forefront of clean growth in the UK and grasps the opportunities ahead.

Life Sciences and biotech

Norfolk's life sciences sector is home to innovative, high-tech businesses and research institutions with close links to the food, health and agriculture sectors. Norwich Research Park (NRP) - comprising UEA, John Innes Centre, Earlham Institute, Quadram Institute, The Sainsbury Laboratory and Norfolk and Norwich University Hospital - is a world-leading research base, at the forefront of global food and health research. It is Europe's largest single site hub of research, training, education, and enterprise in food and health. The £76m Quadram Institute at NRP is helping create a fundamental shift in the way we understand and address the impact of food on health

The New Anglia Local Industrial Strategy sets out a range of actions that will be taken forward to maximise the clean agri-food opportunity including:

- Invest in a Food Innovation Hub based at the Honingham Food Enterprise Zone to deliver business growth through innovation, productivity, processing, exports and supporting new start-ups.
- Develop a world-leading hub for plant and microbial research at the John Innes Centre.

Advanced Agriculture Food and Drink

Home to an advanced and nationally significant farming sector, alongside globally renowned food and drink companies and a world-leading research base centred at Norwich Research Park (NRP). Building on Norfolk's historical agricultural strengths the sector is globally renowned and nationally significant.

Alongside this are a host of nationally and internationally significant food and drink companies, supported by a local supply chain of firms specialising in the manufacture of machinery and equipment to support them. This sector is an important employer in both rural and urban areas

Norfolk is home to the Honingham Food Enterprise Zone and to a world-leading research base centred at NRP, Norfolk is at the forefront of global agri-tech research, whilst innovative and export-intensive firms continue to develop commercially successful feeders, spreaders and pesticides.

Water Resources East has been set up to work in partnership to safeguard a sustainable supply of water for the east of England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential. Water Resources East is supported by all authorities in Norfolk either through the County Council's board membership or as standard members themselves.

ICT, Tech and Digital Creative

Norwich hosts a growing cluster of digital creative businesses. The New Anglia Local Industrial Strategy highlights plans to create a new digital hub in Norwich for the incubation of start-ups and accommodation of scale-up businesses in the digital and creative cluster. The University of East Anglia plays a key role in Norwich's tech community, supporting and connecting many of the active business groups. Norwich University of the Arts (NUA), with its specialism in arts, design and media, is centre of the dynamic creative community and home to the Ideas Factory incubation centre for digital creative businesses and user experience Lab.

Water Resources East³⁸ has been set up to work in partnership to safeguard a sustainable supply of water for the east of England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential. Water Resources East is supported by all authorities in Norfolk either through the County Council's board membership or as standard members themselves.

Visitor Economy - Tourism and Culture

A varied and rich tourist offer, from coast and countryside to postcard market towns, underpinned by a dynamic and pioneering cultural sector boasting internationally celebrated brands. Norfolk is a successful destination, evidenced by a thriving visitor economy. The area has traditional holiday destinations including the North Norfolk Coast and Great Yarmouth, together with unique natural assets such as the Broads National Park, the Brecks, and Areas of Outstanding Natural Beauty. It also has the home of important heritage sites such as Norwich (England's most complete medieval city). Norfolk's vibrant cultural sector boasts award-winning theatres, major international festivals such as Norwich, England's first UNESCO City of Literature. The cultural and heritage sector and natural landscape plays a unique role in creating the 'sense of place' that makes the area a great place to live, work, learn, invest and do business in. The sector is an important employer and attracts significant investment from national and international funding bodies.

Financial services and Insurance

Greater Norwich has been a base for financial industries for over 200 years and is one of the largest general insurance markets in Europe. Recognised as a centre for excellence for financial and professional services, Norwich is home to a significant cluster of global firms. Boasting a financially literate, highly-skilled and stable workforce, and the first National Skills Academy in the UK for financial services.

³⁸ See [Water resources East Website - https://wre.org.uk/](https://wre.org.uk/)

Transport, freight and logistics

Great Yarmouth port has a regional focus relating to the offshore energy sector. The sector is characterised by a strong logistics sector with international firms. Clustered around Norwich, there is also a sizable aviation sector, specialising in maintenance and repair, as well as servicing the offshore industry. The recently opened Aviation Academy, in collaboration with KLM Engineering, is a specialist centre of aircraft, overhaul and maintenance.

Construction and Development

Norfolk has a large and diverse construction and development sector, the UK's largest urban extension in Broadland and emerging specialisation in modern methods of construction and sustainable design. Norfolk's economy and attractive location for housing has driven economic success in the construction and development sector. The Construction Industry Training Board (CITB), a partner in the national Sector Skills Council for the construction industry, is based in Bircham Newton. The area has significant levels of employment across all construction-related industries. The sector also has an emerging specialism in modern construction and sustainable design, with the Fabric First Institute at Easton & Otley College.

Advanced Manufacturing and engineering

The advanced manufacturing and engineering sector in Norfolk reflects the area's diverse economic strengths. The sector links into the supply chain of specialisms such as agriculture and food production, civil aviation, transport and energy. Hethel Engineering Centre is the regional hub for innovation and technology and has the potential to expand to meet the demand for incubation space in this growing sector. Businesses are working together with UEA, through the New Anglia Advanced Manufacturing Engineering sector group, to develop a new Institute for Productivity. This will build on UEA's expertise in business education and engineering. There are several specialist advanced manufacturing and engineering companies in the area at sites including Hethel and Thetford.

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 currently at 25% below the national average³⁹. This, coupled with low levels of investment, relatively poor infrastructure and skills attainment, impacts on potential future economic growth.

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.

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

³⁹ See [East of England Forecast Model - https://cambridgeshireinsight.org.uk/eefm/](https://cambridgeshireinsight.org.uk/eefm/)

chains in the manufacturing, engineering and energy sectors will enhance business sustainability and employment growth.

5.2.4 Sector impact of the Coronavirus

The Covid 19 Economic Recovery Restart Plan will support the restart and renew of the local economy and focus activity on stabilising and renewing the foundation industries recognised in the Economic Strategy and Local Industrial Strategy, including the care and VCSE sectors. Economic activity will recover as lockdown is lifted, but the speed and degree is uncertain and will vary by sector, the impact on each sector is considered below:

Agri-food - Unprecedented demand at food retailers has put pressure on the food system in some areas, whereas the closure of the hospitality industry has created surplus in others.

Clean energy - The global pandemic has affected both the supply and demand for energy.

ICT digital - The lockdown has led to homeworking en masse, with people looking for new ways to work, learn, shop and socialise virtually. Home working will help support more rural areas but will require improved access to broadband and other digital connectivity (see section 9.5).

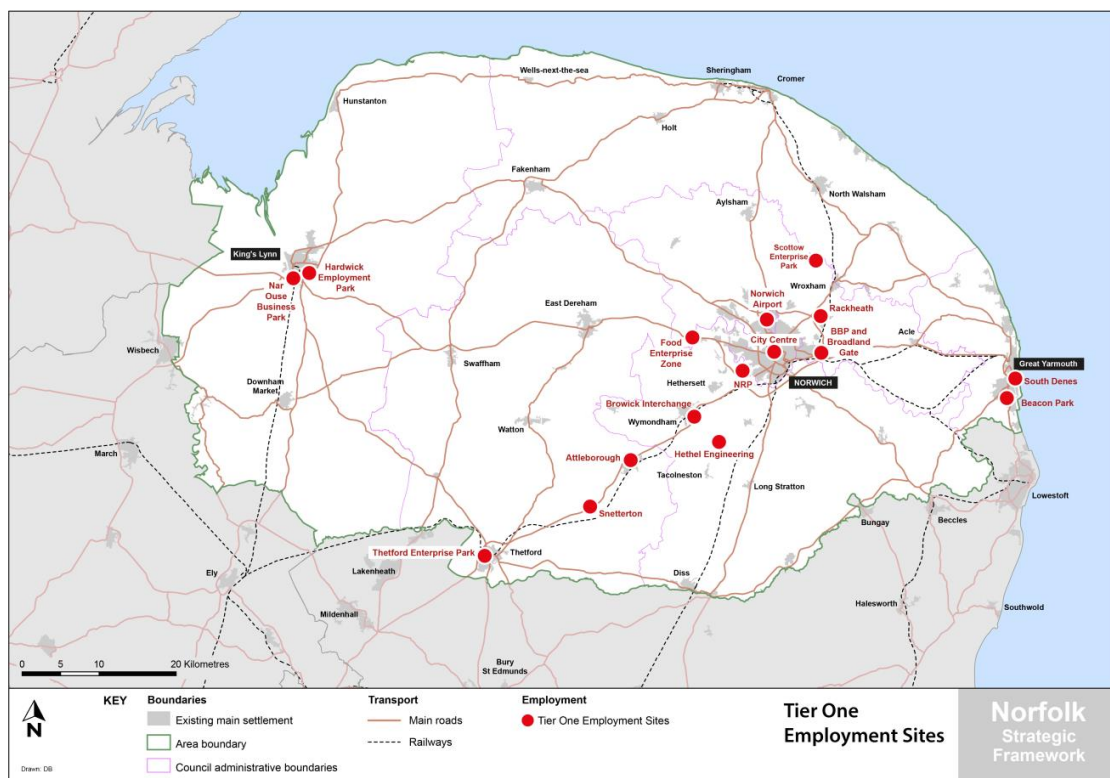
Visitor economy - The sector has been amongst the hardest hit, with businesses forced to stop trading just before the start of the season.

Health and social care - The pandemic has pushed the health and social care sector into the front line of dealing with the crisis. Nationally, care homes have seen high Covid-19 death rates in both residents and frontline staff, reinforcing the need for Personal Protective Equipment, correct training and capital Investment.

Voluntary - The pandemic has negatively affected resources, income and funding of third-sector organisations and impacted their ability to meet objectives in the longer term while demands continue to increase.

5.3 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 Economic Strategy and Local Industrial Strategy and are targeted at the Norfolk and Suffolk Economic Strategy'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 sites⁴⁰ 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 8 are formally recognised as “strategic” employment sites within Agreement 8.

⁴⁰ Tier 1 Employment sites are site identified by local authorities as significant in size (greater than 10 Hectares), Support key strategic sectors and support key growth locations.

Table 7: Tier one employment sites, sector, location and size. 2021

Site	Supports N&S Economic Strategy's Key Sector(s)	N&S Economic Strategy's Growth Location	Land available (approx.)
Attleborough	Advanced Manufacturing and Engineering	Tech Corridor	10 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	20 ha
Food Enterprise Zone Honingham/Easton	Food, Drink & Agriculture	Greater Norwich / Tech-corridor	10 ha
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)	Life Sciences Food, Drink & Agriculture	Greater Norwich Tech Corridor	40ha (EZ 25ha)
Rackheath	Advanced Manufacturing and Engineering	Greater Norwich	25 ha
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 9 - 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.

5.4 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;
- Coastal Change;

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.

5.4.1 The role of Greater 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 Broadland Northway 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. The proposed Western Link will further enhance access to the Norwich Research Park, Food Enterprise Zone and Norwich Airport.

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 Five Year Infrastructure Investment Plan identifies the projects from the Greater Norwich Infrastructure Plan the delivery of which is considered to be a priority for achieving the economic growth targets, as set out in the Joint Core Strategy and the Greater Norwich City Deal. The Greater

Norwich Growth Programme identifies infrastructure schemes to be prioritised for delivery and development within each financial year, using pooled CIL funding.

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. The work is now branded as Transport for Norwich (TfN). The TfN Strategy is being reviewed and a consultation is expected later on in 2020. The Implementation plan is currently being developed through the work on Transforming Cities and a bid has been made to Government to fund a 3 year programme of delivery.

5.4.2 Cambridge to Norwich Technology Corridor

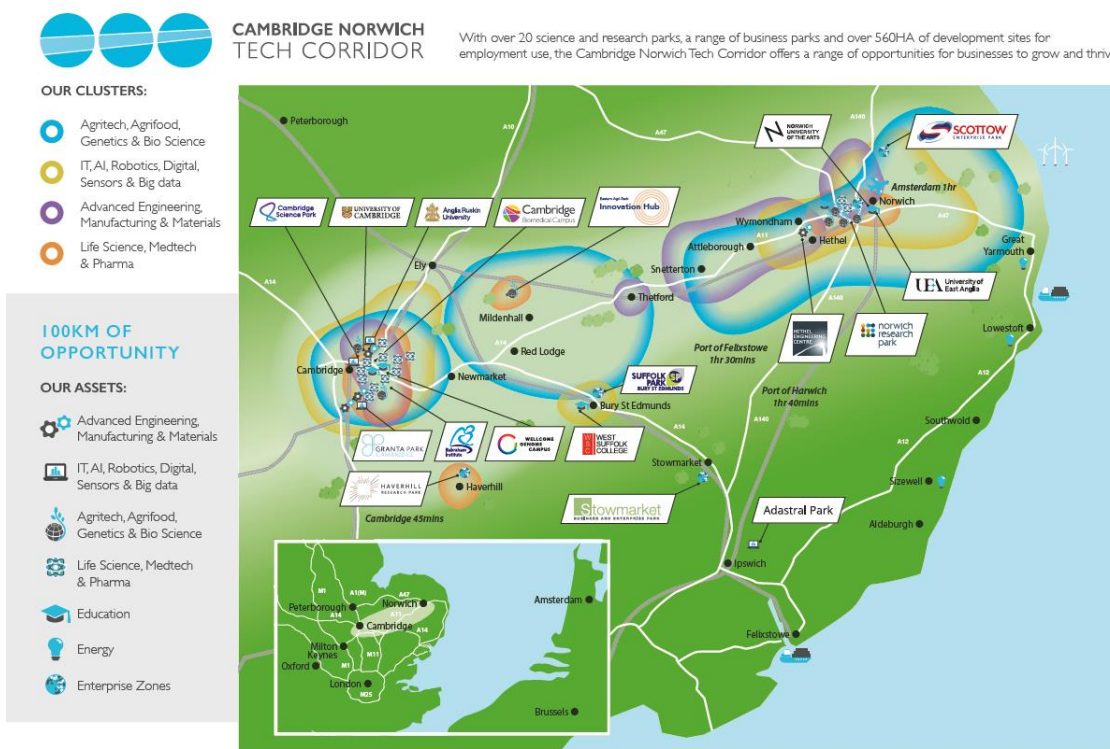
The corridor from Norwich to Cambridge, identified in Fig.7, includes a number of important existing and emerging clusters and strategic employment sites. It provides the potential for significant economic development, particularly as connectivity has improved with full dualling of the A11 between Norwich and Cambridge. The corridor also benefits from the Norwich to Cambridge railway line, direct trains between Norwich to Stansted airport and an increased number of internal and external route from Norwich Airport. 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 Economic Strategy, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan. The Cambridge Norwich Tech Corridor initiative⁴¹ has been established to maximise the economic benefits of this high quality location with its world class universities, research institutes and business clusters. The partnership will both capitalise on the talent pool, emerging clusters, low cost space, infrastructure networks, in conjunction with securing new investment for the area (e.g. SETI), to deliver innovation-led growth and investment.

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

⁴¹ See [The Norwich Cambridge tech corridor website - http://www.techcorridor.co.uk/](http://www.techcorridor.co.uk/) for further information

Figure 7: The Cambridge Norwich Tech Corridor, 2019



5.4.3 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.

Further west on the A47, 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.

Currently there are four A47 road improvement schemes of direct relevance to Norfolk, committed to by Highways England

- Dualling the A47 North Tuddenham to Easton
- Dualling the A47 Blofield to North Burlingham
- Improving the A47/A11 Thixhorne junction
- Improving A47 Great Yarmouth junctions including reconstruction of the Vauxhall Roundabout

These A47 road improvements have the potential to support growing the corridor's economy.

5.4.4 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 ports also serve trade, fisheries and transportation sectors of the economy.

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, East Suffolk, 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 East Suffolk 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. The third river crossing has now been through public examination as a Nationally Significant Infrastructure Project which will 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, construction is due to start in 2021.

Meanwhile Norfolk County Council with Great Yarmouth Borough Council, are looking at a range of new infrastructure projects associated with the port and the Great Yarmouth Energy Park in order to enhance the value of Yarmouth to the offshore renewables sector.

5.4.5 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 Authority 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), East Suffolk 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.

It is important that all of this care and concern about the natural environment continues to be captured within a Green Infrastructure approach, so that protecting and enhancing nature and natural processes are consciously integrated into spatial planning and area development.

5.4.6 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 Norfolk and Suffolk Economic Strategy. 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 has commissioned studies of the economic potential and transport options for the route north of Cambridge. The Ely Area Capacity Enhancements Strategic Outline Business case was completed in Spring 2020 and has been approved. Proposals and options are expected to be consulted on in 2021 for the Ely area improvements to enable more frequent rail services to operate in future; while works have been completed to enable longer trains to run from King's Lynn from December 2020. A new Cambridge North railway station has enabled improved access to jobs in the businesses on the north side of Cambridge for Norfolk residents. 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 10 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

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 in line with the Economic Strategy of the New Anglia LEP and, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- 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, those wishing to build their own home, starter homes to purchase and other tenures of affordable housing. Whilst this document considers the likely scale of growth in the different parts of the County, it is not its purpose to determine how many new homes are required or where precisely these should be located. These will be decisions for individual Local Plans or any County wide development plans which may be prepared. Instead the focus is on cross boundary strategic considerations concerning, for example, the capacity of each authority to accommodate the required growth, considering how growth in one area may have impacts elsewhere, the need or otherwise to redistribute growth beyond the administrative boundaries of individual authorities and the implications of this, or the need to take collective measures to improve the rates of housing delivery in the County.

In February 2017 the Government published the Housing White Paper “Fixing our Broken Housing Market”⁴². This document set out a broad range of reforms that Government planned to introduce to help reform the housing market and increase the supply of new homes with the principal aim of increasing housing delivery in England to 300,000 net additional dwellings per year by the mid 2020’s.

Many of these measures were subsequently introduced via the updated National Planning Policy Framework including a new standardised national methodology to be used for calculating the minimum number of new homes which might be required. In December 2020 the government announced a further modification to the standard methodology for the top 20 cities and urban areas, however this hasn’t impacted the county. The government has also introduced a Housing Infrastructure Fund⁴³, published a Garden Communities Prospectus, invited bids for Housing Deals, and has committed to spending an additional £2 billion on affordable homes, all measures targeted at delivering an increased supply of homes. 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.

Based on the government’s current standard methodology⁴⁴ Norfolk Authorities will need to collectively plan for at least an additional 65,856 (4,116 per annum) homes between 2021 and 2036. Many of these new homes are already included within adopted Local Plans in the County and a significant proportion already have planning permission.

As part of the duty to co-operate, and as reflected in the remainder of this section the Norfolk Authorities have reached a number of key agreements both about the geographical area over which it is most appropriate to prepare Local Plans, the period to be planned for, and how each plan will provide at least the minimum number of dwellings required over the agreed period. In reaching these Agreements the authorities have had regard to the needs which may arise from outside of the County and have collectively agreed a process for establishing each areas capacity to accommodate growth.

⁴² Available at [the housing white paper web page - https://www.gov.uk/government/collections/housing-white-paper](https://www.gov.uk/government/collections/housing-white-paper)

⁴³ Available at [the housing infrastructure fund web page - https://www.gov.uk/government/publications/housing-infrastructure-fund](https://www.gov.uk/government/publications/housing-infrastructure-fund)

⁴⁴ Derived from the ONS 2014 household projections

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

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 existing Local Plan targets has been increasing as local authorities seek to address shortfalls. Furthermore to ensure that local targets can be addressed national policy⁴⁵ requires that each authority provides a buffer of deliverable supply thus ensuring that at all times more deliverable supply is available than is required to meet needs alone, with the size of the buffer determined by delivery rates over the preceding three years. This has resulted in some areas having very high annual targets over the next five years which are well above the long term requirements set out in their respective Local Plans or produced by applying the standard methodology.

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, resulting in a large stockpile of consented 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. The impacts of the coronavirus pandemic on completion rates also remains unclear. 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.

⁴⁵ National Housing Delivery Test – Results of this test are published by government in November of each year and compare the number of dwellings built over a three year period with the number required.

6.3 Future Housing Demand and Need until 2036.

The National Planning Policy Framework requires that the need for homes in terms of quantity, size, type and tenure within an area is addressed by planning authorities when preparing Local Plans, unless the consequences of doing so would result in unsustainable development. Where planning authorities conclude that it is not desirable to address identified needs within an individual authority area they should reach agreement with others to ensure that needs are met.

Following the publication of the revised NPPF in Feb 2019 the quantity of homes needed should be calculated in accordance with the new standard method in national guidance. This applies a fixed uplift to household projections based on the relationship between local incomes and house prices for each authority area with the result being capped to ensure that resulting figures are no more than 40% above existing requirements for any individual authority. The method was varied in February 2019 to make it clear that the baseline for the calculation should be the 2014 based household projections rather than the most recent projections. In some parts of the County the application of the standard methodology has resulted in the need to deliver higher quantities of new homes than was previously the case as identified in Strategic Housing Market Assessments.

Table 9: Local Housing Need based on mid 2014 household projections applying standard national methodology using the projected average annual household growth from 2020 to 2030 (correct as at November 2020)

Area	Annualised housing need in SHMAs	Annualised housing need applying standard methodology (2014 base)	Variation
Breckland	584 ⁴⁶	661	+77
Broadland	389	517	+128
Great Yarmouth	420	357	-63
KLWN	670	538	-132
North Norfolk	405	552 ⁴⁷	+147
Norwich	724	598	-126
South Norfolk	763	893	+130
Broads Authority (Norfolk part)	11	n/a ⁴⁸	
Norfolk	3,966	4,116	+150

⁴⁶ 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

⁴⁷ At this point in time North Norfolk is considering if an alternative approach to establishing OAN is justified

⁴⁸ 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.

The evidence⁴⁹ 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 prior to the publication of the Standard National Housing Needs Methodology identified the objectively assessed needs for new homes within each HMA and for each separate District within them. 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 have formally commenced the process of plan review. Broadland, Norwich and South Norfolk are producing a single Greater Norwich Local Plan allowing for consideration of how needs might be addressed across the larger plan area.

Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). 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.

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 10: Projected dwelling need within the Broads Authority area 2015-2036

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

⁴⁹ **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.

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 area⁵⁰. 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 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.

Agreement 13 – 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.

East Suffolk Council (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 signed⁵¹. 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.

The housing implications of the City Deal were assessed thoroughly as part of the Central Norfolk SHMA. This calculated that an upward adjustment of 9,505 dwellings to the housing requirement was needed to ensure sufficient homes are provided to meet the needs of the additional workers resulting from the City Deal. However, as the OAN for the Central Norfolk Authorities already included a response to market signals, it concludes that 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. Because of the changes in calculating housing need the additional provision will be reconsidered within the Greater Norwich Local Plan.

Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

⁵⁰ See [Planning for Housing and Employment in and Around the Broads Memorandum of Understanding - 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](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)

⁵¹ See [Norwich City Deal - https://www.gov.uk/government/publications/city-deal-greater-norwich](https://www.gov.uk/government/publications/city-deal-greater-norwich)

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. For example, all authorities in the County have committed to introducing lower water consumption targets for new dwellings and most are likely to introduce enhanced accessibility requirements. Further consideration is also given to this area in the section on climate change.

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 increase in the availability of forms of housing that meet the needs of people who are employed in low wage sectors across the county. The situation will vary from one council area to another so is best addressed through local plans rather than through collective agreement.

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% (153,372 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 evidence 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 Objectively Assessed Need 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 then these people will not vacate existing dwellings and therefore more dwellings may be required.

As section 4 highlights, latest population projections estimate an increase in 65's of over 78,000 between 2018 and 2036 in the county. Local planning authorities were clear that further research was required into their housing needs. As part of the work to update this document a study was commissioned to identify the need and types of accommodation which are required to support the increase in the elderly population going forward.

The study has now been completed and highlights that a range of housing types are required to meet the needs of the elderly. It should be noted the many residents will be able to remain in conventional type of housing for many years but may choose to downsize or move to more suitable types of home like bungalows. Therefore housing types range from conventional housing (either modified or unmodified), age exclusive housing, sheltered housing with low level support to higher level support housing with on-site support or residential/nursing care homes. There are currently 8,612 units of specialist independent retirement housing in Norfolk, 78% of these units are sheltered⁵² housing with low level support and only 22% are extra care with higher level support⁵³. Across the whole of Norfolk in 2020 there is unmet need for 2,826 units of extra care housing and 4,034 units of sheltered housing. By 2041 these figures will have risen to 5,149 and 10,384 respectively. The report also highlights that care homes will also need to accommodate an additional 5,239 people and better provision should also be made for elderly with various levels of dementia with Norfolk likely to see an increase in residents with dementia by nearly 10,000 to 2041. Full details can be found in the report accompanying this study⁵⁴ Norfolk Local Authorities will work with registered providers and housing associations to support the delivery of specialist housing to meet the needs of an increasingly the elderly and retired population.

⁵² Sheltered housing is age restricted housing normally with either an onsite or visiting scheme manager or access to a bespoke helpline. There will normally be communal facilities which may include a café or shop but there is no bespoke site specific care package. Scheme residents are typically 75 or over, but the scheme may include some residents aged 65-74

⁵³ Extra Care housing is age restricted housing with an onsite scheme manager and provide a range of communal facilities. However residents will also have access to a site specific bespoke care package, usually including paying for a specified minimum number of hours of care a week with the option to increase usage if required. The care provider is CQC registered with specific carers allocated to the scheme. Scheme residents are typically 75 or over. Extra care housing can also be known as very sheltered housing, assisted living, enhanced sheltered or as housing with care.

⁵⁴ Link to study once published

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 16,030 full time students (academic year 2018/19). In 2017 the University had 4,300 bed spaces on the campus (and nearby village) and 305 bed spaces in the city. Norwich also contains the Norwich University of the Arts which has 2,250 full-time students, with further students at City College and Easton College. In recent years however, there has been an increase in the provision of privately owned and managed purpose built student accommodation across Norwich City including significant accommodation at Pablo Fanque House, Ber Street and St Stephen's Towers.

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.

However, in 2018 Planning Practice Guidance updated the advice on including student housing within housing supply figures⁵⁵. Student accommodation can be included based on the amount of accommodation that new student housing releases to the wider housing market, and the extent to which this allows general market housing to remain in such use. Local authority's calculations should be based upon the average number of student living in student only accommodation using the most recently published census data. On this basis, student accommodation supply in Norwich should be counted at a ratio of 2.85 bedrooms to 1 equivalent dwelling, except for studio apartments which can be counted on a 1 for 1 basis. For delivery purposes, the Housing Delivery Test Rule Book⁵⁶ outlines that student accommodation should be counted at a ratio of 2.5 bedrooms to 1 equivalent dwelling. These ratios will be updated as necessary.

⁵⁵ [Planning Practice Guidance - https://www.gov.uk/guidance/housing-supply-and-delivery](https://www.gov.uk/guidance/housing-supply-and-delivery) Paragraph: 034
Reference ID: 68-034-20190722

⁵⁶ [Housing Delivery test - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf)

The City Council also adopted the Purpose Built Student Accommodation (PBSA) Evidence and Best Practice Advice Note⁵⁷ in 2019. This advice note includes an assessment of the need for PBSA from UEA and NUA higher education institutions, guidance on a range of issues relating to the design and management of PBSA and how to encourage a mix of accommodation for a wide range of students. By encouraging good quality and appropriate student accommodation in Norwich, this advice note helps to support the success of the city's higher educational institutions and the city's economic prospects. As part of this Norwich City Council has set up a working group with the two main higher education institutions in Norwich that are likely to generate student housing need, and meets periodically to discuss how to help meet the need for PBSA in terms of student numbers and growth, to better inform planning decision making and the plans of Higher Education Institutions and to provide a forum to explore how high quality and affordable student accommodation can be achieved in Norwich.

The draft Greater Norwich Local Plan, due to be published for Regulation 19 consultation in February 2021, will contain a policy to support PBSA as part of policy 5(Homes).

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

The accommodation needs of Gypsies and Travellers, including Travelling Show people, 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 2017⁵⁸. Breckland DC commissioned its own study⁵⁹ and the Borough Council of King's Lynn and West Norfolk is a partner in a Cambridgeshire-based needs assessment⁶⁰. Greater Norwich are updating their study and this is expected to be completed in spring 2021.

Agreement 15 - 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.

⁵⁷ [Purpose Built Student Accommodation \(PBSA\) Evidence and Best Practice Advice Note - https://www.norwich.gov.uk/downloads/file/5448/pbsa_best_practice_and_advice_note_-_adopted_november_2019](https://www.norwich.gov.uk/downloads/file/5448/pbsa_best_practice_and_advice_note_-_adopted_november_2019)

⁵⁸ See [Caravans and Houseboats Needs Assessment to 2036 - https://www.norfolk.gov.uk/media/4081/norfolk-final-ana-09-10-17.pdf](https://www.norfolk.gov.uk/media/4081/norfolk-final-ana-09-10-17.pdf)

⁵⁹ See [Breckland Gypsy and Traveller Accommodation Assessment - https://www.breckland.gov.uk/media/2662/Breckland-Gypsy-and-Traveller-Accommodation-Assessment/pdf/2016_11_29_Breckland_GTAA_Final_Report.pdf](https://www.breckland.gov.uk/media/2662/Breckland-Gypsy-and-Traveller-Accommodation-Assessment/pdf/2016_11_29_Breckland_GTAA_Final_Report.pdf)

⁶⁰ See [West Norfolk Gypsy and Traveller Assessment - https://www.west-norfolk.gov.uk/download/downloads/id/2579/gypsy_and_traveller_accommodation_assessment_2016.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/2579/gypsy_and_traveller_accommodation_assessment_2016.pdf)

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.

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 prepared Housing and Economic Land Availability Assessments (HELAAAs) 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. 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 16 – All Norfolk 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 Housing White Paper the Norfolk Authorities have agreed to take a range of actions to improve future housing delivery.

Agreement 17 - 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.**

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 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, single storey dwellings, 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;
- 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.

It should be noted that authorities housing delivery will be measured against the Housing Delivery Test (HDT) and if under 95% - authorities will be required to produce 'Action Plans' to address shortfalls in delivery.

Section 7 – Health

7.1 Introduction

The origins of the planning system are closely associated with wider health improvements and recognise that where people live, work, study and relax play a greater role in health and well-being at a population level than just access to health care. Equally we know that as population size and structure change, for example an aging population, so the demands upon health care facilities increase alongside the ever increasing need to prevent ill health in the first place. These matters are not influenced solely on an individual planning authority basis. Services are arranged and delivered across multiple boundaries. People move between areas to do different things and across their lifetime. Transport routes and methods inevitably impact wide geographic areas.

Health services in Norfolk are provided at geographies which extend beyond district and borough boundaries. The Norfolk and Waveney Clinical Commissioning Group covers the whole of Norfolk and also the former district council area of Waveney (in north-east Suffolk). Public Health provision is provided at the national, regional and local level (subject to recent national changes).

Given that the various healthcare organisations operate across district and borough boundaries it is considered that there is merit in looking at consistent approaches to planning for health and well-being across the Norfolk local planning authorities.

Consequently, the need to co-operate between agencies and across geographies is important.

7.2 Principles

The National Planning Policy Framework (NPPF) requires that ‘planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles’⁶¹. The health and wellbeing of the population, and health infrastructure should be considered in both plan and decision making.

The Planning White Paper (2020 paragraph 1.7) recognises that: “Where we live has a measurable effect on our physical and mental health, on how much we walk, on how many neighbours we know or how tense we feel on the daily journey to work or school. Places affect us from the air that we breathe to our ultimate sense of purpose and wellbeing.”

The TCPA has advocated the impact of good planning decisions through its Reuniting Health with Planning workstream since 2010 and has worked in partnership with NHS England, Public Health England and Sport England.

The review of Health Equity in England by Sir Michael Marmot⁶² highlights the need to build healthy and sustainable communities as one of 6 core recommendations to address the widening health inequalities. It states that ‘since 2010 life expectancy in England has stalled; this has not happened since at least 1900.....health is closely linked to the conditions in which people are born, grow, live, work and age’. There are clear links made to the quality, cost and condition of housing in the report,

⁶¹ NPPF revised Feb 2019, Chapter 8

⁶² See [Health Equity in England - https://www.health.org.uk/funding-and-partnerships/our-partnerships/health-equity-in-england-the-marmot-review-10-years-on](https://www.health.org.uk/funding-and-partnerships/our-partnerships/health-equity-in-england-the-marmot-review-10-years-on)

‘The costs of housing have increased significantly, including social housing, impacting on all the other social determinants of health and pushing many people into poverty, homelessness and ill health.’

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

- Stalling of life and healthy life expectancy rates (in the last decade 2011 onwards)
- Widening health inequalities and likely aggravation of this arising from impacts of Covid-19
- An increasingly ageing population, with impacts on health and social care provision and costs⁶³
- The number of premature deaths increasing, caused by smoking, lack of physical activity, obesity and alcohol misuse.⁶⁴ The UK wide NHS costs attributable to overweight and obesity are projected to be £9.7 billion a year by 2050 with wider costs to society estimated to reach £49.9 billion per year⁶⁵
- Increase in demand for mental health and wellbeing services
- Changing approaches to healthcare delivery.

7.3 Healthy living and Wellbeing – through better design

It is clear that health issues are increasingly important considerations in 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 and blue infrastructure. Availability of suitable and affordable housing and employment opportunities are also critical factors, as is access to active travel opportunities and affordable and practical public transport. It is also likely that, at least in the short to medium term, active consideration will need to be given to increased home working, space standards and overcrowding in homes and internal ventilation.

New developments present an opportunity to build homes, streets and neighbourhoods that support and enable healthy lifestyles through high quality provision of walking, cycling and accessible public transport. Good quality public spaces promote a sense of community and increase the variety of options to interact with the local environment and improve physical and mental health outcomes.

Both new and redesign of existing developments should consider a variety of needs of the Norfolk population. These could include:

- Recognising that greatest health benefits across the population are to be had by encouraging the inactive to be moderately active so build short active journeys in everyday life such as shopping, schooling, catching a bus and work
- Considering the particular needs of an ageing population when designing open space, access to public transport and physically active means of getting about. For example, siting of

⁶³ The King’s Fund: Future Trends, Demography, Ageing Populations

⁶⁴ British Heart Foundation, 2013: Economic costs of physical inactivity.

⁶⁵ Source: Guidance Health Matters: obesity and the food environment March 2017 (Public Health England)

benches and shelters, availability of toilets, safety when sharing pathways, level terrain and the provision of adult outdoor exercise equipment.

- It is important when designing built environments and making blue and green space more widely available that signage, navigation and layout actively consider needs of those, for example, with dementia or learning disabilities who may otherwise find some designs less accessible
- A number of these considerations may also support their use by, for example, adults with younger children, the less mobile across all age groups and those with a sensory disability
- Signage to facilities could be expressed in time taken to walk, for example, instead of distance and routes designed to break up longer journeys into manageable sizes
- Location of housing, employment, education and retail facilities to minimise journeys by non-private vehicle methods
- Where possible cycle lanes and footpaths should be situated away from busy roads, publicised and well sign posted to encourage use. They can provide opportunities for biodiversity enhancement by planting appropriate tree species, hedgerows and pollen and nectar rich flora, facilitating species movement and habitat connectivity.

The RTPI published Enabling Healthy Placemaking⁶⁶ which highlights the barriers to building healthy places⁶⁷ called for 'greater ...collaboration between health, social care, and planning professionals to ensure people's health needs are integrated into the conceptualisation, design and planning stages of new developments in the future'. It highlights 7 ways planners can take the lead:



⁶⁶ [Enabling Healthy Placemaking - https://www.rtpi.org.uk/media/5777/enabling-healthy-placemaking.pdf](https://www.rtpi.org.uk/media/5777/enabling-healthy-placemaking.pdf) published July 2020

⁶⁷ Such as lack of funding; different requirements from developers; conflicting policy priorities.

7.4 Implementing Healthy Design

The NPPF states that local planning authorities should make use of tools and processes for assessing and improving the design of development, specifically recommending assessment frameworks such as Building for Life 12 (recently updated to Building for a Healthier Life⁶⁸).

[Building for a Healthier Life](#) replaced Building for Life 12 in July 2020; published in collaboration with NHS England, NHS Improvement and Homes England. 'Building for a Healthier life' is a Design Code to help people to improve the design of new and growing neighbourhoods and has been created for community, developer and local authority use. The 12 considerations capture areas of design and placemaking that need most attention but are often the most overlooked⁶⁹. It provides visual prompts to good practice rather than the previous 12 question approach.

The [Healthy Streets Approach](#) is a framework that emphasises a street that works for people and is a street that is good for health. It provides an evidence-based approach for creating fairer, sustainable attractive urban spaces. The Department for Transport has funded Healthy Streets Approach training for Local Authorities (including Norfolk) using Local Cycling and Walking Infrastructure Plans. The 10 indicators focus on the experience of people using streets and complements the use of the Building for a Healthier Life design code.

10 Healthy Street Indicators™



Source: Lucy Saunders

⁶⁸ NPPF revised Feb 2019, para 129.

⁶⁹ Building for a Healthier Life, pg 5.

7.5 Health Infrastructure Protocol

To help ensure these issues are addressed a protocol for joint working between planning, public health and health sector organisations was agreed in 2017 and has been revised to take account of the emergence of the NHS Sustainability and Transformation Partnership (STP). Throughout this revision support has come from several quarters, including each of the Norfolk and Waveney Clinical Commissioning Group (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 provides a single point of contact for local planning authorities within the healthcare system for feedback on planning applications and general advice. Working with STP colleagues affords an opportunity for long term planning and growth to be considered alongside health infrastructure needs.

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 modelling data has been used 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 Protocol also includes a *Health Planning Checklist* that consists of six place-making themes. Whilst 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. Additionally there is agreement that within the GNLP area all developments in excess of 500 homes should use a Health Impact assessment. HIA use is to be actively encouraged to tackle health inequalities and the promotion of good health across all areas alongside wider use of both HIAs and the checklist to actively consider designing in health benefits.

The Protocol should be reviewed by the middle of 2022 to take into account the specific health issues in the county; any changes required in the duty to co-operate and other changes currently drafted within the Planning White Paper.

Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.

Section 8 – Climate Change

8.1 Introduction

In Summer 2019 the Norfolk Strategic Planning Member Forum requested that a Climate Change sub group should be set up as part of the update process to the Norfolk Strategic Planning Framework. The group would review information in relation to Climate Change with a specific focus on the role and impact on Local Plans and the planning system generally. It would also explore some of the emerging policy work around climate change, and looks at best practice where applicable..

8.2 Background

Climate change has been embedded into Land Use Planning for many years, significant emphasis is placed on planners to address climate change through achieving sustainable development. It is recognised that considerable national, international and local research in relation to climate change has been completed in recent years. This includes reports by the Intergovernmental Panel on Climate Change, and there continues to be emerging changes in relation to Government policy on the matter.

In June 2019 the government amended the Climate Change Act 2008 to extend the national carbon reduction target within it with the aim to reduce carbon levels to net zero by 2050. In December 2020 the government also announced a new plan which aims for at least a 68% reduction in greenhouse gas emissions by the end of the decade, compared to 1990 levels⁷⁰. Many local authorities were galvanised to either declare climate emergencies, and/or set their own locally applicable targets, either replicating the governments or extending it further as well as enshrining the concept into corporate objectives and Plans.

Within Planning, Local Plans can play a central role in helping to facilitate this key national environmental objective. Effective strategic plan making can deliver sustainable development and help address the challenges that climate change brings, complementing measures outside of the planning sphere but not resolving climate change challenges on its own. Clearly the County is vulnerable to the impacts of climate change through flooding, drought, storm surges, sea rise etc. The costs of climate change are projected nationally to be high and it is emphasised that not taking action could cost more than taking steps to reducing emissions now to avoid the worst impacts of climate change. Sustainable development through land use policies is regarded as a key means of addressing climate change and as such the planning system has a duty to ensure that action is taken to encourage and deliver more sustainable development.

⁷⁰ See [Press Release - https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit](https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit)

8.3 Climate Change Next Steps

Working collaboratively through the Norfolk Strategic Planning Member Forum, Local Planning Authority planning officers, along with colleagues from the Environment Agency, Local Enterprise Partnership and Norfolk County Council, worked together to develop ideas which could help local plans address climate change through land use policies at a strategic level. The group have produced a Climate Change Research Paper and sub topic reports which set out a number of approaches for local authorities to consider when drafting local plans. In the light of this work the following agreement has been reached.

Agreement 19 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to consider to the approaches contained in the NSPF Climate Change research paper when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Furthermore the Planning White Paper strengthens the need for local design initiatives and the work of this climate change group has highlighted that design and best practice climate change guidance could help with both climate change and healthy living initiatives. As such there is a strong case for looking at a Norfolk Design Guide or Charter. It is suggested that the initial steps would be to investigate how this could best be achieved and to what level all authorities are willing to work to a single design guide. It is clear for this to succeed that external and community involvement would be required and we would also need to understand in more detail any proposed changes to the NPPF and legislation, and the existing intentions of each local planning authority with providing further guidance.

A further agreement sets out Local Planning Authorities commitment to investigate the production of a countywide Design Guide:

Agreement 20 – Norfolk Planning Authorities agree to work together to investigate the production of a county wide design guide and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles

The design guide would meet the requirements of the National Design Guide and look at other country wide initiatives like Building for a healthy life. Mitigating for and adapting to climate change could be a key consideration of this guide. Individual Local Planning Authorities could still produce their own guide or they can be produced as part of neighbourhood plans.

Section 9 – 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 and improving air quality as well as reducing the impact on, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- reducing unnecessary car use and supporting the roll out of new technologies (such as Electric Vehicles and alternative fuels eg hydrogen) and alternative methods of transport including 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.

Together these measures will help create healthier more sustainable communities.

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

- promoting development and design which seeks to actively improve health, prevent ill health and tackle widespread health inequalities
- 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.

9.1 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 Norfolk Strategic Infrastructure Delivery Plan⁷¹ (NSIDP) 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

⁷¹See [Norfolk Strategic Infrastructure Delivery Plan - https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies](https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies)

projects in the NSIDP reflect the key infrastructure needed to deliver the scale of growth ambitions outlined in the NSPF. The NSIDP is a working document that will be regularly updated as information becomes available. A new version of the NSIDP was released in November 2020. 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.

9.2 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 11: Priority Utilities Projects for Promotion⁷²

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Attleborough Energy Supply	Not Known	£22m	BRP, NALEP, Private Sector
Broadland Growth Triangle Trunk Sewer	Delivery 2011-2026	TBC	Private sector
Sprowston Primary substation	Not Known	£2.5-10m	Community Infrastructure Levy and private sector
Peachman Way Primary substation	Not Known	£2.5-10m	Community Infrastructure Levy and private sector
Snetterton Heath Energy Supply Long term Requirements	Not Known	TBC	NALEP, Private Sector, BRP
Thetford energy supply (Sustainable Urban Extension)	2021	£6.5m-£9.5m	BRP, NALEP
Thetford energy supply (Thetford Enterprise Park) Phase 1	Not Known	£3m	BRP, NALEP
Thetford energy supply (Thetford Enterprise Park) Phase 2	Not Known	£6.5m	BRP, NALEP
Earlham Substation	Not Known	£2.5-10m	Community Infrastructure Levy and private sector
Cringleford Primary Substation	Not Known	£2.5-10m	Community Infrastructure Levy and private sector

⁷² Anglian Water's Long Term Recycling Plan was published in the summer of 2018. Building on this version work has commenced on the drainage and wastewater managements plans, using a nationally agreed methodology, this will be published in 2022.

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Wymondham water supply connections	Not Known	£22m	Private sector
King's Lynn Sewerage improvements	Not Known	£1.5-1.7m	Community Infrastructure Levy and private sector

The following utilities project have successfully been funded since 2013:

Under construction or part-completed:

- Snetterton Energy Supply - £3.6m
- Thetford Water Supply – £9.8m
- Thetford Sewerage Scheme - £2m
- Easton, Hethersett and Cringleford sewerage upgrade - £11m

Planned, not yet started:

- Increased Surface Water Capacity North Lynn
- Snetterton Energy Supply Short term power needs £6.1m

9.3 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. To support this partners are working with UKPN to ensure there is more detailed information available to authorities providing an understanding of potential constraints and where development will require strategic enhancement of the electricity supply networks. Some Norfolk Planning authorities have also completed electricity infrastructure studies to investigate power supply issues and assess local constraints in more detail, these include the Greater Norwich Energy Infrastructure Study⁷³ and the North Norfolk Power Study⁷⁴.

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.

9.4 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 Current Water Resources Management Plan (WRMP) was published in 2019 and runs to 2045⁷⁵. This is currently under review in parallel to Water Resources East (WRE's) Regional Strategy. This demonstrates how sufficient water for future growth will be provided via a twin-track approach. Anglian Water will focus on the demand side first and reduce the amount of water used by installing smart meters, reducing leakage and investing in water efficiency. But they will also invest in the supply-side to increase the amount of water available. This includes investing in a series of interconnecting pipes to better join up their network and ensure they make best use of available resources before developing new ones. In the medium- to long-term, Anglian Water are likely to need additional resources. This could include winter storage, recirculation of recycled water, or

⁷³ See [Greater Norwich Energy Infrastructure Study - https://gnlp.oc2.uk/docfiles/46/P3723%20Greater%20Norwich%20Energy%20Infrastructure%20Study%20with%20Appendices.pdf](https://gnlp.oc2.uk/docfiles/46/P3723%20Greater%20Norwich%20Energy%20Infrastructure%20Study%20with%20Appendices.pdf)

⁷⁴ See [North Norfolk Power Study - https://www.north-norfolk.gov.uk/media/5583/north-norfolk-power-study-report-march-2019.pdf](https://www.north-norfolk.gov.uk/media/5583/north-norfolk-power-study-report-march-2019.pdf)

⁷⁵ See [Water Resources Management Plan - https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf)

desalination. Anglian Water will be working with regional stakeholders and neighbouring water companies through Water Resources East (WRE) over the next two to three years to identify the best options to take forward to WRMP 2024. The measures undertaken by AW mean that water supply should not be a strategic constraint to development. Essex and Suffolk Water also have a WRMP⁷⁶ for the same period covering the areas of Norfolk they supply.

Norfolk Authorities will work with Water Resources East (WRE) and its members, including the two water companies, to help safeguard a sustainable supply of water for Eastern England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential.

In the period through to September 2023, WRE will develop a draft single, multi-sector Regional Plan for Eastern England, working with water companies, Local Authorities and Local Enterprise Partnerships, the energy and agricultural sectors, landowners and key environmental NGOs and through co-creation, engagement and collective decision making, the plan, and its subsequent iterations, will:

- Increase the level of resilience for water resources for all sectors and the environment.
- Deliver wider benefits in terms of flood risk, river flows and water quality.
- Ensure that water (either too much or not enough) is not a barrier to economic development in the region.
- Identify opportunities and delivery mechanisms to restore and enhance the environment, in line with the biodiversity net gain and wider aspirations of the 25 Year Environment Plan.
- Explore innovative funding and delivery models for water management solutions.
- Promote schemes which represent the best value for the region, seeking through collaboration to deliver more efficient solutions.
- Co-deliver the water related elements of other key regional strategies and plans,
- Focus on delivery of water-related climate change mitigation and adaptation strategies including net zero carbon ambition.
- Provide academically rigorous evidence to policy makers.

As part of WRE's work programme, with the support of councils, the Norfolk Strategic Fund have provided a grant to WRE for the development of a Water Management Strategy for the county. This project will develop short term water-related Covid-19 recovery interventions, the detailed Water Management Strategy and Plan and will establish a partnership structure known as a "Water Fund" to facilitate delivery of nature-based solutions for water management in the medium and long term. This project will be supported by a partnership of Norfolk County Council and [Water Resources East](#), the international environmental charity [The Nature Conservancy](#) (TNC) and Anglian Water.

Water Funds are governance and financing mechanisms allowing public and private sectors to work collectively to secure water for their communities. They are used successfully around the world to leverage blended finance streams to ensure coordinated delivery, funding and monitoring of nature-

⁷⁶ See [Essex and Suffolk Water: Water Resources Management Plan - https://www.nwg.co.uk/globalassets/corporate/reports/esw-final-wrmp19.pdf](https://www.nwg.co.uk/globalassets/corporate/reports/esw-final-wrmp19.pdf)

based solutions (NBS) for water security. In 40 locations, across North America, Latin America, Asia and Africa, TNC collaborates with partners to set up Water Funds based on science-based plans and innovative tools for representing water management challenges, strong monitoring and mobilisation of diverse funding streams. This programme will establish TNC's first Water Fund in Europe. Being part of the global Water Fund network will access collective experience, accelerating the project, and enable Norfolk to be featured as a global exemplar for water resource management, thereby facilitating access to further financial and human resources.

The project will create a new multi-stakeholder governance structure which will include representatives from councils, New Anglia LEP, water companies, environmental organisations and the agri-food and energy sectors. This governance structure will be set up in 2 stages:

- a Water Management Board to generate consensus across all local actors for the preparation of a prioritised plan;
- a more permanent structure (a Water Fund) to: supervise and coordinate implementation of the plan, monitor results, enable mobilisation of funding and repayable financing from public and private sources

Progress with the project will be regularly reported to councils across the county.

Agreement 21– Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Other work is also ongoing across the county considering the wider impacts of water and associated infrastructure. Norwich City Council leads the River Wensum Strategy Partnership, working alongside the Environment Agency, Norfolk County Council, the Broads Authority and Norwich Society. The strategy has the overall vision of breathing new life into the river by enhancing it for the benefit of all and increasing access to, and making greater use of, this important asset. It will consider social, environmental and economic factors in achieving this vision. Some of the projects already delivered or planned as part of this strategy look to improve water quality and reduce flood risk on a catchment wide basis. In addition, the CATCH project, (Norfolk County Council along with Norwich City Council, Broadland District Council and Anglian Water) is working to find long-term solutions to the problem of surface water flooding in Norwich. The pilot project offers homes, businesses and schools the chance to have a slow-release water butts or rain water planters installed completely free of charge. The project is funded by Anglian Water and the Interreg European Union CATCH Climate Change and Flood Reduction Project. The EU are currently considering further phases of project work.

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 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning 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.

Anglian Water's aim is to see residential developers go beyond the optional higher water efficiency standard (110 litres/per person/per day) and in time to move to water neutrality as outlined in their Green Recovery Plan⁷⁷ this could include water re-use measures in new developments including stormwater and rainwater harvesting and grey water recycling forming part of an integrated approach to water management.

The disposal of waste water is addressed by Anglian Water's Water Recycling Long-Term Plan (WRLTP)⁷⁸ which highlights the investment needed over the next 25-years to balance the supply and demand for water recycling. The plan considers risk from growth, climate change, severe drought, and customer behaviours. It promotes sustainable solutions for maintaining reliable and affordable levels of service, and facilitates working in partnership to mitigate flood risk. Developing on the WRLTP Anglian Water are preparing a Drainage and Wastewater Management Plan with Stakeholders to be published in 2022⁷⁹ Anglian Water has also implemented new charging rules setting out a fixed, upfront schedule of fees that they charge for laying mains and pipes that connect new buildings and housing developments to their network⁸⁰. This is a significant step towards ensuring that water companies provide an excellent service to developers of all sizes.

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 produced jointly by most Norfolk authorities⁸¹.

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.

⁷⁷ See [Green Recovery Plan - https://www.anglianwater.co.uk/siteassets/household/about-us/green-recovery-five-point-plan.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/green-recovery-five-point-plan.pdf)

⁷⁸ See [Water recycling long term plan - https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-recycling-long-term-plan/](https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-recycling-long-term-plan/)

⁷⁹ See [Drainage and Wastewater Management Plan - https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-and-wastewater-management-plan/](https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-and-wastewater-management-plan/)

⁸⁰ See [DS charging arrangements - https://www.anglianwater.co.uk/siteassets/developers/development-services/ds-charging-arrangements-2019-2020.pdf](https://www.anglianwater.co.uk/siteassets/developers/development-services/ds-charging-arrangements-2019-2020.pdf)

⁸¹ See [Strategic flood risk assessment - http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra](http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra)

Agreement 23 – 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. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

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 Plan⁸² 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).

9.5 Digital Connectivity

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; 95% of the county's homes and businesses can now access superfast broadband, up from 42% in 2012⁸³.

The Better Broadband for Norfolk (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)). The BBfN Programme signed a third contract during 2019; as a result a further £13 million will be invested to implement Fibre to the Premises for over 10,000 Norfolk properties that do not have access to Superfast broadband. As a result, by spring 2023, Superfast broadband coverage across Norfolk is expected to increase to 97%.

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 R1⁸⁴ 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.

⁸² See [Anglian district river basin management plan - https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan](https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan)

⁸³ See [Local broadband Information Website - http://labs.thinkbroadband.com/local/index.php?area=E10000020](http://labs.thinkbroadband.com/local/index.php?area=E10000020)

⁸⁴ See [Building Regulations R1 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/517789/BR_PDF_AD_R_2016.pdf](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 and Norfolk authorities welcome Openreach's offer to install Fibre to the Premises (FTTP) free of charge to all new housing developments of 20 or more homes and an improved pricing structure all the way down to two homes⁸⁵. However the further rollout of broadband to existing homes cannot be required through any current Local Plan, but the Norfolk authorities are working 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.

Norfolk County Council in conjunction with all Norfolk districts, boroughs, Norwich city, the chamber of commerce, the LEP and other relevant regional groups has secured circa. £8 million in 2019 via the Government's Local Full Fibre Network programme and a further £2m in 2020 from Ministry of Housing, Communities and Local Government. This will provide Fibre to the Premises for over 400 public sector sites, and importantly also offers potential for nearby homes and businesses to access Full Fibre connectivity via a Government Gigabit Voucher Scheme.

The revised NPPF (para 112) highlights the importance of reliable communications infrastructure in economic growth and social well-being and requires policies to set out how high quality digital infrastructure is expected to be delivered, authorities will 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.

As part of the work to update this document a specialist group was set up to provide further guidance to local authorities on supporting broadband in local plans. Also, in March 2020 the Government published its response to the consultation⁸⁶ on: New Build Developments: delivering gigabit-capable **connections** which outlined Government's proposals to mandate gigabit-capable connections in all new build developments. Following publication of the response Government will:

- Amend the Building Regulations 2010 to require all new build developments to have the physical infrastructure to support gigabit-capable connections.
- Amend the Building Regulations 2010 to create a requirement on housing developers to work with network operators so that gigabit broadband is installed in new build developments, up to a cost cap.
- Publish supporting statutory guidance (Approved Documents) as soon as possible.
- Continue to work with network operators to ensure they are connecting as many new build developments as possible and at the lowest possible price.
- Work with housing developers and their representative bodies to raise awareness of these new requirements.

⁸⁵ See [Fibre for developers rate card](https://www.openreach.com/content/dam/openreach/openreach-dam-files/images/fibre-broadband/fibre-for-developers/Rate%20card%20website.pdf) - <https://www.openreach.com/content/dam/openreach/openreach-dam-files/images/fibre-broadband/fibre-for-developers/Rate%20card%20website.pdf>

⁸⁶ [New Build Developments: delivering gigabit-capable connections response](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872990/New_Build_Developments_HMG_consultation_response.pdf) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872990/New_Build_Developments_HMG_consultation_response.pdf

There are no further details on the timetable for the amended regulatory changes but in the meantime Local Planning Authorities can opt to encourage and support high speed broadband provision in new developments by incorporating objectives and policies to support Broadband in local plans and core strategies, as well as referencing the issue in pre-application discussions and adding it to planning application validation lists as a consideration. Local Planning authorities can also ensure they are able to support developers with information regarding the connection of Fibre to the Premises (FTTP) and discuss applications with the County Council to understand how their initiatives can help deliver high speed broadband provision to developments. Local planning authorities can implement Wayleave policies that only seek to cover costs and work with landowners to improve connectivity.

Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high-speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Mobile Connectivity

Mobile telephone connectivity has, like broadband, become increasingly important. Significant change is now underway with the rollout of 5G services now having commenced in the County.

Coverage in Norfolk

Interactive mapping (available from Consumer Group Which⁸⁷) shows the general coverage for 2G, 3G 4G and 5G 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.

Norfolk County Council commissioned AWTG (Advanced Wireless Technology Group) to conduct an independent benchmark assessment of mobile coverage and user experience across Norfolk. The benchmarking campaign was conducted between February and March 2018 using a robust four-tier methodology to maximise the extent and breadth of data collection. This included Walk Testing at over 30 locations including museums, tourist attractions, camping and caravan sites, Rail Testing on all main rail routes in Norfolk, Drive Testing on over 5,500 kilometres of Trunk, A, B and C class roads across Norfolk and Stationary Testing at enterprise zones and 28 Norfolk Broads mooring points. The scope of the campaign covered a detailed assessment of the GSM (2G), UMTS (3G) and LTE (4G) radio network (coverage) performance and received signal strength of the four main mobile network operators in the UK. The results of this assessment can be found at [the Norfolk Mobile Coverage web page - www.norfolk.gov.uk/mobilemap](http://www.norfolk.gov.uk/mobilemap).

⁸⁷ [Which mobile phone coverage map - http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map](http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map)

Nevertheless many mobile “not-spots” remain in Norfolk (some rural areas and parts of the coast in particular), particularly for 4G data coverage, the most significant improvements in rural coverage will be delivered through the Shared Rural Network (SRN) programme. This Programme will see the four main mobile operators and government jointly invest £1bn in improving mobile coverage in rural areas. The target is to deliver 4G coverage to 95% of the UK by 2025. The work started in 2020, initially with £500m investment from the four MNOs to share masts in areas where there is coverage already available from one or more MNO, but not all four. The next stage will entail a further £500m investment from government to fund coverage improvements in areas where there is no existing coverage. Through shared and new infrastructure, the Shared Rural Network is planned to increase the parts of the UK that get 4G coverage from all operators from 66% to 84%, improving consumer choice. The mobile operators expect the Shared Rural Network will extend mobile coverage to an additional 280,000 premises and for people in cars on an additional 16,000km of the UK’s roads, boosting productivity and investment in rural areas. Norfolk local authorities will continue to work proactively and collaboratively with the MNOs and their network build partners to improve mobile phone coverage including fast data services availability over 4G & 5G services.

5G

The next generation of mobile networks will be 5G which 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. Whilst more base stations will be required Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which will be rolled out on existing infrastructure where possible. Getting high quality 5G infrastructure rolled out across Norfolk will be important to delivering the vision of the NSPF. 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 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.

Norfolk authorities are currently working with Mobile UK and the mobile network operators to advance knowledge and plans to ensure that rural areas of Norfolk get 5G as early as possible.

On 22 July 2020 the Government published its response to the joint MHCLG and DCMS consultation published last year on proposed planning reforms to support the deployment of 5G and extend mobile coverage. This included the principle of amending permitted development rights for operators with rights under the Electronic Communications Code and the circumstances in which it would be appropriate to do so.

The government response summarises the submissions received and confirms its intention to take forward the in-principle proposals consulted on. This will be subject to a technical consultation with representatives from both the local planning authority and mobile industry sector, on the detail of the proposals, including for appropriate environmental protections and other safeguards to mitigate the impact of new mobile infrastructure.

This will be undertaken prior to amending Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to enable:

- the deployment of taller and wider masts;
- building-based masts located nearer to highways; and
- faster deployment of radio equipment housing, such as equipment cabinets.

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 approved where they fall outside of the remit of permitted development, 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.

As part of the work to update this document a specialist group was set up to provide further guidance to local authorities on supporting the roll out of 5G. The group have produced a supporting document of Shared Objectives for extending 4G coverage and the rollout of 5G infrastructure in the County of Norfolk.

Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

9.6 Education

Education

Norfolk's School Capacity return to the DfE (SCAP) indicates that Norfolk's school population will begin to stabilise over the next 10 years. The larger cohorts experienced at primary school are now moving through to secondary indicating a rise in secondary numbers over the next 10 years but a drop in primary school numbers. Calculating a 10 year forecast for primary school numbers does come with certain caveats. The calculations are based on the past 3 years of children born, and therefore only produce three years of predicted future data. The 3 years from 2020 are smaller year groups than those from 5 years ago which may explain the predicted drop in primary school numbers.

Primary age population including the influence of housing planned will drop by around 7.2% and secondary will rise by 4.2% (children currently in the school system including the additional 4% covered by growth). The impact of housing included in these figures is based purely on housing with full planning permission and some areas of the County have significant growth planned. Once these new homes come forward the figures are likely to change.

Previously reported increases in the school population at reception age are changing but numbers have been stable over the past 3 years at around 9000 per year group. Secondary school numbers at year 7 are increasing with the higher year groups currently in primary moving through to secondary. 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 83% of schools being graded Good or Outstanding in 2020 compared with 68% 7 years ago – data as at September 2020. 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.

Our strategic priorities were agreed by NCC Cabinet in February 2020 to guide the work with local partners and any proposals for investment in the education infrastructure. Norfolk County Council works closely with Local Planning authorities as per agreement 21.

Agreement 26: Norfolk 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.

9.7 Transportation

There will be a need for considerable further investment in transport infrastructure if this is not to constrain growth. A background paper was previously produced summarising the state of the County's transport network, providing much of the evidence base for the production of the first version of the NSPF and subsequent Local Plans⁸⁸. 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. The information is now being updated via the Norfolk Strategic Infrastructure Delivery Plan as mentioned in Section 9.1.

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.

The following projects have successfully been funded since 2013

Completed:

- Broadland Northway (Norwich Northern Distributor Road (inc Postwick)) - £205m
- Norwich Pedal ways - £14m
- Great Yarmouth Beacon Park Link (A47/143 Link) - £6.8m
- A11 dualling Barton Mills to Thetford- £105m
- Great Yarmouth Right Turn at the rail station - £400,000
- Great Yarmouth Rail Station to the Market Place improvement- £2m
- Great Yarmouth sustainable transport package (Part 1) - £2.5m
- Thetford Enterprise Park Roundabout- £1.5m
- King's Lynn Lynnsport Link Road- £3.5m
- A140 Hempsall Roundabout - £4m
- A11/Outer Ring Road Daniels Road junction improvement- £2m
- Great Yarmouth congestion-busting projects- £3.3m
- Norwich (various projects including Dereham Road roundabout- £2m, Cycle link extension to Wymondham- £1.3m, City centre Prince of Wales Road- £2.6m, Dereham Road widening- £3m)

Under construction or part-completed:

- Attleborough Town Centre Improvements - £4.5m
- Great Yarmouth sustainable transport package (Part 2) - £3.5m

⁸⁸ See [NSPF Supporting Transport Information - https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/NSFTTransport_OutputV4.docx](https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/NSFTTransport_OutputV4.docx)

Planned, not yet started:

- Great Yarmouth Third River Crossing- £120m
- A47 improvements £2-300m (incl Thickthorn and Great Yarmouth junction improvements and dualling Blofield to North Burlingham, and Easton to North Tuddenham)

Norfolk County Council, in partnership with Norwich City Council, Broadland District Council and South Norfolk Council, has made an application to the Department for Transport (DfT) as part of the Transforming Cities Fund. The fund aims to make it easier for people to access jobs, training and retail, and also aims to respond to issues around air quality. In September 2018, Greater Norwich was one of 10 city areas shortlisted to apply for a share of the £840m grant. In September 2020 the DfT confirmed that Norfolk County Council will receive £32 million from the Transforming Cities Fund with a further £27m from bus operator First Eastern Counties, local councils and private contributions⁸⁹.

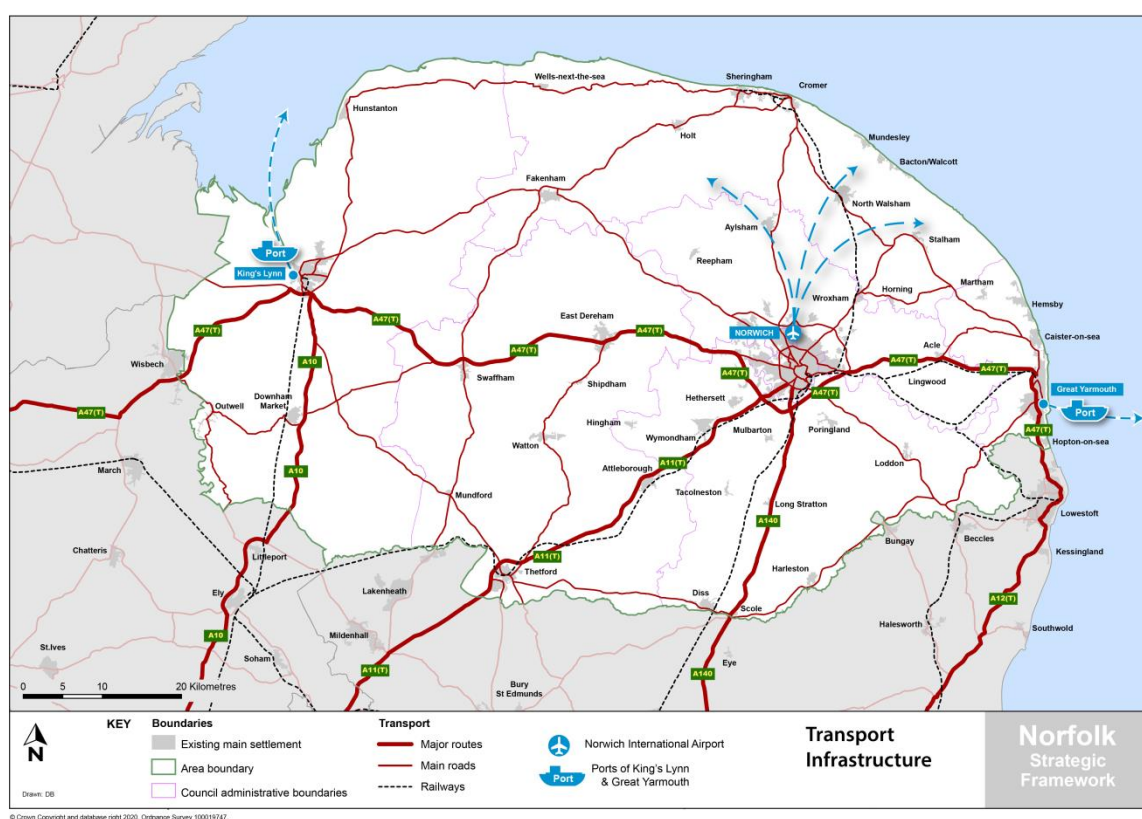


Figure 9: Norfolk Transport Infrastructure, 2021

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. In 2017 the airport published its draft masterplan setting out a vision for the airport's continued growth over the next

⁸⁹See [Councils secure £59 million for sustainable transport - https://www.norfolk.gov.uk/news/2020/09/councils-secure-59-million-for-sustainable-transport](https://www.norfolk.gov.uk/news/2020/09/councils-secure-59-million-for-sustainable-transport)

30 years. The masterplan has been adopted and endorsed by Norwich City Council subject to production of a surface access strategy. Continued endorsement is subject to the surface access strategy being produced however this has been delayed due to covid-19.⁹⁰ The Coronavirus has had a significant impact on air travel however the long term impacts remains unclear, the relevant Local Authorities will work with the airport to support any recovery plans once these are understood.

Great Yarmouth is the largest port in the county. It is a modern, multipurpose facility with 24/7 unrestricted operations, integrating a well-established river port with a fully operational deep water outer harbour with more than 1 km of quayside, accepting vessels up to 220 metres in length and up to 10.5 metres draught at all states of tide.

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 reflecting that many people from these districts work in Norwich and many parts of these districts are too far from Norwich 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.

Tables below lists some of the key road projects that the County Council in collaboration with partners is seeking to progress in the next 10 years.

Table 12: Key Infrastructure Road Projects in Local Authority Control

Project Name	Estimated Start date	Estimated Cost	Funding sources
Broadland Growth Triangle Link Road	2023	£38m	Developer funding, CIL, BRP, HIF
A140 Long Stratton Bypass	2023	£37.5m	Developer funding, NALEP, CIL, NPIF, Government Major Road Network
A10 West Winch Housing Access Road	2024	£30-50m	Developer funding, DfT Major Road Network
A148 Fakenham Roundabout Enhancement	2022	£3.5m	NPIF, NALEP
Attleborough Link Road	TBC	£18m	BRP, developer finance, NALEP, Homes England loan, HIF
Norwich Western Link (A47 to NDR)	2023	Indicative £160m	NALEP, Local Major Transport Scheme

⁹⁰ See [Norwich Airport Masterplan - http://www.norwichairport.co.uk/masterplan/](http://www.norwichairport.co.uk/masterplan/)

Table 13: Priority Road Projects for delivery by other organisations

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
A11 Thetford bypass junctions	2020-2025	Not Known	NPIF, Highways England Roads Investment Strategy 3 (2025-2030), Major Road Network Funding
A47 Wisbech Bypass Junctions	2020	Not Known	NPIF, developer funding, Highways England Roads Investment Strategy 2 (2020-2025), CPCA Business Board Growth Deal Funding
A47 Acle Straight dualling	2025-2030	£79m	Highways England Roads Investment Strategy 3 (2025-2030)
A47 Tilney to East Winch Dualling	2025-2030	£130m	Highways England Roads Investment Strategy 3 (2025-2030)

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 need for further development of Norfolk's infrastructure is very welcome because of its contribution to the delivery of the objectives of the NSPF there remains a considerable need for further infrastructure investment in the County if the vision in this framework is to be realised.

Furthermore, the background paper previously 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.

Rail

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.

There are two lines from London: the Great Eastern Main Line from London Liverpool Street via Ipswich to Norwich; and the Fensline / Great Northern Route from London King's Cross via Cambridge to King's Lynn. (King's Lynn also has one train per day to London Liverpool Street). Norwich is directly connected to Cambridge, Great Yarmouth, Lowestoft and Sheringham; and longer distance services to Liverpool via Peterborough.

The tables below set out some key shared priority schemes for rail improvement that the authorities will work together to promote for funding. These include Norwich in 90 which requires track improvements including the Trowse swing bridge, Haughley Junction, loops in Essex and level crossing upgrades. Also a large number of rail services pass through Ely. Major rail infrastructure improvements are required to accommodate all services committed within franchise agreements and for further frequency improvements in the future. Local authorities are working with local enterprise partnerships, government and Network Rail to bring forward the improvements for delivery in the next round of rail spending, between 2019 and 2024, known as Control Period 6.

Table 14: Priority Rail Projects for promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Norwich to London rail (Norwich in 90)	2019-2024	Being evaluated	Network Rail Control Period 6
Great Yarmouth Rail Station	2019-2024	TBC	Network Rail Control Period 6
Ely area enhancements	Mid 2020's	TBC	Network Rail Control Period 6, NALP
Broadland Business Park station	Mid 2020s	£6.5 million	Growth Deal, Rail Industry
East West Rail (Cambridge to Oxford)	Late 2020s	Not Known	Government via special purpose delivery vehicle

9.8 Coastal and Marine Planning

The Norfolk coast is of recreational, environmental, economic and cultural importance but it is also home to industry (energy, ports and logistics, digital, food and drink and creative sector), agriculture and tourism.

Coastal Partnership East

Officially launched on 10th June 2016, Coastal Partnership East brings together the coastal management expertise from three local authorities (Great Yarmouth Borough Council, North Norfolk District Council, and East Suffolk Council) these face significant, diverse but also common challenges of a dynamic coastline.

Coastal Partnership East is responsible for 92km of the 173km of coastline in Norfolk and Suffolk, from Holkham in North Norfolk to Landguard Point in Felixstowe. There are approximately 352,000 people who live in the direct coastal zone and many more that work on and visit our coast.

Shoreline Management Plans

The East Anglia Coastal Group's role is to influence and support members to manage the coast for the benefit of the Anglian Region, this role includes supporting the Shoreline Management Plans Process. Shoreline Management Plans (SMPs) are non-statutory plans for coastal defence management planning prepared by the Environment Agency. The aim of an SMP is to provide a strategy for managing flood and erosion risk for a particular stretch of coastline, they provide a large-scale assessment of the risks associated with coastal processes and helps reduce these risks to people and the developed, historic and natural environments.

The SMPs provide estimates of how the coast is likely to change over the next 100 years, taking into account the future implementation of coastal policies, geology, likely impacts of climate change and the existing condition of the coast including coastal defences.

Three Shoreline Management Plans are active along the Norfolk coastal frontage:

- SMP4 the Wash Shoreline Management Plan covers approximately 110 km of coast from Gibraltar Point to Old Hunstanton.
- SMP5 which incorporates the coast to the west of Kelling Hard.
- SMP6 which incorporates the coast to the east of Kelling Hard to Lowestoft Ness.

Shoreline Management Plans exist around all of the coastline of England and Wales.

Marine Plans

The East Inshore and East Offshore Marine Plans have been prepared by the Marine Management Organisation (MMO) and were adopted in April 2014. The East Inshore Marine Plan area includes the coastline stretching from Flamborough Head to Felixstowe, extending from mean high water out to 12 nautical miles, including inland areas such as the Broads and other waters subject to tidal influence, and covers an area of 6,000 square kilometres. The East Offshore Marine Plan area covers the marine area from 12 nautical miles out to the maritime borders with the Netherlands, Belgium and France, a total of approximately 49,000 square kilometres of sea.

The aim of marine plans is to help ensure the sustainable development of the marine area. Marine plans will contribute to economic growth in a way that benefits society whilst respecting the needs of local communities and protecting the marine ecosystem. They will help to reduce the net regulatory burden on applicants and users by acting as an enabling mechanism for those seeking to undertake activities or development in the future and providing more certainty about where

activities could best take place. The MMO is responsible for preparing marine plans for the English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. For Norfolk The East Inshore Marine Plan area extends up to Norwich on the River Yare, as well as to Wroxham on the River Bure, and to near Ellingham on the River Waveney and in West Norfolk the River Great Ouse and River Nene are tidal and so the East Inshore Marine Plan area, extends beyond the Borough boundary almost to Peterborough on the Nene and just beyond Earith on the Great Ouse.

The MMO are consulted as part of the local plan process for authorities with coastal borders or where tidal rivers are part of their area. The MMO are also involved with a range of local coastal groups and strategies.

Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues:

- Infrastructure
- Governance
- Heritage
- Marine Protected areas
- Marine and coastal employment
- Sustainable port development
- Energy – offshore wind and oil and gas
- Access for tourism and recreation
- Sustainable fisheries and aquaculture in small harbour towns
- AONB and Seascape and landscape (character and natural beauty)
- Biodiversity
- Marine aggregates
- Cabling
- Water quality/water supply and sewerage
- Climate change/ Coastal erosion and coastal change management

9.9 Flood Management and Green Infrastructure

Flood Management

Flood risk is an important 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. The three main settlements in the County which all developed in their locations due in part to their access to tidal waters can all be impacted by flooding.

Much of the Norfolk coastline is reliant on flood defences to reduce 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 NSIDP. In addition to that an interactive Environment Agency Map can be accessed at [the EA web page - https://environment.data.gov.uk/asset-management/index.html](https://environment.data.gov.uk/asset-management/index.html) which details managed flood risk assets and planned capital schemes. 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 including the opportunities not only for mitigation but also adaptation. Flood risk assessments are to be used effectively to ensure development is located appropriately and away from areas of flood risk wherever possible. Developers will need to work closely with the relevant risk management authorities in minimising flood risk from all sources through a combination of high quality urban design, natural flood risk management including green infrastructure, as well as use of Sustainable Drainage Systems (SUDs) which can provide multi-functional benefits not limited to flood risk and can form part of an integrated approach to water management with water re-use measures 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. Anglian Water's Water Smart Communities⁹¹ combine different elements of water management together with town planning and design to deliver multiple benefits for communities and the environment. They use a more holistic and integrated approach to urban water management, with the aim to:

- Enhance liveability by contributing to green streetscapes and high quality open space
- Promote sustainable use of water resources and infrastructure to enable growth
- Build resilience against the potential impacts of climate change and extreme weather events
- Contribute to natural capital and biodiversity through multi-functional water features
- Deliver water efficient homes to reduce household bills and support affordability

Anglian Water together with the LLFAs (including Norfolk County Council) have also created a Water Management Checklist⁹² for Local Plan policies.

⁹¹ See [Water smart Communities - https://prod-swd.anglianwater.co.uk/siteassets/household/about-us/aws-water-smart-communities---flyer.pdf](https://prod-swd.anglianwater.co.uk/siteassets/household/about-us/aws-water-smart-communities---flyer.pdf)

⁹² See [AW water management checklist - https://www.anglianwater.co.uk/siteassets/household/about-us/water-management-checklist-for-local-policies.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/water-management-checklist-for-local-policies.pdf)

Further guidance on how this will be done is available on the County Council website in its role as the Lead Local Flood Authority for the County⁹³. The Government has also set out the National Flood and Coastal Erosion Risk Management Strategy for England⁹⁴. This strategy's long-term vision is for a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100. It has 3 long-term ambitions, underpinned by evidence about future risk and investment needs. They are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action

The Local Flood Risk Management Strategy (LFRMS) for Norfolk must be consistent with the National FCERM Strategy. The LFRMS is in the process of being updated to include policies for zero emissions and environmental net gain in local flood risk activities and supporting communities to be more flood resilient.

⁹³ See in particular [Lead Local Flood Authority Information - 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](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)

⁹⁴ See [National Flood and Coastal Erosion Risk Management Strategy for England - https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2](https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2)

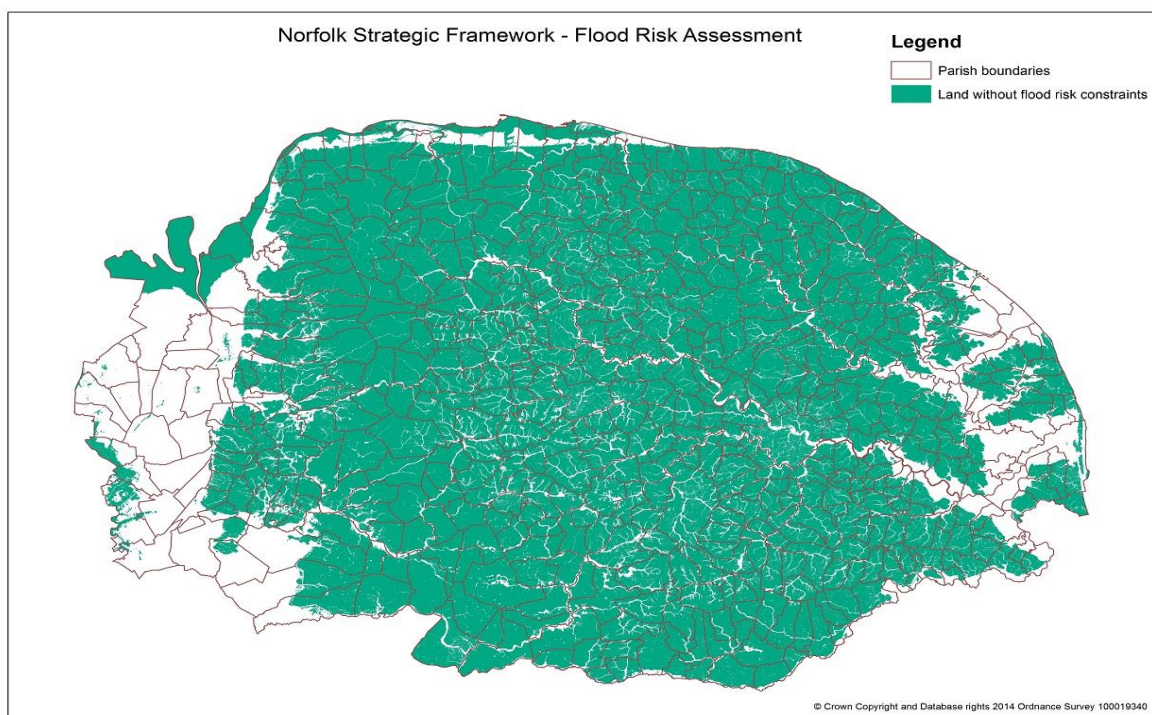


Figure 10: Norfolk Flood Risk Map. 2016

Figure 10 provides an illustration, at a broad scale, of the extent of land with and without flood risk constraints from rivers and the sea in Norfolk. 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 to new development and consideration of on-site and off-site flood risk. If planned correctly and measures for betterment are agreed and implemented, 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, this includes the completion on the £19.3m Bacton Walcott Sandscaping scheme. Further projects are detailed in Local Plans, coastal management plans and strategic flood risk assessments and included in the county wide NSIDP.

Table 15: Priority Strategic Flood Defence Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Great Yarmouth Tidal Defences (Epoch 2)	Commenced Oct 2019	£40.3 million	NALEP, Local Authorities and Private Sector
Great Yarmouth Tidal Defences (Epoch 3)	mid 2023	£29.5 million	NALEP, Local Authorities and Private Sector
Future Fens – Flood Risk Management	2030	Phase 2 £10-15m	Central Government, Local Government, Internal Drainage Boards and other funding sources from beneficiaries.

Green Infrastructure and the Environment

Green infrastructure (GI)⁹⁵ 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.

⁹⁵ [The definition of GI is set out in the Natural England document GI Guidance - http://publications.naturalengland.org.uk/file/94026](http://publications.naturalengland.org.uk/file/94026) , in terms of the NSPF it includes 'blue infrastructure' ie water environments - rivers, lakes, ponds etc.

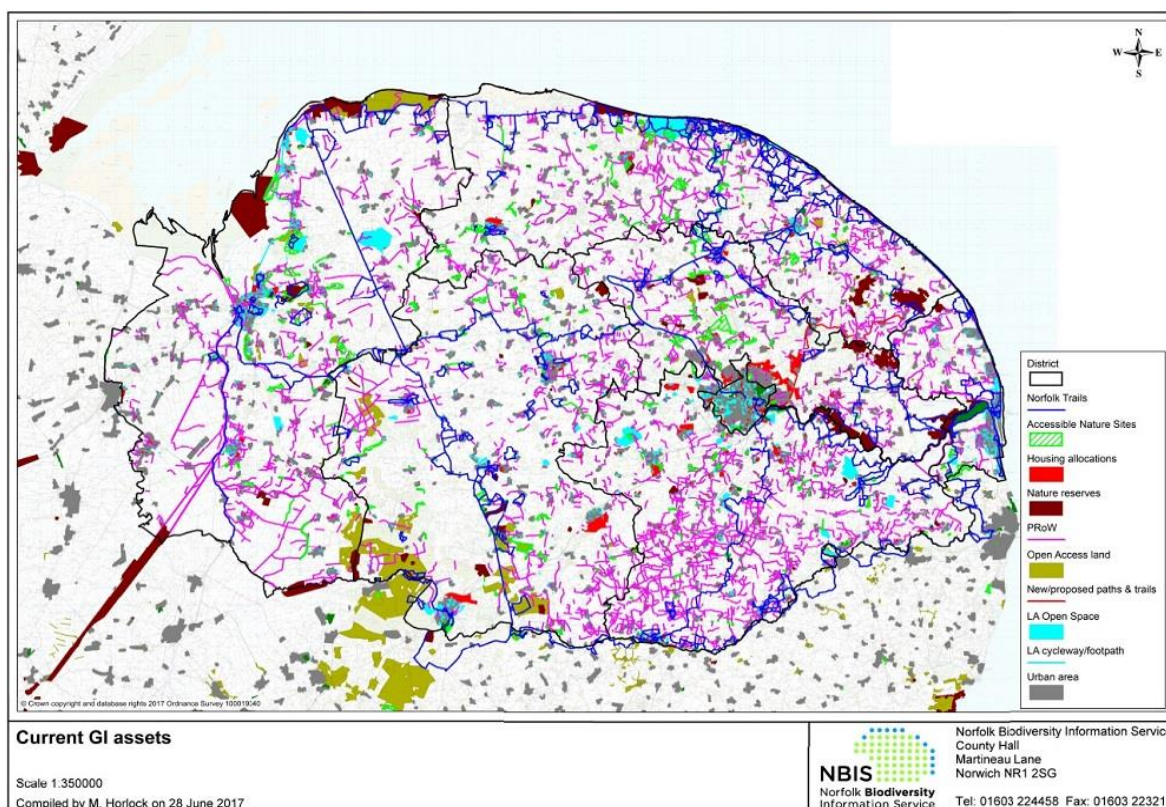


Figure 11: Norfolk's current GI assets. 2017

Current GI assets are set out in Figure 11⁹⁶. 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)

With the anticipated introduction of the Environment Bill in January 2021, legally binding targets for Biodiversity Net Gain and Local Nature Recovery Networks will support the vision of the 25 year Environment Plan and the GI Network work will form an important foundation for this.

⁹⁶ Further more detailed maps are available from the NBIS website see <http://www.nbis.org.uk/sites/default/files/documents/Maps.zip>

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;
- Creating more or restoring lost wildlife rich habitat outside protected site networks to reverse the loss of biodiversity
- 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.

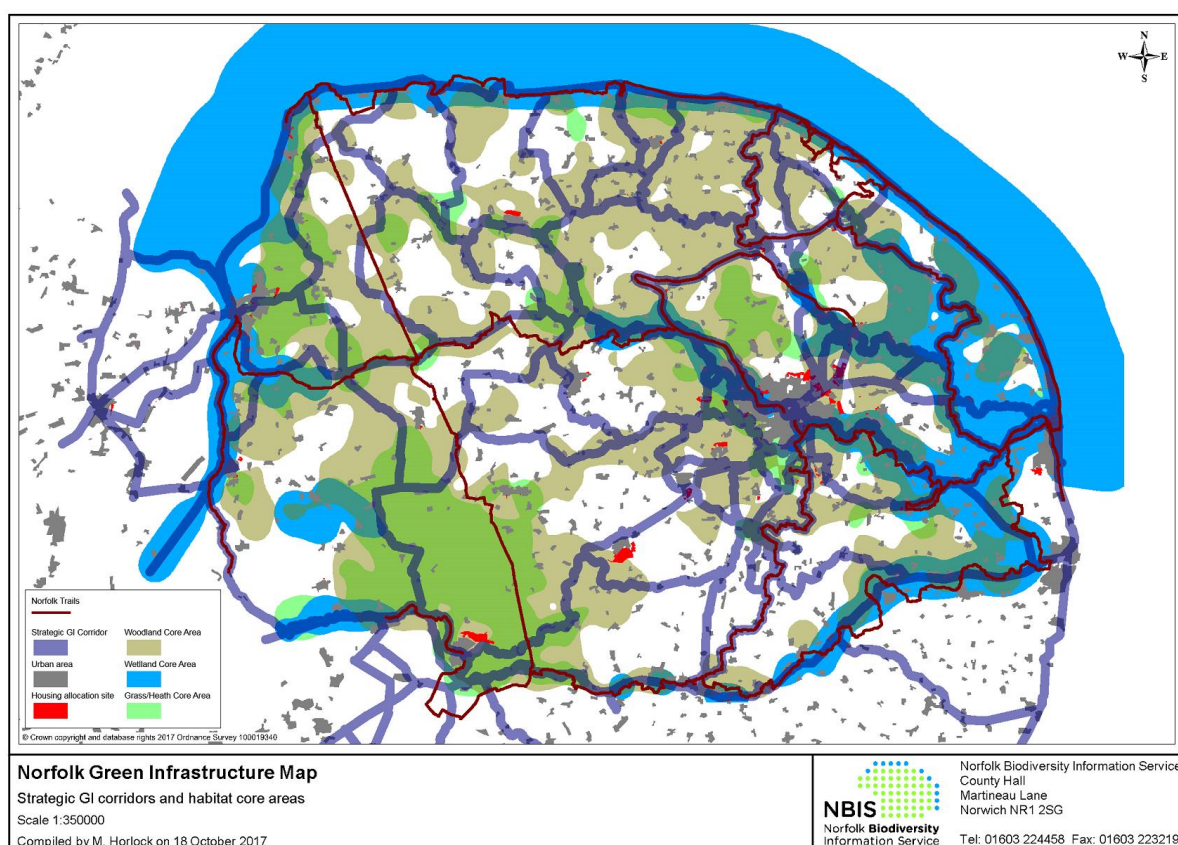


Figure 12: Norfolk's GI corridors. 2017

Figure 12 shows the identified potential Green Infrastructure Corridors. The intention is for this map to inform Local Plans, and also local GI Strategies. 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 not only 'protect, maintain and enhance biodiversity' but also to restore and create habitats which support 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 e.g. North Norfolk Coast, The Broads and the Brecks, 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.

As part of producing this Framework the authorities are working to produce, in collaboration with the Environment Agency, Natural England, Wild Anglia, Forestry Commission and other local partners, the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy. This is an action plan which looks to address the recreational pressures on Natura 2000 protected sites in a coordinated way and therefore helps address requirements arising from Habitat Regulations Assessments from respective Local Plans. The Strategy includes:

- A Recreational Impact Avoidance and Mitigation Strategy (RAMs) - a County Wide programme of mitigation measures to avoid adverse effects on protected habitat sites from the in-combination recreational impacts from new residential development. The cost of measures is proposed to be funded by a tariff on new residential development.
- Identification of GI opportunities which aims to divert visitors from sensitive habitat sites

Agreement 28: 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

Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy 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 feature within the SNIDP.

Table 16: 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	£5.7m	S106, CIL, DfT, NALEP, Interreg Experience-secured
Weavers Way	2023	£3.1m	RDPE,HLF,NALEP
North West Woodlands Country Park	Ongoing	£2m	BDC, CIL, BRP
Burlingham Country Park	2021	TBC	CIL, BRP, NCC, Developer Funding

9.10 Minerals and Waste

Minerals

Carstone is a type of sandstone that is quarried in west Norfolk. It has traditionally been used as a vernacular building material, although it is no longer used to any significant degree. Although it is classed as a 'hard rock' it is not used as a hard rock (e.g. road dressing), instead it is used primarily as fill (to raise the levels of land prior to construction) or in the formation of embankments. Therefore it is often used in the construction of roads.

Carstone deposits are located in very limited areas of west Norfolk. In 2019 there were two carstone extraction sites in Norfolk, located at Middleton and Snettisham.

Carstone production in Norfolk was 39,878 tonnes in 2019. The 10 year rolling average of carstone sales was 75,380 tonnes in the period 2010-2019. The 3 year rolling average of carstone sales was 81,245 tonnes in the period 2017-2019. The permitted reserves for carstone extraction sites in Norfolk were 1.72 million tonnes at the end of 2019. Based on the 10 year sales average, at the end of 2019 there was a carstone landbank of permitted reserves of over 22 years.

Silica sand deposits are located in very limited areas of west Norfolk, a relatively narrow band which runs north to south just to the east of King's Lynn. The northern extent of the silica sand resource is at Heacham, and the southern extent around Hilgay. In Norfolk the silica sand resource is split into two broad categories, the Mintlyn Beds and the Leziate Beds; historically the Leziate Beds have been used principally for glass sand and the Mintlyn Beds for the production of foundry sand. Processing of sand for foundry use has stopped at Leziate and those parts of the process plant dedicated to their production have been removed. This reflects a general decline in the demand for foundry sand in England.

The deposit which is being worked at Leziate is one of two in England where silica sand of sufficient purity and grade for the manufacture of colourless flint (container) and float (window) glass is extracted. The other extraction site of silica sand of comparable quality is in Surrey.

Silica sand which is to be used for glass manufacture requires a significant amount of processing prior to being suitable for onward shipment to the glass manufacturers. This processing requires large and capital intensive plant such as the one operated by Sibelco UK Ltd which is located at Leziate. Consistency of material is an important consideration and this requires blending of sand from different areas of the working. The processing plant site includes a rail head to export the processed mineral for use by glass manufactures elsewhere. Norfolk is one of the most important sources of silica sand in Great Britain, accounting for approximately 16 per cent of total silica sand production and 58 per cent of glass sand production in Great Britain in 2018.

Due to the cost and largely fixed nature of the processing plant and railhead, silica sand working has historically taken place in close proximity to the Leziate processing plant. However, this now means that the most accessible areas have either been worked or are in the process of being worked.

The 10 year rolling average of silica sand sales in Norfolk was 780,700 tonnes in the period 2010-2019. The 3 year rolling average of silica sand sales was 854,100 tonnes in the period 2017-2019. The permitted reserves for silica sand extraction sites in Norfolk were 3.181 million tonnes at the end of 2019. Based on the 10 year sales average, at the end of 2019 there was a silica sand landbank of permitted reserves of over 4 years.

Sand and gravel resources are located throughout the County (with the exception of the Fens area in the far west and south-west of Norfolk). Sand and gravel is used in the construction of roads and buildings and it is a key ingredient in the production of concrete and mortar, asphalt coating for roads, as a drainage medium and in the construction of embankments and foundations. The distribution of sand and gravel sites throughout Norfolk is widespread with a relatively large number of small operators. In 2019 there were 25 permitted sand and gravel extraction sites in Norfolk operated by 14 different companies. There are, however, particular clusters of sand and gravel workings near to King's Lynn, in the north of Breckland District and around Norwich.

Sand and gravel production in Norfolk was 1.329 million tonnes in 2019. The 10 year rolling average of sand and gravel sales was 1.356 million tonnes in the period 2010-2019. The 3 year rolling average of sand and gravel sales was 1.48 million tonnes in the period 2017-2019. The permitted reserves for sand and gravel extraction sites in Norfolk were 13.52 million tonnes at the end of 2019. Based on the 10 year sales average, at the end of 2019 there was a sand and gravel landbank of permitted reserves of over 9 years.

Secondary and recycled aggregates are also sourced within Norfolk. The annual average quantity of inert and construction/demolition waste recovered at waste management facilities over the ten years from 2009-2018 was 412,100 tonnes, however, some parts of this waste stream are unsuitable for use as a recycled aggregate (such as soil or timber). The data is not comprehensive because many operations, such as on-site recovery, are not recorded.

Marine aggregate dredging is carried out by companies on behalf of the Crown Estate and the sites are licensed by The Crown Estate and the MMO. Aggregates from marine dredging are not currently received at any ports or wharves in Norfolk. A total of less than 500 tonnes of marine sourced aggregates was consumed in Norfolk in 2014 (the most recently available date), this represents such a small percentage of the total aggregates used in Norfolk that no adjustments have been made to the mineral requirement figures in the Norfolk Minerals and Waste Local Plan based on marine sourced aggregates. Norfolk County Council does not determine planning applications for marine aggregates and they do not form part of the Minerals and Waste Local Plan.

Clay and chalk are also extracted in Norfolk. Clay is primarily used in the engineering of landfill sites and in flood protection schemes. Chalk is primarily used as a liming agent for farmland. In 2019 there was one active clay working at Middleton, and three active chalk workings located at Castle Acre, Caister St Edmund and Hillington. However, the resource for these minerals is considered to be abundant in Norfolk relative to the demand.

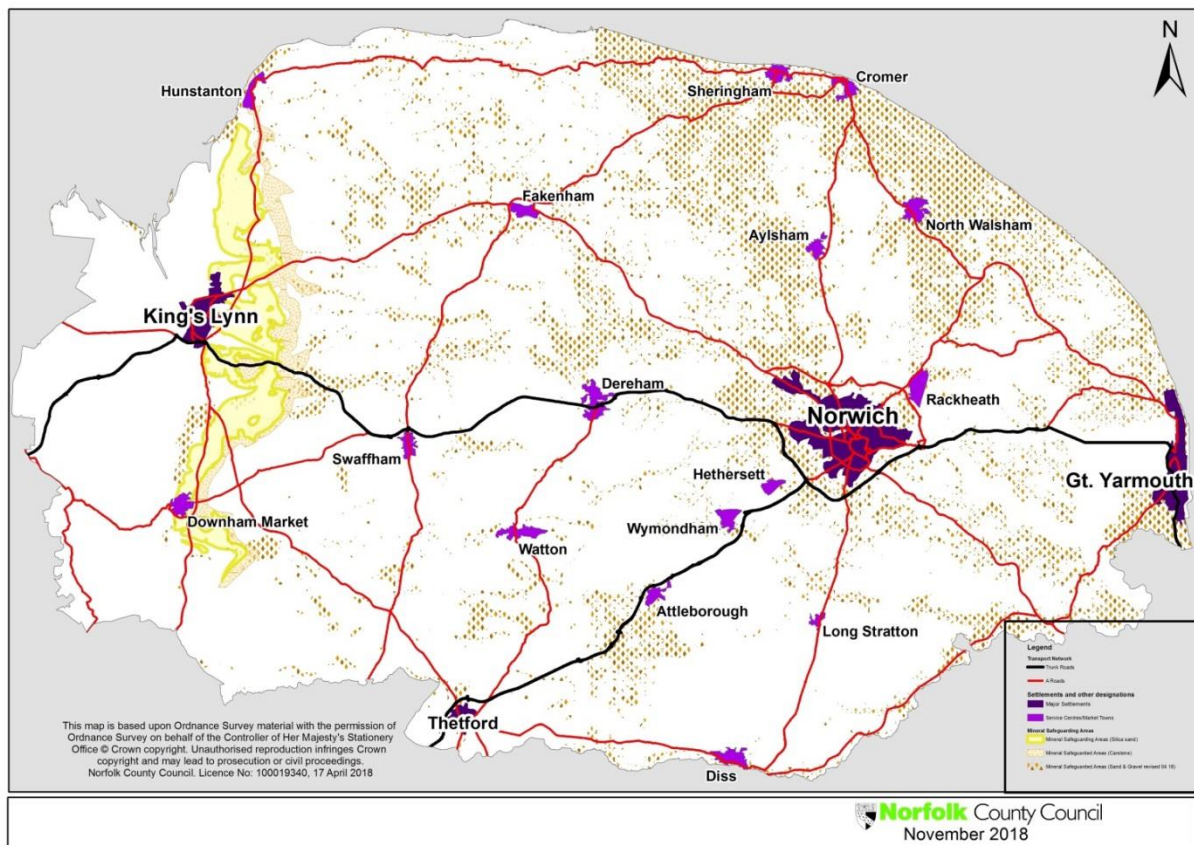


Figure 13: Mineral Resources within Norfolk

Waste

There are a number of waste management facilities within Norfolk. They include:

20 Household Waste Recycling Centres, provided by Norfolk County Council, which accepted nearly 67,000 tonnes of waste in 2018/19.

7 commercial composting facilities which received nearly over 107,000 tonnes of waste in 2018/19, as well as a few small community composting facilities;

There are two metal recycling facilities at Lenwade and Great Yarmouth, one metal recycling facility at King's Lynn docks and a large number of small sites accepting scrap metal or end-of life vehicles. The metal recycling facilities received nearly 192,000 tonnes of waste in 2018/19;

58 operational sites for the treatment and/or transfer of waste (including municipal, commercial and industrial, hazardous, clinical, construction and demolition), which received over 1,746,000 tonnes of waste in 2018/19 and 24 sites for the treatment and transfer of inert waste (including construction and demolition waste) only, which received over 260,000 tonnes of waste in 2018/19;

There are two non-hazardous landfill sites (Blackborough End and Feltwell) in Norfolk. Feltwell landfill site has not received any waste since 2012; it is required to be restored by 2041. Blackborough End landfill site did not receive any waste for disposal for nearly four years, during 2016 to 2019, but it started receiving waste again in 2020. Blackborough End landfill site is required to be restored by the end of 2026. These two sites have a permitted void capacity (remaining landfill space) for non-hazardous waste estimated to be 1.534 million cubic metres, plus capacity for 3.5

million tonnes of inert waste disposal. In 2018/19 over 260,000 tonnes of inert waste was received at inert landfill sites or used in the restoration of mineral workings.

There is a renewable energy plant operated by EPR at Thetford which received over 666,600 tonnes of waste in 2018/19. The waste received at this facility is poultry litter which is burned to produce energy.

Agreement 29 :

It is agreed that:

- 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand.**
- 2) A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand.**
- 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development.**
- 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy.**
- 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period.**
- 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns. Priority for the location of new waste management facilities will be given to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.**
- 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.**

Section 10 – Conclusions and Next Steps

This Framework documents how the Norfolk Planning Authorities maintain effective cooperation between themselves, with the neighbouring district and county planning authorities, and with other key relevant agencies and utilities. In doing so it meets the relevant requirements of Section 3 of the 2019 National Planning Policy Framework (NPPF).

As referred to in section one of this document the government has announced a consultation on landmark reforms to the planning system under the Planning for the Future White Paper⁹⁷ which includes the proposed change to abolish the Duty to Cooperate. Once further clarification is provided by central government through new legislation and a revised National Planning Policy Framework it will become clear if Norfolk Planning Authorities can continue to address strategic planning matters through a revision of this document.

However Norfolk Planning Authorities recognise the benefits of joint working beyond the Duty to Cooperate and will maintain the following agreement:

Agreement 30 In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

There remains significant value in continuing with a work programme into the next financial year to address strategic cross boundary issues going forward.

As part of the proposed joint planning activity Norfolk Planning Authorities have agreed to undertake the following programme of work:

- **Investigate the production of a Norfolk Design Guide/Charter** - The white paper strengthens the need for local design initiatives and the work of the NSPF completed this year has highlighted that design guidance could help with both climate change and healthy living initiatives. The initial steps would be to investigate how this could best be achieved and to what level all authorities are willing to work to a single design guide.
- **Develop an implementation programme for a county wide RAMS tariff** and Enhanced Green Infrastructure Study - Subject to the approval of all Norfolk authorities to the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy there will be a requirement to implement and start collection of the new RAMS Tariff. The report and Natural England also recommend that further work is also carried out to undertake an enhanced Green Infrastructure audit and this should highlight appropriate measure in areas of deficiency.
- **Review of the Norfolk HELAA Methodology** - The County wide Housing and Economic Land Availability Assessment Methodology is now nearly 5 years old and based on the 2012 version of the NPPF. Norfolk Local Planning authorities have agreed to review this in light of any new requirements from a revised NPPF.

⁹⁷ See [the planning for the future consultation - https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system](https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system)

- **Review of the health protocol** – as highlighted in section 7
- **Review of new evidence requirements to support the production of future local plans** - whilst the White paper lacks much detail, it is likely that evidence in a number of areas will need to be created or updated to support the production of local plans.
- **Possible Requirements to update this document** - Once further clarification is provided by central government through new legislation and a revised NPPF it will become clearer if Norfolk Local Planning Authorities can continue to address strategic planning matters through a revision to the NSPF.

There also remains other significant benefits to continue with the current strategic planning activities completed under this remit, these included:

- Maintaining links to other neighbouring counties and their strategic planning work.
- Maintain links to public bodies and Utilities involved in the preparation of local plans eg Natural England, Environment Agency, Anglian Water, MMO, and UKPN.
- Maintain links to other key initiatives in the county eg Water Resources East, Hydrogen East, Greater South East Energy Hub
- Support the county in the production of a county wide Infrastructure Delivery Plan and any potential economic or growth strategies
- Support of Local Plan processes across the county
- Maintain links to NHS estates and the CCG with regular meetings to share updates on key developments and progress of Local Plans
- Scope to continue to commission joint studies across the county to reduce costs

The current NPPF also sets out the requirement for local authorities to prepare and maintain one or more statements of common ground. This document is intended to meet this requirement in a single document for all matters relevant to all Norfolk Local Authorities. Additionally individual local authorities may seek to enter into further statements of common ground with neighbouring or other authorities to address further strategic planning issues as part of the local plan preparation process.

Agreement 31: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.

Appendix 1 – NSPF Contacts:

Please direct all representations relating to the NSPF to the NSPF Project Manager as detailed below. Use the Local Planning Authority contact details only if you have enquiries concerning a specific authority area.

NSPF Programme Manager	
Trevor Wiggett City Hall St Peter's Street Norwich NR2 1NH Email: trevorwiggett@norwich.gov.uk	
Breckland Council	Broadland and South Norfolk Councils
Andrew Darcey Planning Policy Manager Breckland Council and South Holland Council Elizabeth House, Walpole Loke Dereham NR19 1EE Tel 07901873599 Email : Andrew.Darcey@breckland.gov.uk	Paul Harris Place Shaping Manager Broadland District Council Thorpe Lodge 1 Yarmouth Road Norwich NR70DU Tel 01603 430444 Email : paul.harris@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	Sam Hubbard Strategic Planning Manager Great Yarmouth Borough Council Town Hall, Hall Plain Great Yarmouth Norfolk NR30 2QF Tel 01493 846624 Email: sam.hubbard@great-yarmouth.gov.uk
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	Stephen Faulkner Principal Planner Norfolk County Council Martineau Ln Norwich NR1 2UA Tel 01603 222752 Email : stephen.faulker@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	Judith Davison Planning Policy Team Leader City Hall St Peter's Street Norwich NR2 1NH Mail : judithdavison@norwich.gov.uk Tel 01603 989314

Appendix 2 – Cross Border Cooperation Initiatives

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
Coastal Partnership East	North Norfolk, Great Yarmouth, East Suffolk	Shared Coastal Management Team for the four authorities.	Ongoing	Coastal Zone Planning Statement of Common Ground (2018), setting out an agreed approach to coastal planning (<u>note</u> additional signatories to Statement: Broads Authority, BC King's Lynn & West Norfolk; and endorsed by Environment Agency).	<u>Coastal Partnership East Website - https://www.coasteast.org.uk/</u>
Membership of Broads Authority	Broadland, Great Yarmouth, North Norfolk, Norwich, South Norfolk, East Suffolk, Norfolk and Suffolk.	Each provides members to govern the Broads Authority.	Ongoing		<u>Membership of Broads Authority - http://www.broads-authority.gov.uk/about-us/who-we-are/members/meet-our-members</u>
East Suffolk/Great Yarmouth sub regional meetings	East Suffolk, Great Yarmouth, Broads Authority.	Quarterly Periodic meetings between these three eastern authorities to discuss strategic cross boundary issues pertinent to the area.	Ongoing	East Suffolk Local Plan Duty to Cooperate Statement of Common Ground (2018) on Housing Market Area, Functional Economic Area and Objectively Assessed Need, between East Suffolk, Great Yarmouth, Broads Authority, South Norfolk, Suffolk Coastal, and Mid-Suffolk.	n/a
Norfolk Coast (AONB) Partnership	Great Yarmouth, North Norfolk, King's Lynn & West Norfolk, Norfolk, Broads Authority, Natural England	Management of the Norfolk Coast Area of Outstanding Natural Beauty.	Ongoing	The Partnership also includes 2 community representatives.	<u>Norfolk Coast (AONB) Partnership website - http://www.norfolkcoastaonb.org.uk/partnership/core-management-group/169</u>
Memorandum of Understanding – Treatment of Housing and Employment Needs	Broads Authority, Broadland, South Norfolk, Norwich, Great Yarmouth, East	Agreed mechanism for distribution of housing (and employment) development in relation to targets for	2014 (and previously)	Further Statement of Common Ground (2017) between Broads Authority and Great Yarmouth Borough Council updating and	n/a

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
and Delivery in the Broads Authority Area	Suffolk, Norfolk, Suffolk.	overlapping district and Broads areas.		specifying this in relation to housing in Proposed Broads Local Plan	
New Anglia Local Enterprise Partnership	All Norfolk and Suffolk District and County Councils	To lead economic growth and job creation across Norfolk and Suffolk.	Ongoing	Partnership also includes private sector and education representatives.	New Anglia Local Enterprise Partnership website - https://newanglia.co.uk/
Wherry Line Community Rail Partnership	Norfolk, Suffolk, Norwich, Broadland, Great Yarmouth, East Suffolk.	To promote the railway and the surrounding area to develop economic and environmental benefits for residents, visitors and tourists.	Ongoing	Partnership also includes Abellio Greater Anglia, Network Rail, Railfuture, Norfolk Association of Local Councils, rail users, station adopters, RSPB, and local businesses.	Greater Anglia Community partnerships - https://www.greateranglia.co.uk/about-us/community-rail-partnerships
Great Yarmouth Transport and Infrastructure Steering Group	Great Yarmouth, Norfolk, Environment Agency, Highways England	To promote and coordinate infrastructure improvements in, around and benefitting Great Yarmouth Borough	Ongoing		Great Yarmouth Transport and Infrastructure Steering Group - https://great-yarmouth.cmis.uk.com/great-yarmouth/Committees/CommitteeSystemfromMay2016/tabid/142/ctl/ViewCMIS_CommitteeDetails/mid/562/id/170/Default.aspx
A47 Alliance	Norfolk, Great Yarmouth, Broadland, Norwich, Breckland, King's Lynn & West Norfolk, Broads Authority	Seeks to promote the dualling of the A47.		Alliance also includes Peterborough & Cambridgeshire local authorities, MPs, business groups, LEs, etc.	A47 Alliance website - http://www.a47alliance.co.uk/
Greater Norwich Development Partnership	Norwich, Broadland, South Norfolk, Norfolk County Council and the Broads Authority	Partnership to produce Local Plan for Greater Norwich Area and address related planning policy issues such as housing land supply and monitoring. This involves a member level group and joint officer team.	Ongoing		Greater Norwich website - http://www.greaternorwichgrowth.org.uk/
Greater Norwich Growth Board	Norwich, Broadland, South Norfolk, Norfolk County Council and the Broads Authority	Member level Board and joint officer team for strategic investment planning and delivery across the Greater Norwich area. This includes pooling of CIL receipts and a joint CIL process.	Ongoing		Greater Norwich website - http://www.greaternorwichgrowth.org.uk/

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
Norfolk Strategic Planning Officers Group	All Norfolk Local Planning Authorities	Monthly meeting of Heads of Planning Policy teams to discuss cross boundary issues.	Ongoing		Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf
Norfolk Member Forum	All Norfolk Local Planning Authorities	Over sees Duty to Cooperate requirements at a member level, in particular the production of the NSPF.	Ongoing		Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf
Norfolk Strategic Planning Framework	All Norfolk Local Planning Authorities	Shows how the Authorities work together and forms the Statement of Common Ground for the area. Addresses cross boundary issues.	Reviewed for 2021.		Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf
The Wash and North Norfolk Marine Partnership	East Linsey, Boston, Fenland, South Holland, Kings Lynn & West Norfolk, North Norfolk, Lincolnshire County Council and Norfolk County Council	Local Communities and Management Groups working together to protect marine heritage	On-going	Many other Agencies and local groups involved	The Wash and North Norfolk Marine Partnership website - https://wnnmp.co.uk/home/partnerships/
Norfolk/Suffolk Cross border Meeting	Babergh and Mid Suffolk, South Norfolk, Great Yarmouth, Broads Authority, Ipswich Borough, Suffolk County, West Suffolk, Breckland, Kings Lynn & West Norfolk, East Suffolk	Quarterly meetings of Planning Policy teams to discuss cross boundary issues.	Ongoing		
Wisbech Access Strategy Steering Group	Kings Lynn & West Norfolk, Norfolk County Council, Cambridgeshire County Council,		Ongoing		

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
	Fenland DC, Wisbech Town Council				
Norfolk Rail Group	Norfolk & Suffolk County Councils, all districts		Ongoing		
Joint SFRA Update	Kings Lynn & West Norfolk, North Norfolk DC, Greater Norwich, Broads Authority, Great Yarmouth	Team over was the production of a Joint SFRA across most of Norfolk	Completed		
East of England Aggregates Working Party	Norfolk, Suffolk, Essex, Hertfordshire and Cambridgeshire County Councils. Peterborough, Thurrock, Southend-on-Sea, Luton, Bedford, Central Bedfordshire Councils	Quarterly meetings. Collect data relating to the supply and demand of aggregates, publish an annual monitoring report, provides technical advice to Mineral Planning Authorities on their Local Aggregate Assessments. Line of communication between MPAs and MHCLG.	Ongoing	The EoEAWP also includes representatives from the minerals industry, Marine Management Organisation, and MHCLG. Includes feedback and liaison with London AWP and South East AWP.	East of England Aggregates Working Party web page - http://www.centralbedfordshire.gov.uk/planning/minerals-waste/aggregate/overview.aspx
East of England Waste Technical Advisory Body	Norfolk, Suffolk, Essex, Hertfordshire and Cambridgeshire County Councils. Peterborough, Thurrock, Southend-on-Sea, Luton, Bedford, Central Bedfordshire Councils	Quarterly meetings. Forum for discussion relating to waste planning including waste data, capacities and forecasting.	Ongoing	The EoEWTAB is also attended by the Environment Agency. Includes feedback and liaison with London WTAB and South East WTAB.	

Climate Change and the Planning System

1. Introduction

In summer 2019 the Norfolk Strategic Planning Member Forum requested that a Climate Change sub group should be set up as part of the update process to the Norfolk Strategic Planning Framework. The group would review information in relation to Climate Change with a specific focus on the role of and impact on Local Plans and the planning system generally. It would also explore some of the emerging policy work around climate change, and look at best practice where applicable.

Working collaboratively through the Norfolk Strategic Planning Member Forum, Local Planning Authority officers, along with colleagues from the Environment Agency, Local Enterprise Partnership and Norfolk County Council, worked together to research and investigate how measures identified through this research could help inform local plans in order to address some of the impacts of climate change through land use policies at a strategic level.

It should be noted at the outset that planning's role is one of facilitation through mitigation, adaptation and resilience. Although there is a statutory duty to address climate change in the National Planning Policy Framework, the planning system cannot address climate change alone. The subject is broad and cross cutting with impacts ranging from biodiversity to carbon reduction, energy efficiency and supply, settlement distribution, investment choices, technical change and innovation and consumer choice. Addressing Climate change is a shared responsibility. Planning can set out a strategic framework and lay down challenges but delivery through planning requires partnership work, political buy in and effective coherent and consistent approaches through investment strategies as well as legislation and regulatory change. Furthermore, it should be noted that planning can only really affect and influence schemes that need planning permission from the time the policies are in place. Many more buildings are in place now than will be permitted over the coming years.

2. Background

Climate change has been embedded into Land Use Planning for many years; significant emphasis is placed on planners to address climate change through achieving sustainable development. It is recognised that considerable national, international and local research in relation to climate change has been completed in recent years. This includes reports by the Intergovernmental Panel on Climate Change, and there continues to be emerging changes in relation to Government policy on the matter. As a result of this there are already measures incorporated into most local plans to support the impacts of climate change and measures to reduce carbon emissions.

In June 2019 the government amended the Climate Change Act 2008 to extend the national carbon reduction target within it with the aim to reduce carbon levels to net zero by 2050. Nationally many local authorities have either declared climate emergencies, and/or set their own locally applicable targets, replicating the government's or extending it further, as well as enshrining the concept into corporate objectives and plans.

Within Planning, Local Plans can play a central role in helping to facilitate this key national environmental objective. Effective strategic plan making can help deliver sustainable development and help address the challenges that climate change brings, complementing measures outside of the planning sphere but not resolving climate change challenges on its own. Clearly the County is vulnerable to the impacts of climate change from rising sea levels to changing weather patterns. The costs of climate change are projected nationally to be high and it is emphasised that not taking action could cost more than taking steps to reducing emissions now to avoid the worst impacts of climate change in the future. Sustainable development through land use policies is regarded as a key means of addressing climate change and as such the planning system has a duty to ensure that action is taken to encourage and deliver more sustainable development.

Planning for sustainable development need not only cover mitigating and adapting to climate change, it can also help set a framework and assist in changing attitudes and perceptions. Another aspect is that of sequestration of greenhouse gases to reduce the amount in the atmosphere. Local Plans can encourage more sustainable development from the small scale (e.g. improving energy efficiency of dwellings so as to reduce carbon emissions and encourage the transition to cleaner energy, ensuring water is used effectively), to the strategic (e.g. encouraging the sustainable distribution of growth, increasing accessibility and reducing the reliance on carbon emissions from private and public transport).

Mitigating climate change through land use planning by addressing the causes of climate change can be achieved in a number of ways:

- Locating development as near to existing key services and facilities as possible.
- Delivering decentralised energy supplies and promoting its use in existing buildings.
- Supporting the delivery of low carbon and renewable energy.
- Ensuring new development is as energy efficient as possible.

Adapting to climate change addresses consequences and can include:

- Delivering on site sustainable drainage systems.
- Reducing water consumption.
- Adopting precautionary approaches to areas liable to flooding and at risk from coastal change.
- Ensuring that the design of buildings helps them remain cool in summer and warm in winter.

All of the above will demand innovative approaches, and lead to new technology and changes in the landscape and historic buildings which will undoubtedly challenge traditional opinions and views.

As well as ensuring development proposals will mitigate and adapt to the impacts of climate change, Local Plans should reflect the local authorities' overarching aims in building up resilience to climate change and managing long term risk. Action on climate change should be an integral part of the culture of plan-making and should be embedded and integrated in policy preparation. Local Plans are however not a panacea; their focus remains on land use and policy approaches are subject to legal and soundness tests, viability and test of reasonableness that are applied as material considerations at both plan making and decision-making stages. Local Plans also tend to mostly relate to new development that needs planning permission – much development is already in place and some schemes do not need planning permission.

Local Planning Authorities are therefore likely to need to evaluate planning applications through a climate change lens and ensure future local plans clearly set out the decision-making framework, with particular emphasis on the following, for example:

- Placing more emphasis on co-locating uses and planning development near public transport links to reduce car travel.
- Setting more ambitious targets on energy efficiency in buildings.
- Encouraging the greater use of renewable energy.
- Embedding and prioritising climate change in local plan-making and when determining planning applications, including ensuring resilience to climate impacts such as flooding.
- Requiring travel plans with increased sustainable transport obligations - prioritising walking, cycling and public transport over reliance on the car.
- Increasingly plan and help facilitate for the switch to electrified transport.

It is however recognised that each local authority has its own particular circumstances, decisions and actions and these will need to be tailored to local circumstances. However, more co-ordinated efforts are needed where there is a need to follow agreed principles so that future planning decisions are consistently made.

In future years addressing climate change will need to remain a high priority for the planning system if national emission targets are to be achieved. This, though, will be at a time of increasing pressures brought upon LPA's through target driven approaches and increasing deregulation of the planning system and other legislative changes, including the potential for wholesale reform and wider Council devolution.

This report, and the supporting papers, provides some of the tools to enable planning teams to consider how best to embed climate change within the planning system, in advance of any systemic changes that will come through as part of the radical review of the planning system, currently underway.

3. Planning White Paper

It should be noted that at the time of writing this paper, the Government had consulted on fundamental changes to the planning system. One particular relevant proposed change, is that development management policies may be centralised and set at a National level. There are also potential standards for energy efficiency of buildings and electric vehicle charging points that could be set nationally over the coming years.

That being said, the timeline for implementing the final proposals is not known. It will involve redrafting of legislation and changes to the NPPF which could take some time. So, whilst changes may well be made to the planning system in future, recommendations within the report are relevant for the current local plans in production and could be 'in the meantime' policy approaches – in place until the national system is changed.

4. Other benefits of addressing climate change

It is important to be aware that whilst these recommendations relating to topic areas may address climate change adaptation and mitigation, or sequestration of greenhouse gases, that is not the only benefit. It is often wise to do what is recommended, regardless of climate change, because of the many other benefits of which doing so brings. The elements of climate change are also woven into many policy areas with much cross-over, e.g. growth distribution, transport policies, environmental policies as well as specific policies on adaptation and mitigation as all have a role to play in addressing Climate change.

For example:

- Walking and cycling rather than driving a motor vehicle can reduce greenhouse gas emissions from burning fuel. Adopting a more active lifestyle can lead to improved health and well-being as well as saving individuals money.
- An energy efficient home requires less energy and therefore reduces the amount of emissions associated with producing energy, but it also reduces money a household or business spends on energy bills.
- Green infrastructure can help sequester carbon dioxide but it can also help biodiversity and increase access to the countryside and other greenspaces, which can in turn support mental and physical well-being.
- Tackling climate change is part of facilitating and enabling clean growth. It can help economic recovery and provide job opportunities such as retrofitting of properties, technology development e.g., EVs and electrification of transport and the renewable energy sector.

5. Conclusions

5.1 County Wide Agreements

The conclusions of this work are set out in this section. The group proposes that the Norfolk Strategic Planning Framework should include a new agreement which sets out Local Planning Authorities' commitment to address climate change as follows:

Recommendation 1:

Local Planning Authorities in Norfolk agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, Local Authorities agree to consider the evidence contained in the NSPF Climate Change research Paper when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Local Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Each Local Authority can choose to take actions further than suggested depending on local needs or circumstances.

The Planning White Paper strengthens the need for local design initiatives and the work of this climate change group has highlighted that design guidance could help with both climate change and healthy living initiatives. As such there is a strong case for looking at a Norfolk Design Guide or Charter to underpin much of the recommendations that follow. It is suggested that the initial steps would be to investigate how this could best be achieved and to what level all authorities are willing to work to a single design guide. It is clear that for this to succeed that external and community involvement would be required, as well as exploration of how a county design guide would work in practice with local and national guides for decision makers. There would be the need to understand in more detail any forthcoming proposed changes to the NPPF and legislation. In addition, any existing, or planned, intentions of each local planning authority, will need to be factored in to assist formulate further guidance. It is important to note that Local Planning Authorities could still produce their own design guidance; this county-wide guide or charter would not preclude or prevent that. Indeed, such topic areas as vernacular and aesthetics may well be best addressed by individual Local Planning Authorities.

The group propose that the Norfolk Strategic Planning Framework should include a further new agreement which sets out Local Planning Authorities' commitment to investigate the production of a countywide Design Guide:

Recommendation 2:

Norfolk Local Planning Authorities agree to work together to investigate the production of a county wide design guide and produce a brief/scope for this work. This work could help facilitate climate change and healthy living initiatives across the county by providing high-level principles.

The design guide would meet the requirements of the National Design Guide and look at other country wide initiatives like Building for a Healthy Life. Mitigating for and adapting to climate change could be a key consideration of this guide. Individual Local Planning Authorities could still produce their own guide or they can be produced as part of neighbourhood plans.

The research produced a number of topic-based papers, the conclusions of which can be summarised as below, a summary of each of the paper's key points is attached in Appendix A – Key points from Supporting Documentation.

5.2 Energy efficiency

Construction Standards

- Local Planning Authorities could consider a policy around the use of the energy hierarchy – reduce energy need in the first place (design and orientation of development), energy efficiency and conservation, and then maximise use of sustainable energy (for example non fossil fuel based alternatives) and local energy networks. Local Planning Authorities could consider the use of energy statements to explain and justify the approach taken by developers.
- Local Planning Authorities could consider providing a percentage reduction against Part L of the 2013 Building Regulations (amended 2016). This percentage would need to reflect local viability and would be a 'meanwhile' policy approach prior to any national standard.
- Local Planning Authorities can explore the use of policies which require applicants to demonstrate how climate change has been taken into account in a scheme, this could include applications applying for an increase in floor space.
- For major schemes, whether building developments or transport schemes, Local Planning Authorities could specify the achievement of British Standard 'PAS 2080 – Carbon Management in Infrastructure Verification'.

Non-Residential Development

- Local Planning Authorities could explore the use of BREEAM for non-residential development and aim for a standard that is appropriate for their area in terms of viability and the achievability of this standard.

Community-led renewable heat and energy networks/schemes

- Individual LPAs may consider allocating sites for community heating and consider where it could be appropriate for the support of community heating schemes.

Embodied Energy in Buildings

- Local Planning Authorities should have regard to the Historic England's guidance for adapting historic buildings to reduce carbon footprint.
- When appropriate policies are being reviewed, consider if any conversion policies or similar, set a stance that, subject to PD rights, the presumption is in favour of retention of a building. To allow the demolition of buildings, policies should require thorough justification for such an approach.

Light Pollution

- Local Plans can consider dedicated light pollution policies where appropriate, perhaps using some of the approaches taken by those areas with dark skies.

Modern Methods of Construction (MMC)

- MMC¹ could be considered for incorporation into design codes/guides of Local Plans within Norfolk where appropriate, and Local authorities can consider closer working with developers of larger schemes to adopt MMC as a key element, as these sites are built out.

5.3 Environmental

Integrated Constructed Wetlands

- Local Plans could promote the use of integrated constructed wetlands as a way of treating wastewater and acknowledge the multiple benefits such an approach will bring.

Peat²

- Norfolk Local Planning Authorities could investigate the presence of peat in their area. If peat is prevalent, then it is suggested that they consider peat when allocating sites and address peat in relevant policies. There could also be potential for non-site specific policies relating to peat, if it is prevalent. Such policies could seek to reduce the amount of peat excavated and require excavated peat to be disposed of in a way that prevents carbon being released.

5.4 Reducing unnecessary car use and supporting the roll out of new technologies

Reduced/car free developments

- For sites proposed for development in the centre of sustainable settlements with good provision of public transport, consideration could be given to proposals for car free developments or developments with reduced parking.

Walking and Cycling

- Local Planning authorities could consider seeking enhanced walking and cycle connectivity when considering planning applications or providing pre-application advice. The consideration is particularly important for windfall sites which will not have been scrutinised as part of the local plan process. Local planning authorities should consider the following through appropriate plans, policies and processes:
 - Better alignment of plans and decisions with identified local and national strategic infrastructure priorities for walking and cycling.
 - Ensure proposals seek enhanced connectivity to open space and seek to provide connections to, enhancement and maintenance of nearby existing walking and cycling networks.
 - Working with the Highway Authority to establish better provision for active forms of travel.
 - Consider simple, safe and convenient access to and from surrounding local facilities.
 - Consider guiding design principles for walking and cycle connectivity.
 - Engaging with specialists at plan-making, pre-application and planning application stages, particularly on larger planning applications.
 - Consider the use of the principles promoted by Sustrans:
 - Safety – space, users, speed
 - Directness – destination convenience
 - Coherence – part of a wider network, signed & navigable

¹ For example modular build (buildings that are prefabricated off site that meet or exceed modern energy efficiency standards)

² Peat holds much carbon dioxide which is emitted to the atmosphere when it is dried out. So if excavated and disposed of poorly, peat can change from a carbon sink to a carbon source.

- Comfort – accessible and attractive to a wide range of users
- Attractiveness – design, lighting/quiet areas
- Consider requiring a walking & cycling strategy for all major development
- Ensure secure, well located cycle parking for all communal/shared buildings
- Securing funds for maintenance of the existing walking and cycling network (or new/expanded) or supporting infrastructure from new development where appropriate

Live-Work and working from home

- Consideration could be given in Local Plans for the support of live-work units where they meet other local planning policies and subject to appropriate controls (i.e. Removal of PD rights). This would allow acceptable live-work units where there is demand.
- It is also suggested that policies encourage provision of flexible space in new dwellings (both new build and conversion) which could be utilised as home working facilities.

Electric Vehicles

- Local Planning Authorities could consider setting standards in relation to the provision of electric vehicles charging infrastructure. Any standards would be in place until either a national standard is set by the Government, and/or linked to any reviewed parking standards produced by Norfolk County Council, as the Highways Authority. However, in the first instance the LPAs could agree an approach for off-street parking provision – commercial and domestic. Local Planning Authorities can also consider the following:
 - Having an appropriate provision for standard charging of EVs at home and work locations this would be a minimum provision of 7kW /32 amps power capacity.
 - Parking standards - location and design of EV bays have to be considered from the planning stage to maximise the number of cars that can be served by the same charging point, and ensuring that due provision is made to provide safe connectivity to the equipment.
 - On-street charging provision could be designed into the street scene as part of the design and construction process. There is difficulty and cost in retrofitting such provision.
 - Future proofing - develop short term solutions through preparing the site for future technology installations.

Travel plans and Public Transport

- Local Plans could make due reference to the need to support sustainable and active travel on new developments through the production and delivery of Travel Plans as referenced in National Planning Policy Framework Section 9 paragraph 102. Countywide guidance on this can be found here: <https://www.norfolk.gov.uk/rubbish-recycling-and-planning/planning-applications/highway-guidance-for-development/travel-plans>
- Local Authorities can ensure that the necessary infrastructure to support the provision of public transport is agreed early and encapsulated in the Transport Assessment/Agreement. In addition, appropriate behaviour change measures can be captured in the Travel Plan for a site to support the uptake of any public transport service. Where Travel Plans accompany a planning application, they could be produced in consultation with NCC Travel Plan Officers

Appendix A – Summary of Key points from Supporting Documentation

Walking and cycling

- The aim is to better promote active forms of travel, particularly walking and cycling to reduce unnecessary car use.
- Evidence clearly points to shorter trips (i.e. 1-5 miles) where walking and cycling can most effectively increase, and conversely reduce, travel by private car.
- There needs to be a much more joined up approach, with more collaboration and clear advice on how to realise the multiple aspirations.

Consideration of using BREEAM assessments in planning policies for non-residential development.

- BREEAM is a sustainability assessment method for master planning projects, infrastructure and buildings.
- It recognises and reflects the value in higher performing assets across the built environment lifecycle, from new construction to in-use and refurbishment.
- Ratings available are: Pass, Good, Very Good, Excellent, Outstanding.
- It is not uncommon for LPAs to set different ratings based on floor area and/or unit number although development size should have less of an influence over the potential rating which can be achieved than say viability/development need and local priority.

Design of new build dwellings - energy

- Homes – both new and existing – account for 20% of greenhouse gas emissions in the UK
- The Government consulted on (at the end of 2019) a Future Homes Standard
- Some Local Plans in Norfolk are under production and it may be appropriate to have a policy relating to energy usage of homes – a ‘meanwhile’ policy, whilst waiting for the new national standard/approach.

Improving the energy use of existing housing stock.

- Dwellings/buildings that are already in place (around 29 million homes) will not necessarily be affected or have their energy use addressed as a result of policies in Local Plans/national policies.
- We will not meet our targets for emissions reduction without near complete decarbonisation of the housing stock.
- The General Permitted Development Order (GPDO 2015) Part 14 – Renewable energy already enables a range of installations related to renewable energy (subject to conditions).
- But retrofitting measures is much more costly than designing them in from the start.
- Building Regulations and Central Government schemes are predominantly the vehicles for change to the existing housing stock.
- There is little scope within the current planning policy framework to require renovation of or upgrade to existing housing stock in local planning policies.

Car Free Housing policies

- Transport is now the biggest contributor to carbon emissions in the UK and within this sector, passenger cars are by far the biggest contributor.
- It is clear from the Department for Transport's research that a modal shift away from the private passenger car would have the most significant impact in reducing greenhouse gases, such an approach could be encouraged through planning policy
- Norwich City Council and the Borough Council of King's Lynn and West Norfolk have adopted local plan policies that promote car free schemes, subject to location and other criteria.

Live-work units and working from home

- Live-work units are living accommodation specifically designed to allow you to both live and work within the same unit.
- Home working is where a person carries out part or all of their paid work from home as opposed to a central office.
- Improved technical infrastructure to support home working

Community led renewable heat and energy networks/schemes

- These schemes tend to be retrofitted to existing communities.
- Do not seem to need a specific policy approach as generic energy policies seem to be adequate.
- Local Plans could support such approaches.

Communal heat and energy networks/schemes

- This needs to be planned in from the start, can be for cooling and heating and hot water and is usually for larger schemes of over 100.
- Often called District Heating networks or Community heating networks
- Again, the generic renewable/low carbon energy policy will provide general support with other policies assessing impacts on any constraints in the site.
- There could be scope to add a requirement to site-specific policies for larger scale development.

Electric Vehicles (EVs)

- EVs represent a small, but growing vehicle market share, set against a back-drop of declining sales of internal combustion engine-based vehicles.
- The issue of how far an electric vehicle can go on a single charge and the related issue of where to charge the vehicle when on a journey and how long that charging would take are important considerations in the purchase of EVs. However, government statistics suggest that the overriding public concern is lack of charging infrastructure.
- The UK Government has shown commitment to facilitating the mass-market uptake of EVs through a number of recently published strategies and action plans. This is imperative to facilitate the roll out of charging infrastructure.
- There is a need to apply policy for promoting the wider uptake of EVs and from 2030 solely ICE (Internal Combustion Engine) vehicles will no longer be sold in addition to setting minimum standard that ensure that any new schemes are future-proofed to incorporate improvements and innovations as they develop. The Government may introduce regulations or requirements at

a national level in due course. So, any Local Plan requirement would be in place until national policy or regulations 'take over'.

- Uptake of EVs in Norfolk should be assessed to determine whether supply of provision meets demand.

Public transport

- The use of public transport over single occupancy car use is an important part of any Climate change initiative. New development will result in additional needs for new residents and it is important that they have access to a good public transport service, this will also benefit existing local residents.
- Smaller developments will have a limited ability to support public transport but should still consider access to public transport and their suitability will be assessed as part of the work to produce a Housing and Economic Land Availability Assessment (HELAA).

Travel Plans

- The delivery of a travel plan is the result of a transport assessment with developers, with the aim of promoting public transport, walking and cycling, and reducing the need to travel in cars.
- The primary purpose of a Travel Plan (on new developments) is to encourage active travel and healthier lifestyles by the promotion of sustainable travel options, such as walking and cycling, and to reduce unnecessary car use.

Embodied Energy in Buildings- Existing Housing Stock conversions and extensions

- Embodied energy is the energy consumed by all of the processes associated with the production of a building such as the mining and processing of natural resources and transport and building of the building.
- Effectively there are three areas. The first relates to historic buildings, the second relates to upgrading a building that is being extended and the third relates to demolishing buildings.
- In relation to historic buildings, there is Historic England guidance that could be incorporated into Local Plans.
- In relation to extensions, there are examples of where policies require a 10% improvement to the energy use of the existing building.
- Another area to consider is that of **demolition**:
 - On occasion, developers demolish buildings to make way for new buildings.
 - Of course, some buildings can reasonably be beyond use, but sometimes they can be re-used.
 - From September 2020, a new Class ZA Permitted Development Right will be in place, for the demolition of some buildings and replacement by either a single purpose-built detached block of flats, or a purpose-built detached house.
 - Much of the research points to the fact that refurbishment is far better than demolition with regards greenhouse gas emissions. But the planning relaxation around demolition and the VAT implications for refurbishing older properties seems to support demolition over refurbishment.

Light pollution

- Light pollution contributes towards climate change by the destruction of nitrate radicals which cleanse our air and only work in the dark and through the wasting of electricity through unnecessary lighting e.g., leaving office lights on overnight.
- Whilst Local Plans tend to refer to light pollution, it is related more to amenity impacts.
- Some areas that protect their dark skies have stronger dark sky/light pollution policies.

Larger industrial installations/premises

- There are some industrial installations in Norfolk that are identified as significant emitters of greenhouse gases.
- There could be scope to require a reduction in the greenhouse gas emissions of the existing operation as part of any scheme seeking planning permission. There could be site-specific policies for these sites. There may be other sites that could be included in the list.

Modern Methods of Construction (MMC)

- 'Modern Methods of Construction' (MMC) is a broad term, embracing a range of offsite manufacturing and onsite techniques that provide alternatives to traditional house building, but can speed up the building process and produce energy efficient buildings as a result, such as those exemplified by Passivhaus standards of efficiency.
- Offsite manufacture (characterised by modular and pre-fabricated construction) represents an opportunity to address many issues associated with on-site construction methods, in addition to increasing capacity and investment in the industry.
- Whilst increasing the take up of MMC may lie with the construction industry and the Government, Local Plans could seek the use of MMC.

Strong/prominent climate change objectives in the Sustainability Appraisal and Local Plan

- Vision and objectives of the Local Plan are what the policies of the Local Plan are based upon.
- These policies are then assessed against sustainability appraisal objectives whereby potential positives are maximised and any negative effects identified mitigated.

Integrated Constructed Wetlands

- Integrated constructed wetlands or ICWs are a type of sustainable wastewater treatment system that looks and functions like a natural wetland.
- Integrated Constructed Wetlands cleanse wastewater by replicating processes that occurs in natural wetlands.
- Integrated wetlands to deal with waste contribute to greater biodiversity net gain.
- The plants in the wetland reduce N2O and CH4 levels and clean water of nitrates.
- One of the products from the natural process is CO2 emissions, however if microbial fuel cells are added to the Integrated wetlands not only do they produce energy, but they reduce these CO2 emissions considerably.

Building for a healthy life

- Building for a Healthy Life aims to help people create better places to live and to be an industry standard for design.
- It is a toolkit that is often referred to in Local Plans. Building for Life 12 was focussed on place making.

- The updated version extends that to have a health-related focus, so not specifically related to climate change.
- It is important to remember that through good and healthy place making, many issues relating to climate change are addressed as well. For example, Building for a Healthy Life recognises the following which are also related to climate change:
 - Responding to pedestrian desire lines – promoting walking and cycling
 - Improving public transport provision and connectivity
 - Protecting habitats – helping biodiversity adapt to climate change

Peat

- Peat has many special qualities, but the one relevant to the climate change work stream, is that peat is a carbon sink. If peat degrades or dries out, it becomes a carbon source.
- Peat soils release stored carbon if they are drained and allowed to dry out. The protection of peat soils is therefore critical to help address climate change.
- There are areas of peat in Norfolk.

Water usage of residential developments

- Fundamentally, the more water used by a development, the more energy is used, with associated greenhouse gas emissions.
- There is the potential for Local Plans to set a water usage standard of 110 litres per person per day, which is better than current building regulations.
- **There is a section in the NSPF that addresses water usage for new developments.**

Broadband and 5G

- Working from home, on-line shopping and communicating with others through the internet reduces the need to travel, with fewer greenhouse gas emissions as a result. There is strong evidence that shifting consumer patterns are now becoming more fixed around online shopping. Therefore, given...
- ...some areas in Norfolk do not have good access to broadband. New development needs to make sure that the facilities are in place to enable new occupiers to be digitally ready, including the necessary communications/phone infrastructure to facilitate the rollout of improved broadband (and 5G access in due course).
- **There is a section in the NSPF that addresses broadband and 5G roll out.**

Biodiversity

- A changing climate will affect biodiversity. That being said, ways of mitigating and adapting to climate change could benefit biodiversity. Indeed, ways of sequestering greenhouse gases, such as planting trees, will also benefit biodiversity. Biodiversity 'Net Gain' will be an established part of the planning process, once current legislation, going through the system, is fully enacted.

Norfolk Strategic Planning Framework

Shared Objectives for extending 4G coverage and the rollout of 5G infrastructure in the County of Norfolk

September 2020

Mobile^{UK}



Borough Council of
King's Lynn &
West Norfolk



NORWICH
City Council



Norfolk County Council

INTRODUCTION

Mobile connectivity to fast, reliable data services is becoming increasingly important to residents and businesses in Norfolk and constitutes a common expectation of everyday life. However mobile coverage in Norfolk, particularly rural areas isn't as good as it can be with a recent independent survey suggesting only 82 percent of call attempts in Norfolk are successful¹. While the survey shows Norfolk is comparable to the rest of the UK in some respects, it's clear there is still considerable room for improvement, particularly in ensuring people have reception wherever they are in the county.

To achieve this Norfolk authorities, in partnership with Mobile Network Operators need to be in alignment around a shared goal to the roll out of improvements and updates to the network, to vastly reduce the reception black spots prevalent within Norfolk.

The Norfolk Strategic Planning Member Forum has set up an officer group with the support of Mobile UK, to explore how to improve 4G and 5G infrastructure roll-out in Norfolk. This group is focused on setting out what operators and Norfolk's local authorities need to do to improve digital connectivity.

Improvements in mobile connectivity will entail both the extension of 4G coverage and the introduction of 5G in due course. 4G will not only improve mobile coverage where it is currently absent but will also provide the underpinning infrastructure for 5G, they will be complementary technologies.

The private sector is responsible for the delivery of Norfolk's digital connectivity. Further 4G and 5G roll-out will require significant investment by private telecoms operators. Outside of the Norwich Urban area, Norfolk is a challenging environment, whose digital infrastructure needs have been neglected in the past.

Future Growth

Smartphone ownership has grown from 52% in 2012 to 87% in 2018² and data usage is predicted by Giff Gaff to increase to as much as 98.34GB per month by 2025 from 3.95GB in 2017³

Businesses see broadband and mobile connectivity as critical to their company's growth. Digital connectivity also enables local authorities to deploy smart technologies which can help them plan services more efficiently. Everything from water and energy consumption to air quality and waste increasingly depend on data that needs to be transferred in real time for analysis.

To meet rising demand for data, operators expect to introduce the fifth generation (5G) of mobile technology from late 2019 into the major conurbations⁴. 5G is expected to directly contribute billions of pounds a year to the UK economy. 5G is likely to reach speeds that are twenty times faster than 4G LTE. 4G LTE has a peak speed of 1GB per second; 5G is able to achieve speeds of 20GB per second.

The Government's £1 billion Emergency Services Mobile Communications Programme (ESMCP) will ensure that Britain is a world leader in Emergency Services communications, and a 4G pioneer. The network and infrastructure provider EE has been selected to deliver critical new 4G voice and data network for Britain's Emergency Services. EE already has the UK's biggest and most mature 4G network, and will expand coverage and enhance resilience to meet the Emergency Services' critical communications requirements.

¹ See <https://www.norfolk.gov.uk/mobilemap>

² See Deloitte Survey - <https://www.deloitte.co.uk/mobileuk/>

³ See <https://www.ispreview.co.uk/index.php/2018/01/giffgaff-predict-uk-5g-mobile-data-use-per-user-100gb-2025.html>

⁴ Including Glasgow, London, Manchester, Liverpool, Birmingham, Cardiff and Bristol

Mobile Coverage in Norfolk

Norfolk County Council commissioned AWTG (Advanced Wireless Technology Group) to conduct an independent benchmark assessment of mobile coverage and user experience across Norfolk. The benchmarking campaign was conducted in February and March 2018 using a robust four-tier methodology to maximise the extent and breadth of data collection. This included walk testing at over 30 locations including museums, tourist attractions, camping and caravan sites, rail testing on all main rail routes in Norfolk, drive testing on over 5,500 kilometres of Trunk, A, B and C class roads across Norfolk and stationary testing at enterprise zones and 28 Norfolk Broads mooring points. The scope of the campaign covered a detailed assessment of the GSM (2G), UMTS (3G) and LTE (4G) radio network (coverage) performance and received signal strength of the four main mobile network operators in the UK.

The headline results are that where coverage is available the quality of service is good. However, there are significant gaps in coverage across all 4 providers such that one call in 5 placed will currently fail.

The table below shows how often the signal strength matches the Mobile Network Operators (MNO) minimum target. When using a regular phone the latter figure would be the one which would relate to a good user experience.

Metric	Summary of Main Findings
2G	Coverage <ul style="list-style-type: none">• 98.83% Service availability on test handset based on MNOs defined threshold• 74.28% Service availability on test handset based on Ofcom defined threshold
3G	Coverage <ul style="list-style-type: none">• 89.74% Service availability on test handset based on MNOs defined threshold• 65.68% Service availability on test handset based on Ofcom defined threshold
4G	Coverage <ul style="list-style-type: none">• 98.92% Service availability on test handset based on MNOs defined threshold• 83.38% Service availability on test handset based on Ofcom defined threshold
Voice	<ul style="list-style-type: none">• Voice performance acceptable when user is within the coverage area.• 82% call attempt success rate and 98% call completion rate.• Average voice quality is 3.93 out of 5• Average call setup time is 3.27 seconds
Data	<ul style="list-style-type: none">• Data performance acceptable when user is within the coverage area.• 14.54Mbps average DL speed / 7Mbps average UL speed• Average download time for webpage is 6.86 seconds• 86.46% of web browsing tests completed successfully

Implications for 5G roll out

5G will use a wide range of frequency bands⁵, such as 700MHz, 3.4GHz and 30GHz

The higher frequencies of 5G will have a shorter range. Achieving the levels of network capacity where there is a very high volume of network traffic will over time increasingly rely on smaller cells situated nearer to the ground on lampposts and other street furniture, in addition to rooftop and ground-based masts.

Whilst more base stations will be required, Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which can be rolled out on existing infrastructure where possible. The initial phase will be to strengthening the existing infrastructure or rebuilding the network where required, then densification for major areas using small high frequency cells which will be rolled out in areas with high demand. The rollout of 5G commercially is expected to commence in late 2019, and take several years to complete. Getting high quality 5G infrastructure rolled out across Norfolk will be important to delivering the vision of the Norfolk Strategic Planning Framework.

Mobile operator investment in mobile coverage is ongoing around the UK. In addition, Ofcom is currently consulting on the 2020 auction of further spectrum licences (in 700MHz and 3.8GHz bands). It is expected that further 4G coverage obligations for rural coverage will be attached to the new licences. It is very important that Norfolk is well positioned to take advantage of the new rural coverage obligations and also for 5G rollout (which is expected to occur initially in urban areas, where the capacity need is greatest.)

Mobile networks are integrated entities made up of cell sites, switches, and backhaul. Backhaul is the cables that link up the cell sites to the switches that transmit data quickly around the network. Making Norfolk ready for 5G also means making it easier to roll out full-fibre connections underground.

The recently announced £8m of funding from DCMS to upgrade 372 Norfolk sites will enable 230 schools, 108 Norfolk County Council Corporate buildings (including 38 libraries) and 34 fire stations to be upgraded to gigabit (1,000 mbps) fibre internet connections within two years. Where possible, fibre backhaul will also be provided to improve mobile data capacity.

Extending 4G coverage and meeting the scale of the 5G and digital roll-out challenge will require a considerably more joined-up approach than is currently the case. This means a complete alignment of Norfolk's local planning authorities and operators towards a shared goal to improve digital connectivity, focused on meeting the specific challenges of rolling out 5G.

⁵ <https://5g.co.uk/guides/5g-frequencies-in-the-uk-what-you-need-to-know/>

What can Mobile Network Operators and their contractors do to improve mobile connectivity in Norfolk?

In order to drive progress in Norfolk, we need to ensure that mobile operators are committed to following the Code of Best Practice for Mobile Network Development⁶, and in relation to the Broads, the National Parks England and Mobile UK Joint Accord / Memorandum of Understanding⁷ in particular:

1. Sharing suitable mobile digital connectivity infrastructure sites where this meets network objectives.
2. To work with the Norfolk local planning authorities to facilitate early access to public sector owned buildings and structures to improve coverage. Where possible, fibre backhaul will also be provided to improve mobile data capacity (for 4G and 5G).
3. Share Roll out plans at county level to provide a valuable opportunity for operators to share information about their proposals with local planning authorities who can in turn offer feedback and advice on the suitability of the plans⁸.
4. Detailed consultation with planners at both pre-application and planning application stages, working together to solve the continuing demand for mobile connectivity in a timely way. Ensure that applications are clearly presented and understandable to both professionals and members of the public
5. Consultation with communities and other stakeholders about network developments, in accordance with the Code of Best Practice.
6. Proposing appropriate design solutions in line with national and local policies which achieve technical objectives.

⁶ See <http://www.mobileuk.org/codes-of-practice.html>

⁷ See https://www.nationalparksengland.org.uk/data/assets/pdf_file/0009/1253682/Mobile-UK-National-Parks-England-Accord-2018.pdf

⁸ Where required Non-disclosure agreements can be in place to ensure market sensitive information is not shared with competitors

What can Local Planning Authorities do to improve mobile connectivity in Norfolk?

Local planning authorities can support Mobile Network Operators in their improvements to mobile connectivity in Norfolk through:

1. Ensuring Local plans and Economic Strategies recognise the benefit of reliable connectivity and include actions to be taken at local level to enhance mobile connectivity.
2. Making local authority-owned buildings and structures available for use where appropriate for the location of equipment needed to improve mobile connectivity in locations which currently have poor coverage.⁹
3. Respond positively to requests for pre-application advice, where new or upgraded infrastructure is proposed the potential impacts on the local environment will need to be considered. The Norfolk local planning authorities encourages early engagement from operators where new network infrastructure is proposed in order to identify and discuss any particular issues with the design or siting of new equipment and to reach mutually agreeable solutions. Norfolk local planning authorities will engage with the County Council for applications which may have a wider impact on other existing built and natural infrastructure. The County Council are also able to offer advice and assistance with way leaves. Operators will be encouraged to develop innovative solutions in terms of design, structure, materials and colouring to ensure that these issues are appropriately addressed and the impact of installations minimised.
4. All planning applications for telecommunication infrastructure will follow the statutory requirements in terms of providing timely decisions on planning applications raising issues sufficiently early to allow mobile operators time to provide information and work together to find solutions. All application for new base stations and upgrades to existing ones will be considered in line with national and local planning policy. Any planning conditions will be applied appropriately and proportionately and will not duplicate conditions already imposed by statutory instruments such as the Electronic Communications Code¹⁰.
5. New major development sites (over 10 dwellings) and large scale buildings should include infrastructure design from the outset to sympathetically locate masts, and/or provide backhaul ducting to negate the need for retro-fix infrastructure.
6. Work with Mobile UK to maintain communication channels about progress of technology and the roll out of 5G and network enhancements. Provide knowledge on telecommunications planning, including permitted development rights. Share local plans and growth locations to understand the impact on mobile network capacity and coverage taking into account local economic development, digital connectivity, sustainability, and social inclusion considerations.

⁹ See www.norfolk.gov.uk/mobileassetregister

¹⁰ <https://www.ofcom.org.uk/phones-telecoms-and-internet/information-for-industry/policy/electronic-comm-code>

National Planning Policy Context

The National Planning Policy Framework 2019 (NPPF) sets out government's planning policy approach to achieving sustainable development for England. Paragraph 20 (b) states an expectation that development plans should contain strategic policies making sufficient provision for telecommunications infrastructure. Delivery of advanced, high quality and reliable communications infrastructure is covered in section 10 'Supporting high quality communications' paragraphs 112 to 116. The NPPF considers that such communications infrastructure is essential for economic growth & social wellbeing.

The framework policies lay out expectations of plan makers, applicants and decision takers – encouraging local authorities to take a pro-active and supportive approach, stating: "Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections... providing access to services from a range of providers"; and for applicants to fully consider the appropriate locations and impacts of their proposals relating to design, location and in accordance with International Commission guidelines.

Paragraph 39 of NPPF 2018 advises that Pre-application early engagement has significant potential to improve the efficiency & effectiveness of the planning application system for all parties.

Not all communications infrastructure requires formal planning consent, certain installations may be carried out under permitted development or application for prior approval under Schedule 2, Part 16 'Communications': Classes A to E of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

On 22 July 2020 the Government published its response to the joint MHCLG and DCMS consultation published last year on proposed planning reforms to support the deployment of 5G and extend mobile coverage. This included the principle of amending permitted development rights for operators with rights under the Electronic Communications Code and the circumstances in which it would be appropriate to do so.

The government response summarises the submissions received and confirms its intention to take forward the in-principle proposals consulted on. This will be subject to a technical consultation with representatives from both the local planning authority and mobile industry sectors representatives, on the detail of the proposals, including for appropriate environmental protections and other safeguards to mitigate the impact of new mobile infrastructure.

This will be undertaken prior to amending Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to enable:

- the deployment of taller and wider masts;
- building-based masts located nearer to highways; and
- faster deployment of radio equipment housing, such as equipment cabinets.

Local Planning Policy Context:

This guidance has been prepared to inform the Local Planning Policy of all local planning authorities under the Norfolk Strategic Planning Framework in order to provide a uniform and pro-active approach to communications infrastructure in Norfolk countywide. It is intended that the policy content provided here may be incorporated into individual Local Plans as they are reviewed.

Suggested Telecommunications Infrastructure Policy

The Council will support proposals for the provision and improvement of new telecommunications infrastructure provided that:

- It has been demonstrated that there are no reasonable opportunities for sharing a site, mast or facility with existing telecommunications infrastructure in the area that would not result in a greater visual impact, and;
- The installation and any associated apparatus is sited and designed to avoid any unacceptable impact on the character, on residential amenity or on the safe and satisfactory functioning of highways and appearance with particular consideration given to the impact on:
 - designated or locally identified heritage assets; or
 - internationally and/or nationally protected nature conservation sites, AONBs, regional and local sites, and areas of designated open space (as shown on the Policies Map).
 - the special qualities of the Broads
- It has been demonstrated that the siting of the proposal and any other additional equipment involved with the development does not unduly detract from the appearance of the surrounding area, including the use of innovative design and construction and/or sympathetic camouflaging, and;
- Any building-mounted installations would not have an unduly detrimental impact on the character or appearance of the building.
- Prior approval of the siting and appearance of the development will be required if the proposal is within or would affect the Norfolk Coast AONB, The Broads, a Conservation Area, a Listed building, a site of archaeological importance or a site designated for its nature conservation importance.

Although larger scale telecommunications development requires planning permission, there are many aspects which do not, as they are permitted by virtue of the General Permitted Development Order (GPDO). Where it is the intention to install equipment under permitted development rights that is subject to the prior approval procedure, consideration must be given to the siting and appearance of development in accordance with the requirements of the GPDO and the relevant safeguards imposed by the operator licensing regime. The GPDO also requires operators to remove any telecommunications equipment when it is redundant elsewhere.

All residential developments and new employment generating development should consider the mobile telecommunications requirement of the development proposals to ensure and demonstrate that there would be sufficient coverage. This information should be submitted in a site connectivity plan during the pre-application and application stages.

COVID RECOVERY REPORT

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Portfolio: Leader

Ward(s) Affected: All

Purpose of the Report:

To:

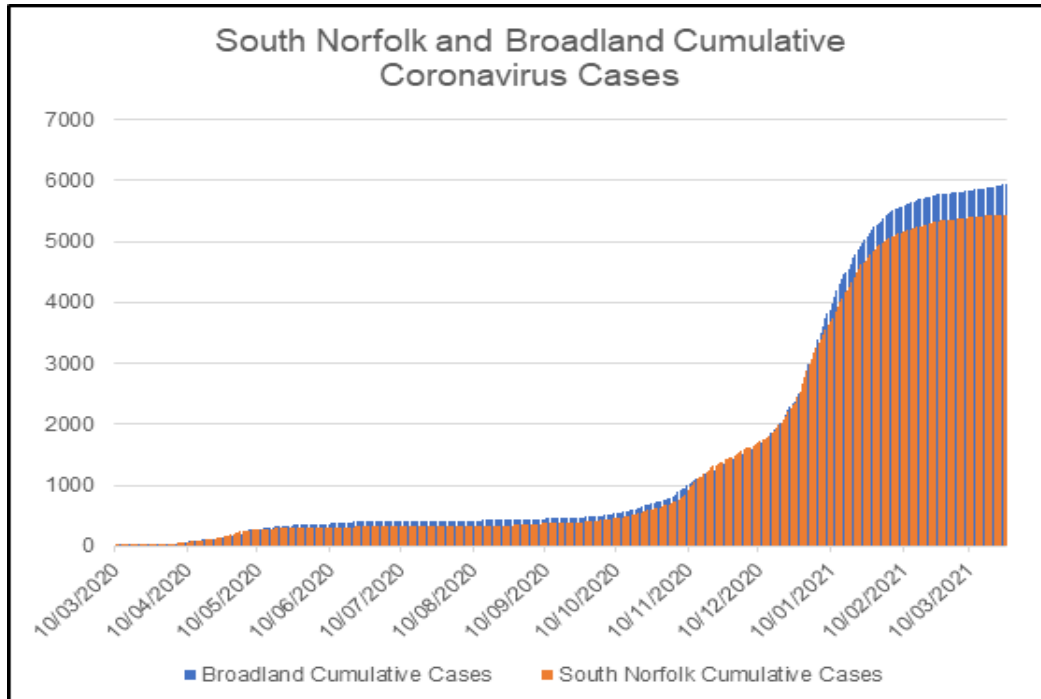
- Provide an update on the ongoing impact of Covid on the district and the Council's ongoing response.
- Provide an update on 'Our Plan for Recovery from the Covid19 Crisis' (agreed by Council in July 2019) and the next steps for our plan for recovery.
- Provide an overview of Covid funding sources, allocation, and spend used to support the Covid response and recovery.

Recommendations:

1. To note the local impact of Covid-19, together with the activities the Council is taking to mitigate those impacts.
2. To note the progress made towards delivering the actions set out in 'Our Plan for Recovery from the Covid-19 Crisis', and to recommend the update of the Recovery Plan to be considered by Cabinet in June.
3. To release the following sums to further support the Covid recovery (from the Un-Ringfenced Covid money)
 - Council Tax and Recovery Team Resource £61,600.
4. To agree a delegation to the relevant director, in consultation with the relevant portfolio holder, to release COMF funds to support activities consistent with the projects listed in this report.

1. Summary

- 1.1 Coronavirus is the biggest challenge the UK has faced in generations. Its impact on people's health, wellbeing and the economy continues to be substantial both globally and locally, and the ramifications will be felt for years to come.



- 1.2 Cabinet on 21 July 20 agreed the initial Covid Recovery Plan. Good progress has been made, with a number of the actions completed. However, effort has been focussed around the Council's continued Covid response. Outstanding Recovery Plan actions have either been built into the 21/22 Delivery Plan, or will form part of the next update of the Covid Recovery Plan which it is intended to bring to Cabinet in June.
- 1.3 The Council has to date managed to respond to the pandemic within agreed resources. This has been done by utilising existing staffing resources to support the Covid response, as well as limited additional staff being recruited to meet particular demands (e.g. Covid Support Advisors). As we start the new financial year there is now a need to provide additional resource in some areas to enhance our Covid recovery response.

2. Background

- 2.1 The Covid-19 pandemic is an unprecedented global crisis which has, since March 2020, had a significant impact on our communities, businesses and council services.
- 2.2 Having experienced two previous national lockdowns and movement between Tiers 2 and 4 in December 2020, the whole of England entered the current national lockdown on 4 January 2021.
- 2.3 On 22 February the government set out its 4 step Roadmap plan to cautiously ease restrictions in England, starting with the return of children and students to education on 8 March. On 12 April the next step of the Roadmap will have enabled non-essential businesses to reopen and put the economy firmly on the road to recovery.
- 2.4 The Council's structure for responding to the latest lockdown continues to be robust and is inextricably linked to the national emergency planning framework and the Norfolk wide response.
- 2.5 The Council's structure includes the Covid-19 Coordination Group (C19CG) which together with the Corporate Management Leadership Team is the Gold level for officer decision making. The C19CG is chaired by the Chief of Staff.
- 2.6 In addition to the Gold group there are two further groups. Silver Group is chaired by the Director of People and Communities and is the driving force behind the direction, organisation and delivery of the Council's operational community activities.
- 2.7 The third group is the Business and Economic Recovery Group which is chaired by the Assistant Director Economic Growth and is currently focused on the delivery of the Council's business support grants and re-opening of high streets.
- 2.8 The council has supported an effective and impactful approach to respond to the pandemic to ensure support for residents and businesses as well as adapted the way in which it operates. Some of the highlights of the Council's actions can be found in **Appendix A**.

3. Impact of Covid 19

- 3.1 The impacts of Covid-19 to date are many and varied but can be grouped under the following themes.

Health

- As of 25 March, there have been 5,433 positive tests for COVID-19 in South Norfolk. There have been 208 deaths within 28 days of a positive coronavirus test in South Norfolk.
- Around 10% of those who have tested positive have symptoms for 10 weeks or more or have 'long Covid'. Longer term impacts are uncertain. This suggests around 540 residents of South Norfolk have / will suffer with long Covid.
- 8,565 residents in South Norfolk are classed as clinically extremely vulnerable to COVID-19 (CEV). 30-40% of CEVs in our South Norfolk and Broadland are working age.
- Sport England's Active Lives survey found that 3 million fewer adults (7%) are classed as active compared to before the pandemic.
- As at 24 March the national vaccination programme has resulted in the following receiving their first vaccination
 - 100% of those aged 80+
 - 100% of those aged 70-79
 - 90% of those aged 60-69
 - 29% of those aged 16-59.
- (Populations are based on ONS Mid-2019 Estimates, so percentages are slight overestimates.)

Wellbeing

- Temporary accommodation occupancy across South Norfolk and Broadland is roughly two thirds higher than average and has been at this level for most of the past year.
- The increase in poor mental health has been largest for 18-29 year olds (and overall, they report having the worst mental health). This is likely to be driven by a mix of the physical health, social and economic aspects of the pandemic and lockdown.
- Research from the University of Sheffield suggests that the shift to home working during Covid-19, or 'Zoom shock', may have major long-term impacts for survival of local goods and services provided in city centres and business parks.

Economy

- Although the recent Grant Thornton report states that SNC is amongst the local economies expected to bounce back the best, the district has still experienced a significant economic shock.
- National data from BICS suggests that 2.1% of microbusinesses (those with 9 or fewer employees) have permanently ceased trading (220 businesses across South Norfolk and Broadland).
- According to analysis by the Bank of England, the pandemic reduced cash flows for many companies, with smaller companies "more likely than larger companies to operate in sectors that have been most affected by the shock, such as accommodation and food, arts and recreation, and construction".
- Graduates this year will be 13% less likely than previous cohorts to have a job in 3 years' time. For those leaving school with the fewest qualifications, this figure rises to 37%.
- As a result of the pandemic, the UK economy was 7.9% smaller in October than it was pre-lockdown, despite recovering ground since April. The economy is predicted to be back to end of 2019 levels between 2022-2025, although this prediction varies depending on the source. The rapid rollout of effective vaccines offers hope of a swifter and more sustained economic recovery, albeit from a more challenging point than we forecast in November. The easing of public health restrictions in line with the Government's 22 February Roadmap should permit a rebound in consumption and output through this year, supported by the release of extra savings built up by households during the pandemic. GDP is expected to grow by 4 per cent in 2021 and to regain its pre-pandemic level in the second quarter of 2022, six months earlier than we forecast in November.

3.2 All these issues put additional strain on our services. Key pressures being:

- Additional calls to our Help Hub
- Rise in housing and council tax benefit claims
- Additional requests for support to businesses
- Increase in debt levels of residents
- Ongoing support to businesses and start-ups.

4. Our Plan for Recovery

4.1 Our Covid Recovery Objective can be summarised as:

Making the most of opportunities arising from the Covid Recovery whilst mitigating the worst of the effects of the pandemic.

4.2 This means supporting families, communities and businesses to reconnect and make a fresh start.

4.3 The Covid Recovery Plan was approved in July 2020 and is based around a strategic 6-point plan linked to 3 key themes Our Economy, Our Communities, Our Council.



4.4 At the time at which the Recovery Plan was approved, there was a sense of cautious optimism with the country coming out of a first national lockdown. However, a second surge of positive cases resulted in a further lockdown in November and then December 2020.

4.5 Inevitably the second and then the third lockdown over winter this year forestalled much of the recovery work the Council had planned, with resource and staff being redeployed back into response roles.

4.6 However, in spite of the diversion away from recovery a number of elements within the plan have been delivered and the Council has continued to:

- Support our businesses to survive and continue to operate where possible
- Delivered an unprecedented programme of Business Support Grants
- Maximised business opportunities by flexing our regulatory powers
- Developed our Community Hub to support the vulnerable and communities most in need to manage through the pandemic
- Harnessed and grown the Community Links programme to build capacity in local communities to respond to the pandemic locally
- Closely monitored the Council's finances and the impact of Covid-19, ensuring resources utilised effectively
- Worked alongside our Local Government partners to lobby Central Government for stable and fair funding to offset the impacts of Covid.

4.7 **Appendix B** provides a brief update on all of the actions in the initial Covid Recovery plan.

5. Overview of Covid Funding

- 5.1 Since the start of the pandemic there have been various funding streams to support the Pandemic. The main funding streams are:
- General Un-ringfenced Covid Monies to support our services
 - Funding to support our Towns and Villages
 - Track and Trace (Isolation Support Payment) support
 - Enforcement / Contain Outbreak monies
 - Support for homelessness
 - Hardship support
 - Business Grants.
- 5.2 This report focusses on the General Un-ringfenced monies and the Contain Outbreak monies as these are the areas where there is more discretion on how these are utilised.

6. General Un-Ringfenced Covid Monies to Support Our Services

20/21 Covid Monies

- 6.1 In 20/21 the Council was awarded four tranches of Covid grant totalling £1.852m to cover the additional costs it incurred responding to the Covid pandemic.
- 6.2 **Appendix C** provides details of how Members agreed to allocate this money during 20/21.
- 6.3 The following table provides a summary of how the Council has allocated the general funding, and how much has been spent / committed to date.
Appendix D provides a further breakdown of the figures highlighted in blue.

	Allocated £'000	Spend £'000	Committed £'000
General Expenditure (£250k+£55k+£450k)	755	681	344
Homelessness Expend. (£250k+£50k)	300	172	
Operation Beacon to support businesses	50	54	
Business facilities grants	50	20	
Cost of Council tax support Note 1	256		256
Reduction in Council tax collection Note 1	154		154
Increase in DHP budget Note 2	50		
Hardship money Note 3	100	100	
Contribution to Norfolk Strategic Fund	150	150	
Unallocated	-13		
	1,852	1,177	754

Note 1: Due to how local authority accounting works the reduction in council tax income only affects revenue a year in arrears. These sums will therefore go to an Earmarked Reserve and then be released in 21/22 to offset the reduction in 21/22.

Note 2: It was agreed that we would only call on this if the main DHP budget was overspent. As at mid-March we have spent £175k of the £205k main budget. So, no need to call on this extra funding at present.

Note 3: Emergency Committee 5 June 20 agreed to use £100k of Covid money to top up the £150 additional support given to council tax assistance claimants. This is expected to be fully used.

- 6.4 With regard to the General Expenditure line, it needs to be borne in mind that the Councils have been operating in an ever-changeable environment. The actual spend in 20/21 is lower than the allocation. This is primarily for two reasons:
- 1) Some of the additional Covid appointments commenced later than originally factored into the ask.
 - 2) There were a number of asks that would only be called upon if needed, and not all these needs have yet arisen.

The Committed column represents the continuation of the agreed allocations into 21/22.

- 6.5 The 20/21 General expenditure includes the cost of the staff that have been redeployed to support the Covid response. **Appendix D** provides a snapshot of what these redeployed staff have been supporting.

21/22 Covid Monies

- 6.6 For 21/22 the Council has been awarded £0.662m in additional grant to cover the additional costs it will incur responding to the Covid pandemic.

	£'000
COVID - Emergency Funding for Local Gov	631
COVID - Local Council Tax Support	163
	794

- 6.7 The following table shows what commitments have already been agreed for these monies.

	Committed £'000
Cabinet 15 Feb 21	
- Covid Hardship Fund 21/22	25
	25

Summary of Remaining Covid Budget Available for Recovery Work

- 6.8 The following table provides a summary of the General Covid Monies that are still available to allocate (ie the total received, less the amount spent or committed).
- 6.9 This is the funding we have available to recover our organisational position and invest in our business and community support activities to recover from the impacts of the pandemic during 21/22. This funding is therefore available to support the implementation of a revised recovery plan.

	£'000	£'000
2020/21 Covid Monies		
- Grant allocation	1,852	
- Less Spend	-1,177	
- Less Committed	-754	-79
2021/22 Covid Monies		
- Grant Allocation	794	
- Less Spend	-	
- Less Committed	-25	769
Available		690

Allocation of Available Funding

- 6.10 Officers are currently working with members to firm up proposals to utilise this available funding in order to best support businesses and families.
- 6.11 It is proposed that the update of the Covid Recovery Plan (which it is intended to bring to Cabinet in June) will contain detailed plans for the use of the available funding.

Overview of approach

- 6.12 However, in advance of this, Members are requested to consider the following themes for this funding. The support will be based on supporting our families, communities and businesses 'over the line'. With the last year stretching resilience to the limit, the Council wants to ensure the district is best placed to bounce back to recovery. Our focus will be on three areas:
- Supporting families to de-conflict, keep afloat and get back into work.
 - Keeping our communities together and resilient.
 - Provide businesses the support to re-open and sustain employment.
- 6.13 Keeping £200,000 aside to ensure we can meet unexpected, we will provisionally allocate £250,000 to families and communities, with £250,000 going to business support.
- 6.14 This approach within families and communities will see the Council inject a programme of extra support into our families and communities to problem solve when they just cannot manage to do this themselves, whether with mediation to

calm situations down, keeping people in their home, financial resilience or to provide a leg up to a fresh start to change careers or come back to work.

- 6.15 For business support, we know that some of our businesses are viable but have reached their financial limits and will struggle to start up again. Where there is clear opportunity to bring back staff from furlough, and / or to recruit new staff, the Council will be there to give a small boost to restart the business. By investing now in our businesses, we will reap the financial benefits as well as offering more employment opportunities to our families.

Council Tax and Recovery Team resource.

- 6.16 In addition, in advance of the June meeting, Members are requested to consider the following specific request now in order to allow the Council to progress with this action now.
- 6.17 The council tax team are responsible for ensuring residents are billed accurately and in a timely manner to safeguard the cashflow for the Council. The team is also responsible for chasing overdue payments and ultimately taking non-payers to court.
- 6.18 Volumes of incoming post, emails and other work for the council tax team has increased by 17.5% over the last year in comparison to the same period in 2019/20 as shown below:

Period	Incoming work 1.4.19 to 3.2.20	Incoming work 1.4.20 to 3.2.21	% increase
Broadland	34,898	40,634	17%
South Norfolk	37,237	44,037	18%
Total	72,135	84,671	17.5%

- 6.19 The pandemic has also seen an increase in complexity of calls from customers struggling to deal with the difficulties of the pandemic and payment of their council tax. The duration of many calls is longer, and staff are having to spend more time helping residents and liaising with other services.
- 6.20 The issues which the team are facing are mirrored in Billing Authorities across the country. There is no doubt that 2021/22 will be a very challenging year as authorities try to collect arrears from 2020/21 whilst at the same time dealing with the new year council tax.
- 6.21 Officers are therefore requesting a temporarily increase in resource in the council tax team by 2 FTEs for an 18 month period at a cost of £70,000 and for the recovery team 1 FTE for an 18 month period at a cost of £42,000. The total cost would be split between BDC and SNC and would be funded through Covid money (£70,000 + £42,000 = £112,000 x 55% = £61,600).

7. Containing Outbreak Management Fund (COMF)

- 7.1 The Government has made available to the Norfolk system a significant amount of resource which is to be used to help ongoing containment of the spread of the virus over the coming months.
- 7.2 The first wave of 20/21 COMF money drawn down to the district council of **£250k** have been used to put in place COVID Support Advisers (CSAs) who have proven highly successful in a number of activities to support behaviour change around COVID including:
- Enhanced Contact Tracing
 - Isolation support
 - Having a strong community presence and undertaking communications with residents in areas showing significant case levels
 - Engagement with local businesses.
- 7.3 The latest round of 20/21 COMF money made available by Government has led to funding of **£399k** being allocated to the Council. This money can and will be used over the coming financial year to help support the Council's strategy of containment and feeding into the longer term recovery from the pandemic (which will be subject to a future report). The Government's principles of how the COMF money can be utilised are as follows:
- Targeted testing for hard-to-reach groups out of scope of other testing programmes.
 - Additional contact tracing.
 - Enhanced communication and marketing (e.g. towards hard-to-reach groups and other localised messaging).
 - Delivery of essentials for those in self-isolation.
 - Targeted interventions for specific sections of the local community and workplaces.
 - Harnessing capacity within local sectors (e.g. voluntary, academic, commercial).
 - Extension/introduction of specialist support (behavioural science, bespoke comms).
 - Additional resource for compliance with, and enforcement of, restrictions and guidance.
 - Targeted support for school/university outbreaks.
 - Community-based support for those disproportionately impacted such as the BAME population.
 - Support for engagement and analysis of regional areas to assess and learn from local initiatives.
 - Providing initial support, as needed, to vulnerable people classed as Clinically Extremely Vulnerable who are following tier 3 guidance.

- 7.4 The below table is for Cabinet to note and gives an indication of how this money will be allocated, and the rationale for using the COMF money. It is important for Cabinet to note that, given the nature of the COVID environment and the speed of creation of new Government policy in response, these allocations will be liable to change at the discretion of the Managing Director. Any use of resource which falls outside of officer discretion as per the constitution will be subject to the appropriate decision making process and business case.
- 7.5 Whilst the COMF funding has specific criteria to meet, the themes of families, communities and businesses are still valid. A programme of support to complement un-ringfenced monies includes.

Scheme	Assistant Director	Allocation
Extending the COVID Support Advisor Service	Mike Pursehouse / Nick Howard	£144k
Engagement Officers	Mike Pursehouse	£30k
Development and Call Down from COVID Bank Staff or Agency	Nick Howard	£28k
Improving infrastructure and support to Mutual Aid groups	Mike Pursehouse	£10k
Young Person Mental Health Support Worker(s)	Mike Pursehouse	£47k
Whatever It Takes Grant	Mike Pursehouse	£25k
Increased Licensing Team Capacity	Nick Howard	£20k
Reopening the High Street Awareness Campaign	Tig Armstrong	£25k
Broadland and South Norfolk COVID Safe Business Awards	Nick Howard	£10k
Anti-Social Behaviour Support	Mike Pursehouse	£60k
		£399k

More detail is included in **Appendix E**.

- 7.6 Cabinet is therefore asked to agree a delegation to the relevant director, in consultation with the relevant portfolio holder, to release COMF funds to support activities consistent with the projects listed in this report.

8. Issues and risks

- 8.1 The single greatest risk to the Council's ability to recover from the pandemic is the advent of a further outbreak, likely driven by new and more transmissible variants and potentially further lockdown. It is noted through the report that a degree of flexibility will be required in terms of how the council continues to response to the pandemic whilst planning and delivering its recovery objectives.
- 8.2 Resource Implications – The body of this report provides information on the funding available to support the Covid response and how this is being allocated.
- 8.3 Legal Implications – The Council has a legal duty to ensure its financial position remains robust, whilst at the same time responding appropriately to the needs of the community in response to Covid.
- 8.4 Equality Implications – The impact of Covid does vary by group. Older and BAME groups are more likely to suffer serious health impacts, younger groups are more likely to suffer serious economic impacts. Our response needs to reflect these differences in order to support those most in need.
- 8.5 Environmental Impact – Covid is having an environmental impact for instance on travel and recycling. Our response needs to acknowledge these impacts and respond appropriately.
- 8.6 Crime and Disorder – There has been a noticeable recent upsurge in cases of low level anti-social behaviour and nuisance related to COVID enforced behaviours. It is anticipated the need to use some COMF monies to support the council's response to this demand, to dissipate the issues and enable correct and safe behaviours.

9. Next Steps

- 9.1 The Council will continue to provide appropriate support to our residents and businesses over the short / medium term.
- 9.2 Officers will continue to develop the longer term recovery plan for consideration by Cabinet in due course.

10. Recommendations

1. To note the local impact of Covid-19, together with the activities the Council is taking to mitigate those impacts.
2. To note the progress made towards delivering the actions set out in 'Our Plan for Recovery from the Covid-19 Crisis', and to recommend the update of the Recovery Plan to be considered by Cabinet in June.
3. To release the following sums to further support the Covid recovery (from the Un-Ringfenced Covid money)
 - Council Tax and Recovery Team Resource £61,600.
4. To agree a delegation to the relevant director, in consultation with the relevant portfolio holder, to release COMF funds to support activities consistent with the projects listed in this report.

Background papers

Report to Emergency Committee 22 May 20	Review of 2020/21 Budgets.
Report to Emergency Committee 5 Jun 20	Review of 2020/21 Budgets.
Report to Cabinet 21 July 20	Out Plan for Recovery from the Covid-19 Crisis
Report to Cabinet 24 Aug 20	Covid 19 Response – Norfolk Wide Fighting Fund
Report to Cabinet 2 Nov 20	Budget Update Report
Report to Cabinet 7 Dec 20	Budget Update – 2 nd Wave Covid Funding

Appendix A: Covid Actions taken by the Council

Working together to fight Covid 19





Corporate achievements

85% of staff working remotely	15% of staff working from our offices	32 of our leisure staff redeployed to the NHS, with a further 48 of our staff offering time to help the NHS
Launched zoom to over 600 staff and Councillors	140 virtual committee meetings broadcast on YouTube, with over 19,500 views, totalling 4,700 hours watch time	44 Trained Mental Health First Aiders

Help Hub

20,104 calls taken from residents asking for help	5,000 calls made to shielding residents	7 day a week working
Hub support line opened until 22:00	4,373 individuals visited on enhanced contact tracing to support self- isolation	



In the community

2,750
prescriptions
collected

3,150
shopping
trips done

560
households
in food
poverty fed

4,000
food parcels
delivered

8 TONS
of food
distributed
to residents

45
community
support groups
formed with
4,000
volunteers

Housing

73
residents provided
with temporary
accommodation

739
residents housed

781
people
helped onto the
housing register

1,694
people a
month provided
housing advice



Financial support to residents

51,764
calls taken by
the Housing
and Benefit
Team

5,821
Benefit and
Council Tax
Support claims
received

£73,000
paid through
Covid-19
hardship
fund

£1,260,935
paid in extra
Council Tax
support

£263,000
paid in track
and trace
payments

Supporting Businesses

**£84
million**
in grants distributed to
local businesses

10,000
businesses
called offering
support

First Councils
to distribute
£1 million
to businesses
forced to close

£1 million
of support
distributed for
every week of
lockdown



Planning

4,372

planning
applications
determined

30

virtual
planning
meetings
held

Appendix B: Update on actions in the initial Covid Recovery plan.

COMMUNITIES - Develop our Community Hub and partnership working model

Action Plan Point	Status	Progress Update
Short Term		
Working collaboratively, define our approach to responding to the surge of hidden issues which are likely to increase as the lock down reduces, such as support for victims of domestic abuse and mental health issues	Ongoing	Regular and ongoing monitoring of need within the community is underway, enabling the help hub to work closely with partners to make sure that services are available to support our residents. As the pandemic has evolved, so too have the needs, with less emphasis now on basic essentials and more focus on hardship and longer-term vulnerability and the consequences of social isolation. Work is ongoing to understand and proactively address issues around pent up evictions of notices to quit for tenants via welfare and hardship advice and access to short term funding and assisting residents with issues around family tensions or domestic abuse. Immediate needs continue to be well met, whilst longer term impacts will form a part of the councils' recovery considerations
Produce a comprehensive Impact Assessment, to understand the impacts the pandemic has had on our communities. This will form an evidence base for future service design	Ongoing	See above
Harness the voluntary sector which has grown during the pandemic by engaging volunteers in meaningful activity which connects them within their local communities	Complete	The Council is working closely with Mutual Aid and neighbourhood groups who have played such a vital community support role through the pandemic, meeting over 7,400 individual requests for support. Officers continue to support these groups on a day to day basis and facilitate contact between those in need and those who can support.
Ensure the Council Tax recovery process signposts those in need to the early help hub	Complete	Complete
Medium Term		
Review lessons learnt and the role of our Help Hubs, with the ambition to	Ongoing	The pandemic has accelerated the development of the council's discretionary and preventative help hub arrangements, embedding

Action Plan Point	Status	Progress Update
develop an even more effective collaborative Community Hub model		arrangements locally by providing a credible source of assistance to residents, and also improving partnership working through better information sharing with partners to allow a more common view of vulnerability. The adaptability of the help hub has been proven in its ability to support over 1,950 enhanced contact tracing cases at a doorstep level, supporting local GP practices with the vaccination programme and particularly harder to reach groups, and the delivery of over 7,500 COVID tests through Operation Eagle in Diss and Roydon. A paper on Help Hubs is due to come to cabinets in Q2 21/22
Given the upsurge in neighbourhood schemes and mutual aid groups which have largely met local demand for community support, develop a clearer and cohesive position on community capacity development across the districts	Ongoing	The Community Links project has developed closer and more integrated working practices with Mutual Aid groups, with work now underway to look at developing supporting infrastructure such as training and development of community leaders and the development of a CIC to allow the MAGs to call down funding direct to community level.
Support voluntary and community groups to return to their business as usual and support for new groups to continue proving critical support to the community	Ongoing	See above
Long Term		
Build and harness the relationships we have developed with key partners during the pandemic, in particular adult social care and mental health services	Ongoing	<p>A variety of work is underway to develop our working relationships with key partners, which includes:</p> <ul style="list-style-type: none"> - The establishment of a county wide strategic housing board to augment our work on a greater Norwich footprint. - Development of work around inequalities through the Health and Wellbeing board district sub-committee. - Work to look at the delivery of holiday activity support with Children's services, building on the successful Tots2Teens and Kids Camp models

Action Plan Point	Status	Progress Update
		<ul style="list-style-type: none"> - Supporting the work as part of the emerging Integrated care System for health and social care to define 'place' and encourage more locally made decisions closer to communities. - Develop a wider understanding of the profile and needs of domestic abuse and to draw as much resource as possible into prevention within the locality
Further scoping of a Community Hub model, utilising existing community assets in our areas	Not started	A paper is due to be received by Cabinets in Q2 of 21/22
Develop a predictive tool which helps us to understand demand levels for key Community Hub services	Complete	Demand work has been undertaken to predict and develop mitigation planning for housing, benefits and community hub teams, based upon possible waves of the pandemic and the economic downturn. This work will continue to be reviewed as the external environment evolves.

COMMUNITIES - Support our individuals and families through an effective Hardship Offer

Action Plan Point	Status	Progress Update
Short Term		
Work closely with key partners such as the housing sector and County Council to ensure there is an effective approach in the short term to meet needs of vulnerable individuals	Complete	<p>A robust operating model of support has been put in place to allow the councils to meet higher levels of need through the various periods of lockdown, which has included:</p> <ul style="list-style-type: none"> - Proactive communication with our 6,800 in Broadland and 7,000 in South Norfolk clinically extremely vulnerable population to ensure adequate support through the various periods of required shielding - Increased temporary accommodation capacity from a typical baseline average of 30 up to 60 at a peak across both districts, using our private rented stock and additional capacity at the former RAF mess at Coltishall. - Hardship funding and council tax support being made available for those who need it - The provision of 1,900 food parcels to residents in need - Supported 1,600 individuals or families in total with food needs (including deliveries to shielding population and food vouchers)
Continue to utilise partnerships with the Help Hub to ensure those in hardship are supported to become independent	Complete	See above
Medium Term		
Review opportunities for a County wide model for high needs accommodation	Ongoing	<p>The establishment of a Strategic Housing Board for Norfolk has provided a platform for a more cohesive approach to supporting complex cases, building on the great work undertaken across Greater Norwich.</p> <p>Locally, a Housing First model, working with Clarion Housing and Norfolk Public Health is being rolled out having successfully attracted over £1m of Government funding which will provide up to 10 single bed flats to support the most complex housing cases across the districts</p>
Provide support to help people back into employment including	Ongoing	Work has started to roll out both the government's Kickstart offer, with SNC and BDC acting as a gateway employer for up to 35 young people.

Action Plan Point	Status	Progress Update
skills development and encouraging apprenticeships and work placements		<p>The council is working alongside the DWP to roll out the Jobs4All programme which helps to align those who are unemployed and in receipt of support from the council to support with finding employment.</p> <p>Further work to understand the impacts of the economic downturn and develop skills and training support is underway.</p>
Long Term		
Secure longer-term resilience of our Hardship Offer through a review of our internal systems and policies	Not Started	Work to commence in 21/22 as the effects of the economic downturn become clearer.

ORGANISATION and GOVERNANCE - Secure our finances through transformation and commercialisation

Action Plan Point	Status	Progress Update
Short Term		
Closely monitor the Councils finances and the impact of Covid-19	Ongoing	Cabinet and Full Council has received regular updates on the Councils response to the pandemic. These include budget and service impact updates. Further dates will follow.
Continue to work alongside our Local Government partners to lobby Central Government for stable and fair funding to cover the cost pressures on Councils	Ongoing	Leader and MD actively engaged in the Norfolk Engagement Board where decisions re distribution of government grant including COMF are agreed.
Support the commercialisation agenda through the production of clear business cases to allow Councillors to make informed decisions.	Ongoing	Businesses cases are produced for significant projects eg the waste LATC. The Spark Programme is also intending to roll out a new project management framework for projects.
Explore new avenues for South Norfolk's Leisure service offer and income, including developing innovative ways of extending our offer both to make sure that opportunities to maximise income and extend the leisure offer to as many as possible	Ongoing	<p>A strong marketing and pricing campaign based on customer segmentation has led to good re-uptake of approx. 1,700 members, including over 200 new members, upon reopening at a reduced capacity</p> <p>Significant investment in, and strong external verification of COVID secure arrangements in centres ensure the safety of customers and staff</p> <p>The development of a paid for online services to allow ongoing engagement of members and the support of residents to be healthy whilst in lockdown</p> <p>Introduction of a commercial recovery board, including external and independent sector advice, to oversee the development of leisure over the medium term and delivery of an operational cost neutral service against an agreed 3 year subsidy package, demonstrating strong commitment by the council to continuing to provide a good and accessible leisure offer to residents.</p>
Deliver a report to Councillors on how new ways of working for the One Team can enable an enhanced customer offer, use of space effectively and efficiently, reducing the carbon footprint,	Ongoing	A report on accommodation and how to make the most of new ways of working is progressing.

Action Plan Point	Status	Progress Update
maximising the use of technology and developing an agile approach.		
Medium Term		
Production of the 20/21 budgets and medium-term financial plans, reflecting the longer term impact of Covid-19 on the Councils finances.	Ongoing	20/21 Budget approved. The medium term financial plans have been updated to reflect our current understanding of the long term financial pressures.
Re-introduce existing and new leisure services, in accordance with evolving governmental advice, ensuring a safe environment is created	Complete	A clear roadmap for reopening has been established and enacted after each lockdown, including both indoor and outdoor products, with strong external audit of our COVID security members The development of the online leisure offer has offered opportunities to continue to grow both as additional capacity to our physical offer, but also to grown niche products such as online yoga and personal training, and opportunities to link to
Continue to expand our outdoor leisure offer	Ongoing	See above
Long Term		
Review the Councils development company structures to ensure they can deliver the number of properties in line with the aims and ambitions of the companies in order that they can deliver a return to the Councils	Ongoing	-

ORGANISATION and GOVERNANCE - Secure Reimagine our service delivery and ways of working

Action Plan Point	Status	Progress Update
Short Term		
Reset of our 2020/21 Delivery Plan to ensure that it reflects the changing nature of service delivery and new priorities for the districts.	Complete	Updated 20/21 Delivery Plan reviewed and approved by Cabinet and Council,
Review our Transformation Programme in line with the update to the Delivery Plan.	Ongoing	Some of our transformation resource has been redeployed to support the Covid response. However, we have continued to progress with key transformation projects.
Delivery of IT equipment which enables our staff to work in a more agile manner and improve the service of our customers, this includes: a single telephony solution, laptop roll out (where appropriate) and the implementation of a joint Office 365 solution (includes Members)	Ongoing	Single telephone solution implemented. Laptops roll out almost complete. Implementation of Office 365 will be complete by early Summer.
<p>Ensure our staff are able to perform to the best of their ability by:</p> <ul style="list-style-type: none"> • Ensuring the One Team Managers are trained to provide support for their staff and to identify and assist any wellbeing concerns • Upskilling Managers in managing staff remotely • Increasing the number of staff who are trained as Mental Health First-Aiders • Revisiting our recruitment and on-boarding process for new staff 	Complete	All measures now in place and there is an ongoing programme of promoting the various measures and options available to staff and managers.

Action Plan Point	Status	Progress Update
during this period of social distancing and remote working <ul style="list-style-type: none"> Continuing to implement the Wellbeing Action Plan 		
Medium Term		
Improve our service offer by providing more services and appointments online to improve customer service and reduce the need for customers to travel to a physical location.	Ongoing	Implementation of the Reopening to our Customers Project will apply from 12 April when Public Buildings can reopen to the public.
Ensure that our opening hours are reflective of the needs of our community and extend our offering through the availability of a 24/7 digital self-service.	Ongoing	Availability of services through COVID response have flexed to meet needs, with extended availability during the day and over weekends during lockdown and to enable contact tracing and isolation support
Utilise IT to support locality working to provide improved accessibility to services.	Ongoing	The move to home enabled working and the rollout of laptops provide a solid foundation for locality working.
In line with social distancing guidelines and in consultation with members, continue to run Committee Meetings virtually and live stream these to ensure transparency of decision making.	Ongoing but will end in May 21.	Virtual council meetings in England are to end in May after the Government said it was under too much pressure to fit in legislation to allow the temporary law to continue.
Long Term		
Deliver the 5-year IT investment programme to release efficiencies through removing duplication of IT systems.	Ongoing	The key focus at present is the updating and joining together the underlying core IT infrastructure. Once this is complete, we will move onto consideration of joint software systems in order to deliver efficiencies.

ECONOMY - Support every business to drive the growth of the economy and employment

Action Plan Point	Status	Progress Update
Short Term		
Support our businesses to survive and continue to operate, including the delivery of grant schemes where appropriate	Ongoing	<p>Paid out over £30.2m to South Norfolk businesses April to September 2020 and over £15m November 2020 to March 2021. Expect to pay another £4.6m in Restart grant first week of April 2021.</p> <p>Paid out over £25.7m to Broadland businesses April to September 2020 and £14.5m November 2020 to March 2021. Expect to pay another £4.4m in Restart grant first week of April 2021.</p>
Unlock business opportunities by utilising our regulatory powers to support small businesses where we can to set up and/or recover	Ongoing	We have provided advice and support to businesses looking to adapt their business models to respond to the effects of the pandemic, taking soundings with the trades affected and offering information and support to help businesses diversify lawfully and keep afloat. Officers have also offered licensing assistance to ensure that businesses can continue to trade lawfully under the imposed restrictions.
Support local businesses through reprofiling business rates payments and utilising discretionary business rates reliefs as appropriate	Ongoing	<p>Accepted requests to defer/reschedule payments due to Covid impact on finances of business.</p> <p>Where it is obvious that a premises has not been able to trade we have not been pursuing old arrears (they are generally in receipt of Expanded Retail Discount for the current year)</p> <p>Prolonged nature of lockdown resulted in enquiries from supply chain businesses that do not receive Retail Discount – we have been encouraging application for Additional Restrictions Grant and are also advising them of Hardship Relief.</p>
Review and progress our Capital Programme, with the view of supporting our businesses and economy in the future	Ongoing	<p>Engaged consultant to carry out an evaluation of strategically important sites to try and understand more precisely how public sector investment (&/or funding (via Homes England)) might assist in unlocking specific sites, as well as giving public sector investors a financial &/or economic development return.</p> <p>Work is ongoing looking at no fewer than 10 sites across Broadland & South Norfolk.</p>

Action Plan Point	Status	Progress Update
		Progressing plans to develop a Food Innovation Centre at Honingham.
Maintain an up-to-date overview of impacts and trends within our local economies to inform our support and services, working in partnership with key stakeholders	Ongoing	<ul style="list-style-type: none"> • Online business surveys running in conjunction with GYBC. • Weekly New Anglia LEP & Growth Hub Business Intelligence • County produced "Overview on Norfolk's Workforce, Businesses and Economy" • Norwich Economic barometer report • Information presented by applicant for discretionary business grants • Information gathered ongoing in Business Support telephone calls
Early engagement with the LEP skills board to understand the future skills needs within our Districts	Ongoing	<p>Fed into LEP Local Skills Report and LEP Workforce Development Plan. Attending LEP Workforce Workstream group and contributed to their delivery plan.</p> <p>Fed into plans for a range of local initiatives to increase participation in local apprenticeships and to support skills improvement within local small businesses.</p>
Explore the potential of working jointly with the LEP and DWP to support Education Accounts	Ongoing	Progressing conversation opportunities to explore recommendations contained in Skills for Jobs White Paper.
Continue to ensure that residents have access to employment support schemes and services	Ongoing	<p>Run choices programme. Choices is a programme for residents who are looking to improve their skills and confidence ready to return to the work environment. It is primarily aimed at those who have not worked for a while due to a variety of differing circumstances.</p> <p>Work4All employment support being offered.</p> <p>Kickstart placements also being offered with internal (12) and external positions (23) for young unemployed.</p>
Medium Term		
Support businesses to diversify into new areas where the market has changed	Ongoing	<p>Looking at Click It Local Scheme to evaluate potential for use.</p> <p>Provided additional funding to Norfolk County Council led Go Digital programme to help micro, small and medium businesses make better use of digital tools to help them grow.</p>

Action Plan Point	Status	Progress Update
		We are looking into the development of a portal for businesses with advice and guidance on reopening the high streets safely.
Promote the visitor economy in Broadland and South Norfolk	Ongoing	<p>Through the Norfolk Tourism Support Package funding, we have paid out funding via the Autumn & Winter Adaptions Fund, the Tourism Covid 19 Adaptions Grant, public realm improvements, and support for membership to local destination marketing organisations.</p> <p>Through the Tourism Best Practice Steering Group, the Tourism Action Plan Group collaborations, we have continued to provide campaigns, guidance and promotion for the area for tourism businesses and for potential visitors, for once lockdown has eased.</p> <p>We have successfully bid for funding for off season tourism infrastructure through the Norfolk Experience project (Innovation Incubator). NCC will now move forward with our application to install a star gazing and wildlife platform in the Broads to increase visitors in the Autumn/Winter.</p>
Develop an unlock service to resolve furlough issues and skills support to enable both continued trading and growth in the economy	Ongoing	We are currently revisiting our Skills & Training offer to ensure the best fit to the post-Covid local economy.
Restart the Disabled Facilities Grant and Warm Homes Fund, in line with Government guidelines, to support local tradespeople and supply chains	Ongoing	Additional funding has been secured to secure the expansion of the Disabled Facilities Grant. This includes Long Covid grant. Delivery of these grants is through a framework of local installers.
Facilitate business to business support, including clusters	Ongoing	<p>The Council continues to support fast growing business in key sectors of the local and global economy through facilitating the Greater Norwich Manufacturing Group and Finance Industry Group.</p> <p>With the planned Food Innovation Centre, we aim to set up a Food and Drink cluster group.</p>

Action Plan Point	Status	Progress Update
Review of how, working independently and in partnership, we can support and grow our businesses and economy long term		<p>A Steering Group of business representatives has been formed which will meet to inform the place-shaping narrative that will attract inward investment and jobs and help support existing businesses in the area.</p> <p>The Business Engagement Group will support the planned Food Innovation Centre which act as an incubator and help to raise the profile of the food and Drink cluster.</p> <p>Norfolk LA Economic Development Officers meet weekly to explore the opportunities to work collaboratively across Norfolk.</p>
Support business to buy local and promote social value in procurement by engaging with local businesses to ensure they have the opportunity where appropriate, to bid to supply the Councils with goods and services	Ongoing	<p>Tenders are advertised through Delta and available on the Government Contracts Finder webpage which is available to local companies and wider afield.</p> <p>The recently agreed Environmental Strategy includes an action to ensure that local enterprises are encouraged to bid for Council business.</p>
Long Term		
Investigate new approaches which strengthen the economies of our areas and support businesses to diversify and innovate	Ongoing	<p>The Councils are looking to engage consultants to assist in the development of an Economic Development Strategy which will take into account and respond to the impacts of the pandemic.</p> <p>High Potential Opportunity secured in March from Department for International Trade for Food and Nutrition on the Norwich Research Park – aims to support more national/global inward investment into the area.</p>
Continue to unblock constraints to growth through delivering and supporting infrastructure projects which will help to transform our areas including the Long Stratton bypass, Norwich Western Link road and the dualling of the A47	Ongoing	<p>Continue to have regular meetings with the County Council to support the delivery of Long Stratton by-pass and progress and determine the Long Stratton planning application.</p> <p>Continue to work with stakeholders to support the delivery of county wide infrastructure projects.</p> <p>Support the Cambridge Norwich Tech Corridor to campaign and raise awareness of the strengths within the region. We're also strengthening the collective portfolio of delivery through the Norfolk Strategic Infrastructure Plan.</p>

Action Plan Point	Status	Progress Update
Encourage the adoption across Norfolk of a common set of Contract Standing Orders and procurement processes, to assist local businesses in responding to tenders for public sector contracts by reducing the bureaucracy	Ongoing	There are joint Contract Procedure Rules (new name for Contract Standing Orders) for BDC and SNC, and similar rules for Great Yarmouth. We are currently working with Breckland to consider procurement opportunities more widely across Norfolk.

ECONOMY - Create clean, safe and vibrant public spaces

Action Plan Point	Status	Progress Update
Short Term		
Continue to take the necessary steps as part of our 'Confidence Campaign' to promote our market towns and high streets and to encourage people to visit and transact with our businesses	Complete	The Confidence Campaign was rolled out across market towns and retail areas in both districts.
Utilise our licensing powers to support key business impacted by the pandemic to recover e.g. the hospitality sector	Complete	Officers have also offered licensing assistance to ensure that businesses can continue to trade lawfully under the imposed restrictions.
Continue engagement with the community to inform the measures being taken in our high streets and market towns	Ongoing	Kept under review the measures put in place in the Confidence Campaign to ensure they meet the evolving needs of the local business community. Continued engagement with business community on "Pleased to see you" plan for reopening the high streets.
Medium Term		
Deliver key community events and community based-leisure activities with key partners, in line with government guidance to support the creation of vibrant public spaces	Delayed	Put on hold due to current restrictions.
Continuously review and improvement of our measures to ensure clean, safe and vibrant public spaces	Ongoing	Working with Town and Parish Councils on public realm improvements, signage, marketing and provision of hand sanitisers.
Long Term		
Work with local communities, businesses and Councils to ensure the vitality and vibrancy of our market towns and key service centres	Ongoing	Secured funding through Norfolk Strategic Fund to improve public realm in Harleston and to deliver business support programmes across Broadland.

Action Plan Point	Status	Progress Update
Review and consider the vision and future role of our market towns and highstreets and how we will play a role in leading the change required	Underway	Development of an Economic Development Strategy and Market Towns Strategy will identify priorities.

Appendix C: Allocation of Un-ringfenced Covid Monies to Support Our Services

Members agreed to allocate the Un-ringfenced Covid Monies as follows:

Emergency Committee 22 May 20

- To create an emergency budget of **£100,000** for market town work / supporting businesses.

Emergency Committee 5 Jun 20

- To create a general 20/21 Covid 19 emergency budget of **£250,000** to provide additional resource to support the Council's response to Covid 19.
- To create a housing 20/21 Covid 19 emergency budget of **£250,000** to meet the ongoing need for homelessness housing costs.
- To put aside **£256,000** to cover the cost of additional Council Tax Support.
- To note that reductions in Council Tax collection rates were estimated to result in **£154,000** in lost income.
- To set aside **£50,000** to cover potential cost of awarding additional Discretionary Housing Payment (DHPs).
- To set aside **£100,000** to cover the additional cost of awarding £150 council tax support to all working age Council Tax Support claimants.

Cabinet 24 August 20

- To allocate **£150,000** to the Norfolk Wide Fighting Fund.

Cabinet 2 November 20

- To increase the budgetary provision for Covid 19 expenditure from £250,000 to £305,000 to cover additional **£55,000** regulatory expenditure.

Cabinet 7 December 20

- To increase the general 20/21 Covid 19 emergency budgets by **£450,000** to provide additional resource to support the Council's response to Covid 19.
- To increase the housing 20/21 Covid 19 emergency budget by **£50,000** to meet the ongoing need for homelessness support.

Appendix D: General Un-ringfenced Covid Monies to Support Our Services Further Breakdowns

1.1 Breakdown of £681k spend on General Expenditure.

	£
Additional agency support to housing team	25,000
Leisure Reopening	54,100
Staff Reallocation (Leisure team)	297,439
County Wide Mailshot	28,636
High Street Works Staffing	3,274
At Work consultants	8,250
Cries Consulting	18,546
Telephone allowance	813
Other miscellaneous costs	72,540
Staff Travel	22,785
Depot Costs	114,613
IT/Software	35,117
	681,113

Nb: Year-end accounts are currently being finalised, so above figures may still be subject to change.

1.2 Breakdown of £344k committed on General Expenditure.

			£	
Programme Project Managers	Consultant 2 days a week	HR	7,260	
Programme Project Managers	No one currently in post	HR	13,750	Will only be called upon if need arises
Programme Project Managers	No one currently in post	HR	13,750	Will only be called upon if need arises
Housing Solution Officer	Officer in post	MP	16,957	
Housing Solution Officer	Officer in post	MP	18,150	
Housing Solution Officer	Officer in post	MP	18,150	
Community Hub - surge resource	Been using redeployed leisure staff	MP	32,450	Will only be called upon if need arises
Food and Safety	Struggling to recruit to role	NH	27,500	
Eco Dev Admin Post	Officer in post	TA	2,827	
Property Surveyor	Work expected in 21/22	TA	36,630	
Senior Eco Dev Officer	JD currently being graded	TA	27,500	
HR admin support	Officer in post	EH	13,824	
HR ABP	Officer in post	EH	5,865	

			£	
IT Trainer	Currently Recruiting	EH	9,075	
Electoral Services Officer	Needed for May elections	EH	6,600	
NNDR	Temp (8 weeks)	RF	1,058	
Kettringham Depot	Hire cars at £7,500 per month	SP	22,500	
Kettringham Depot	Contingency for hire of up to 12 agency staff to cover loss of 4 crew	SP	70,000	
			343,845	

1.3 Snapshot of what the redeployed staff have been supporting (SNC element only)

	April-July		Nov		Jan - March		Total cost £'000
	Total FTE	Total cost £'000	Total FTE	Total cost £'000	Total FTE	Total cost £'000	
Funded from Un-ringfenced Covid Money							
Community Runners	14.1	84	3.5	10			94
Hub Inbound Calls	14.7	81	3.5	10	2.8	17	107
Housing			1.4	4	3.3	13	17
Housing - HSO Vacancy			0.7	2			2
Marketing & Comms			1.6	5	16.9	4	9
Economic Growth			2.0	8			8
Facilities	2.8	13	1.4	4			17
HR			1.1	3	1.4	7	10
Foodbank			0.7	2	1.3	7	9
IT	1.4	9	1.4	4	0.6	2	14
Council Tax	0.7	5					5
	33.8	192	17.3	50	26	49	291
To be recharged to Partners							
School Testing					0.4	2	2
NHS					16.9	33	33
School Testing							-1
NHS							-14
					17.4	35	20
Funded from Waste Budgets							
Waste	11.3	26	3.3	9	10.4	50	85
	11.3	26	3.3	9	10.4	50	85
Funded from COMF Money							
Track & Trace					2.0	11	11
					2.0	11	11
Overall Total	45.0	218	20.6	60	56.0	145	407

Appendix E: Provisional Indication of how COMF Money will be utilised

Scheme	Description	COMF Rationale	Allocation
Communities			
Extending the COVID Support Advisor Service	Currently funded to Nov 21, this will extend the service to Mar 22, to continue the same activities of isolation support, enhanced contact tracing and community and business engagement	<ul style="list-style-type: none"> • Additional contact tracing. • Enhanced communication and marketing (e.g. towards hard-to-reach groups and other localised messaging). • Delivery of essentials for those in self-isolation. 	£144k
Engagement Officers	2 fte officers to engage with BAME and other 'hard to reach' groups who tend to be over-represented in large scale employment settings such as meat processing etc. Proposal is for 1 fte in each district to work with existing representative groups and seek other routes into marginalised communities to encourage engagement with Hub services, COVID testing and the vaccination programme. Address issues of testing and vaccine hesitancy in order to promote the Council welfare offer, mitigate the impact of self-isolation and encourage preventative measures to address risk of infection. This would be managed within the existing Covid management structure	<ul style="list-style-type: none"> • Community-based support for those disproportionately impacted such as the BAME population. 	£30k
Development and Call Down from COVID Bank Staff or Agency	Administration costs and resource to call in additional CSA or administrative resources as needed and in response to significant external requests (for example a significant outbreak, a surge in contact tracing demand, surge in increases of ASB etc), allowing the councils to be well placed to respond flexibly to the needs of the community and businesses	<ul style="list-style-type: none"> • Additional contact tracing. • Enhanced communication and marketing (e.g. towards hard-to-reach groups and other localised messaging). • Delivery of essentials for those in self-isolation. 	£28k

Scheme	Description	COMF Rationale	Allocation
Communities			
Extended Hospital Discharge	To enable the timely discharge of patients in community 'discharge to assess' beds where the blocker is a housing related issue, freeing capacity back into the NHS and enabling a COVID secure discharge. This is in addition to the mainstream District Direct Service	<ul style="list-style-type: none"> • Additional resource for compliance with, and enforcement of, restrictions and guidance 	Nil
Improving infrastructure and support to Mutual Aid groups	Money to help establish and bankroll a CIC which will exist to support and provide funding opportunities for the Mutual Aid groups the council has been working with throughout the pandemic, and continue to support their vital community support role.	<ul style="list-style-type: none"> • Delivery of essentials for those in self-isolation. • Harnessing capacity within local sectors (e.g. voluntary, academic, commercial). 	£10k
Young Person Mental Health Support Worker(s)	Provision of 1 fte Young Person Mental Health Support Workers – 1 for each district for 12 months – provision of a holistic and responsive early help offer to young people experiencing common mental health problems/deficits in wellbeing specific to isolation and family tensions. This service would be commissioned through a VCSE provider which will ensure that elements of management and practice supervision of staff are in situ and therefore there is no additional demand on Council resources.	<ul style="list-style-type: none"> • Delivery of essentials for those in self-isolation. • Community-based support for those disproportionately impacted such as the BAME population. 	£47k
Whatever It Takes Grant	An additional tool for officers to use to enable people to remain in their existing accommodation, thus reducing transiency and additional placements in temporary accommodation whilst ensuring stability for those at risk of losing their homes	<ul style="list-style-type: none"> • Delivery of essentials for those in self-isolation. • Additional resource for compliance with, and enforcement of, restrictions and guidance 	£25k

Scheme	Description	COMF Rationale	Allocation
Communities			
Business and Regulatory			
Increased Licensing Team Capacity	Temporarily increase capacity by recruiting an additional Licencing Team Leader to enable greater EHO support to manage outbreaks in workplaces and providing COVID security advice alongside the HSE	<ul style="list-style-type: none"> • An additional temporary Licensing & Enforcement Officer plus a small addition to Licensing team leader working hours, to enable delivery of high demands for Licensing to support community and business recovery 	£20k
Reopening the High Street Awareness Campaign	Promotion of COVID safe reopening for businesses and welcoming the public back into their local shops, to encourage ongoing compliance and positive behaviours.	<ul style="list-style-type: none"> • Additional resource for compliance with, and enforcement of, restrictions and guidance 	£25k
Broadland and South Norfolk COVID Safe Business Awards	Following market testing with businesses in Broadland and South Norfolk a COVID safe certification process is proving a popular proposal amongst our business sector. This will promote both higher standards of COVID controls on business premises and public confidence as high streets and commercial areas re-open.	<ul style="list-style-type: none"> • Additional resource for compliance with, and enforcement of, restrictions and guidance 	£10k
Anti-Social Behaviour Support	4 x FTE additional CSA roles to support the growing levels of anti-social and nuisance complaints into the regulatory function, to help provide information and guidance and help triage the regulatory cases	<ul style="list-style-type: none"> • Additional resource for compliance with, and enforcement of, restrictions and guidance 	£60k
			£399k

THE DEBT RESPITE SCHEME (BREATHING SPACE AND MENTAL HEALTH CRISIS MORATORIUM) REGULATIONS 2020 & STATUTORY DEBT REPAYMENT PLAN (FINANCIAL SERVICES BILL) – REQUEST FOR ADDITIONAL RESOURCE

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Portfolio: Finance and Resources

Ward(s) Affected: All

Purpose of the Report:

This report outlines the additional demand that we expect to result from the introduction of Breathing Space Regulations and the Statutory Debt Repayment Plan, and requests temporary additional resource in the Recovery team to deal with the resulting workload.

Recommendations:

1. To increase the Recovery Team capacity by 1 x FTE for a period of 18 months to deal with work arising from the impact of the new Breathing Space and Statutory Debt Repayment Plan regulations in Broadland and South Norfolk. The cost to be shared 45/55 between BDC / SNC in line with the one team agreement.

1. Summary

- 1.1 The Debt Respite (Breathing Space) Regulations come into force on the 4th May 2021. The regulations will provide eligible debtors with legal protections from their creditors, including the halting of additional charges and enforcement action.
- 1.2 The Statutory Debt Repayment Plan (SDRP) will shortly follow this. This will provide debtors with a formalised and legislated plan to repay their debts over an extended period.
- 1.3 The implementation of Breathing Space and a Statutory Debt Repayment Plan was a 2017 conservative manifesto commitment. The intention is to give people in problem debt a chance to take control of their finances and put them on a sustainable footing.
- 1.4 The Council needs to be prepared for the impact of this to ensure we are fully compliant. Both changes will require additional resources to administer otherwise the existing level of service provision, and levels of debt recovery could be significantly impacted.
- 1.5 As an existing and established primary point of contact for debtors, the Recovery team will be best placed to administer and ensure compliance with the regulations.
- 1.6 The Recovery team is currently comprised of 4 x FTE's (including 1 FTE team leader) and 1 temporary FTE agency worker. Based on the research and findings below it is the firm belief that the existing resource will not be sufficient to cope with the demands of these regulations without significant detriment to the team's primary function.
- 1.7 There is currently no intention to award any new burdens funding to local authorities for Breathing Space or the SDRP.

2. Background

- 2.1 The Council takes a firm but fair approach to debt recovery. It achieves high levels of collection, but also ensures that when residents genuinely have debt issues the Council works with them to ensure they are able to access financial support as appropriate.
- 2.2 The Debt Respite Scheme (Breathing Space) Regulations will provide residents in debt with the right to legal protections from their creditors. The protections include pausing enforcement action and contact from creditors and freezing interest and charges on their debts.
- 2.3 There will be two types of Breathing Space moratorium. The standard moratorium period will last for 60 days, however for those that are receiving mental health crisis treatment the moratorium will last indefinitely until such time as their treatment has ended.

- 2.4 As a creditor, when the Council is told that a debt owed to us is in Breathing Space, we will be mandated to stop all action related to that debt and apply the protections provided within the regulations.
- 2.5 Breathing Space and the SDRP will be administered by the Insolvency Service via an electronic service that is to be maintained by the Secretary of State. The Council will receive notifications from debt advisors via e-mail to tell us when a debtor has entered into a Breathing Space.
- 2.6 If the Council does not comply with the regulations as soon as is reasonably practicable the Council will be liable for any losses caused to the debtor or the creditor by assignment. In effect, this means if we fail to identify debts and stop action on them within a reasonable time we will not be able to recover them, and we may be liable for charges from our Enforcement Agents if we cause them not to be able to collect their fees.
- 2.7 Failure to comply promptly could also lead to Ombudsman action and Judicial Review.
- 2.8 The Statutory Debt Repayment Plan (SDRP) will enable an individual in problem debt to enter into a formal agreement to repay their debt over a manageable period of time. The plan would be a significant intervention, changing the profile of a debtor's repayments over time and ceasing all enforcement action by creditors against a debtor during that period. The SDRP will in effect be a legally binding, formalised Debt Management Plan.
- 2.9 This is being introduced as an additional debt solution alongside the existing suite of solutions which includes Debt Relief Orders, IVA's and Bankruptcy which the Recovery team already deal with on a regular basis. The SDRP will differ from these solutions in that it is not a form of insolvency and therefore it is likely to be more appealing to many debtors than the current options.

3. Current position/findings

- 3.1 The Governments impact assessment predicts that 800,000 debtors will enter into a Breathing Space moratorium within the first year, rising to 1.3 million. This equates to 1.8% of the adult population in the first year. Based on this data we can expect up to an additional 2,022 customer contacts for South Norfolk and 1,919 for Broadland.
- 3.2 **Appendix 1** shows that these figures predict an initial caseload of up to 15 per day in the first year. Taking consideration of a rising population and a predicted year on year rise of take-up, the caseload is highly likely to increase as time goes on.
- 3.3 The Breathing Space & SDRP will be created by the debt advisor but the burden of administering it will fall with the Council and will require significant manual intervention to ensure it is implemented correctly across all of the person's debt, which may span several departments. We will also be responsible for monitoring

and distributing dividend payments received across all of the person's individual debts.

- 3.4 There will be a necessity to continually monitor accounts that are subject to a SDRP as many of these debts will be subject to change due to benefit adjustments, liability changes, discounts and exemptions etc. The Insolvency Service need to be informed of the changes in a reasonable time so that the SDRP can be amended accordingly.
- 3.5 The vast majority of residents that access Breathing Space and the SDRP will have a Council Tax liability, and any Council Tax liability from reminder stage onwards can be included in a Breathing Space and SDRP. We currently have a total of 10,924 cases that could potentially be included.
- 3.6 The majority of households will also have ongoing liabilities to Council Tax; therefore, these will need to be monitored to ensure we are offering the appropriate support to people that we know are in financial difficulty. The Recovery team will be heavily involved in these cases by default and therefore it follows that the co-ordination and administration of Breathing Space and the SDRP will be best placed with the Recovery team.
- 3.7 To ensure compliance with Breathing Space regulations, the Recovery team will need to process and respond to these notifications on a daily basis. This will involve liaising with other teams to ensure that all debts are identified and that the protections have been applied for each debt, including those with external Enforcement Agents. It will also be necessary to update the Insolvency Services online portal for each case.
- 3.8 The recovery team at present is small with a total of 4 x permanent FTE's (including 1 FTE team leader) and one temporary FTE agency worker that is being funded by Norfolk County Council until June 2021. The team is already experiencing pressure from an increasing workload and increasing telephone contact as a direct result of the pandemic and the disruption this has caused to our usual recovery process. As evidenced below, this workload is going to continue increasing as we look to make up lost ground, and the introduction of Breathing Space and the SDRP will be a significant additional burden.
- 3.9 The figures in **Appendix 2** show the results of the Council being unable to hold court hearings due to the pandemic. For SNC, 823 of 2020/21 liabilities are at a recovery stage (post liability-order), compared to 1,756 of 2019/20 liabilities. A similar decline has been seen at BDC, with 1,061 of 2019/20 liabilities cases being at a recovery stage by the end of 2019/20, compared to only 615 for the current year.
- 3.10 This is a direct result of court hearings being suspended – BDC were only able to issue 1,151 summonses in 2020/21 compared to 2,761 in 2019/20. SNC were only able to issue 829 summonses in 2020/21 compared to 5,467 in 2019/20.

- 3.11 This is further reflected in our current collection rates. As at the end of February 2021 BDC was over £300k down on Council Tax collection compared to the same time in 2020 with SNC £480k down.
- 3.12 Based on the current trend we can predict a final rate of 98.4% for BDC and 97.8% for SNC. This equates to a total of £3.5 million in arrears from 2020/21 which will need to be collected through increased recovery action next year (£1.4m for BDC & £2.1 for SNC).
- 3.13 **Appendix 3 (a)** shows a clear correlation between workload and recovery activity with the outstanding workloads for each authority rising significantly in the weeks surrounding the Liability Order hearings on 21st Jan and 25th Feb 2021.
- 3.14 **Appendix 3 (b)** shows a spike in the number of calls received by the recovery team in the days leading up to, during and following the January court hearing, and this is indicative of future trends as we move forward with increased recovery action to make up for the losses of 2020.
- 3.15 Taking the above points into consideration, alongside the financial difficulties that many people and businesses are facing as a direct result of the pandemic, it is clear that the Recovery teams workload is going to continue increasing in number and complexity as we make up for lost ground, and this will coincide directly with the introduction of Breathing Space and the SDRP.
- 3.16 The recovery team not only enforce debts but are also a main point of first contact for vulnerable residents that need various forms of support. Therefore, it is already integral for them to regularly spend time liaising with the Help Hub, benefits departments, debt & money advisors and other external agencies to reach the best solution for the Council and its residents.
- 3.17 This demand will be exacerbated by Breathing Space and the SDRP as the contacts generated from this will solely be problem debtors, therefore it is important to ensure this channel of communication with our residents is kept open, efficient and responsive. The team must be adequately resourced in order to achieve this.
- 3.18 As of March 2021, there is a total of £2.5 million that the recovery team are responsible for collecting for prior years up to and including 2019/20 (£1.6m for SNC & £864,000 for BDC) not including the significant arrears that will be carried over from the current year. This shows that the primary function of the recovery team is an important part of the Councils income stream and failure to plan ahead to meet these new demands will lead to a decline in the level of service we are able to provide, which will have a knock-on effect on collection rates.
- 3.19 It is difficult to know exactly what the new caseload will be until the regulations are implemented, but it is apparent that resource will be required to deal with the increased demand.

4. Proposed action

- 4.1 Based on the forecasted additional demands and increased workload described above, this report proposes funding an additional 1 x FTE recovery officer at Band C for a period of 18 months. This would have a total cost of £41,640 (£33,856 + on costs). The cost for SNC would be £22,902 (55%) and the cost for BDC would be £18,738 (45%).
- 4.2 This would allow us to assess the impact of the regulations without causing our recovery rate to suffer.
- 4.3 Once the impact is better known, we can review the need for additional resource as appropriate.

5. Other options

- 5.1 Do nothing – we could try and absorb the new burden within our existing capacity; however, this is likely to be significant and effect service provision.
- 5.2 Agency staff could be utilised, however as the additional burden is going to be permanent this would not be cost effective in the long-term.
- 5.3 Increase resource on a 12 month basis, however it should be considered that a significant amount of training will need to be given which could take up to 4 months to complete.

6. Issues and risks

- 6.1 **Resource Implications** – The proposal would have a cost of £41,640 (£33,856 + on costs). The cost for SNC would be £22,902 (55%) and the cost for BDC would be £18,738 (45%).
- 6.2 **Legal Implications** – We have a legal obligation to fully comply with Breathing Space regulations in a timely manner and failure to do so could result in Judicial Review or Ombudsman action.
- 6.3 **Risks** – If we do not increase resource in anticipation of the increased workload there is a risk of our debt recovery team not being able to carry out its primary function effectively, which would negatively impact the Councils income stream and also negatively impact our residents as we may not be able to offer the support that they need.

7. Conclusion

- 7.1 In conclusion the impact of Breathing Space and SDRPs is likely to be significant and action is required to make sure the Council can continue to provide recovery services to a suitable standard.

8. Recommendations

- 8.1 To increase the Recovery Team capacity by 1 x FTE for 18 months, to deal with work arising from the impact of the new Breathing Space and Statutory Debt Repayment Plan Regulations in Broadland and South Norfolk.

Background papers

None

Appendix 1

Predicted year one caseload, based on impact assessment and ONS population stats

		x 1.8%	per month	per week	per working day
BDC adult population	106,614	1919	160	37	7
SNC adult population	112,355	2022	169	39	8
<u>TOTAL</u>	218,969	3941	328	76	15
England adult population	44,263,393	796,741	66,395	15,322	3,064

Appendix 2

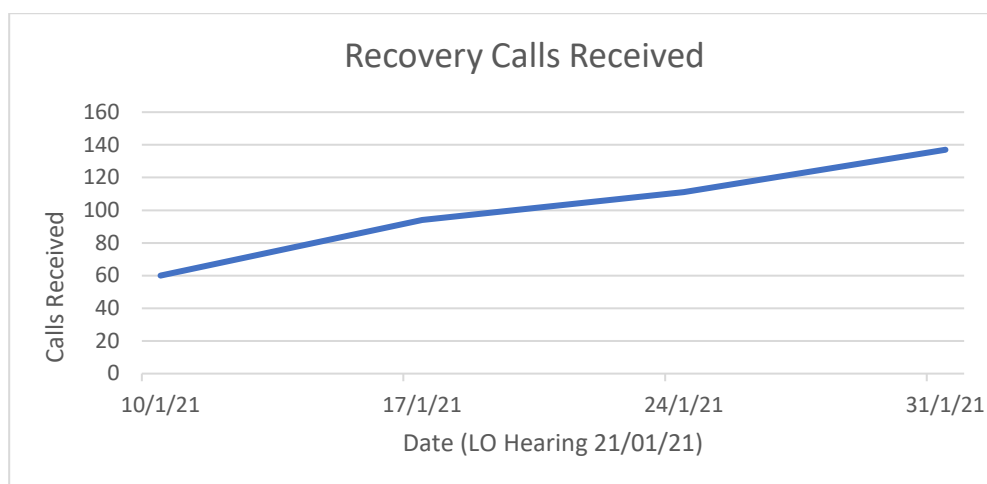
Cases at Recovery stages

	2019/20	2020/21	% Decrease
BDC	1061	615	42%
SNC	1756	823	47%

Appendix 3 (a)

Period		Totals	Totals
Week Commencing		BDC - RECOV Overall Work Outstanding	SNC - RECOV Overall Work Outstanding
11/01/2021		200	342
18/01/2021	Court Hearing 21st Jan	231	449
25/01/2021	Court Hearing 21st Jan	440	309
01/02/2021		286	340
08/02/2021		200	305
15/02/2021	Court hearing 25th Feb	220	622
22/02/2021	Court Hearing 25th Feb	217	522
01/03/2021	Court Hearing 25th Feb	473	557
08/03/2021		269	433

Appendix 3 (b)



REVIEW OF POLICIES

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Assistant Director Governance and Business Support
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Portfolio: Finance and Resources

Ward(s) Affected: All

Purpose of the Report:

The Counter Fraud, Corruption and Bribery Policy, Anti-Money Laundering Policy and Whistleblowing Policy have been reviewed and approved by the Audit Committee. The reports are presented to Cabinet for review and approval, prior to these being presented to Council.

Recommendations:

1. To recommend to Council the adoption of the:
 - Counter Fraud, Corruption and Bribery Policy
 - Anti-Money Laundering Policy
 - Whistleblowing Policy

1. Summary

- 1.1 The Counter Fraud, Corruption and Bribery Policy, Anti-Money Laundering Policy and Whistleblowing Policy have been reviewed and approved by the Audit Committee. The reports are presented to Cabinet for review and approval, prior to these being presented to Council

2. Background

- 2.1 It is good practice that policies are regularly reviewed, to ensure that they remain fit for purpose.
- 2.2 These existing policies have been reviewed, and the new policies are based on the latest best practice.

3. Current position

- 3.1 The policies were considered by the Finance, Resource, Audit and Governance Committee on the 5 March 2021 and were approved for adoption by Council, as this is where the Committee makes recommendations to and reports into.
- 3.2 The policies are therefore before Cabinet for completion and endorsement by the Executive, before these are finally presented to Full Council. The three policies are attached as appendices to this report.

4. Other options

- 4.1 Cabinet could either not accept the changes, which would result in the policies not being in line with best practice. Or Cabinet could propose amendments to the policies provided with this agenda.

5. Issues and risks

- 5.1 **Resource Implications** – ensuring that policies remain up to date helps ensure our governance framework remains in line with best practice.
- 5.2 **Legal Implications** – the policies have been compiled in line with best practice guidance and relevant legislation.
- 5.3 **Equality Implications** – not applicable to this report.
- 5.4 **Environmental Impact** – not applicable to this report.
- 5.5 **Crime and Disorder** – not applicable to this report.
- 5.6 **Risks** – there are no other risks to consider.

6. Conclusion

- 6.1 Cabinet are requested to recommend adoption of these policies to ensure that the Council remain in line with best practice and has in place a sound governance framework in this regard.

7. Recommendations

- 7.1 To recommend to Council the adoption of the:
- Counter Fraud, Corruption and Bribery Policy
 - Anti-Money Laundering Policy
 - Whistleblowing Policy

**SOUTH NORFOLK COUNCIL
COUNTER FRAUD, CORRUPTION AND BRIBERY POLICY**

1. Introduction

- 1.1 The Council wishes to promote a culture of openness and honesty consistent with the principles for conduct identified by the Committee for Standards in Public Life and expects all those who work for and with the Council to adopt the highest standards of propriety and accountability.
- 1.2 The Council recognises the need for a policy to prevent wrongdoing and to have in place a clear network of systems and procedures to assist in the prevention and investigation of fraud, bribery and corruption. The Council is committed to ensuring that these arrangements keep pace with developments, in both preventative and detection techniques, regarding fraudulent or corrupt activity that may affect its operation or related responsibilities.
- 1.3 The Council has an important role in ensuring that public services are provided efficiently, effectively and economically. In doing so, corporate governance arrangements need to address the risks posed by fraud and corruption to ensure that the Council is able to achieve its objectives.
- 1.4 Council staff and elected members are an important element in its stance on fraud and corruption. They are positively encouraged to raise any concerns surrounding activities associated with the Council's responsibilities. They can do this in the knowledge that such concerns will be treated in confidence, properly investigated and fairly dealt with.

2. Who This Policy Applies To

- 2.1 This Policy applies to all employees (including temporary and agency workers), elected members, contractors, suppliers, voluntary organisations and members of the public.

3. Definitions and Examples

- 3.1 The Chartered Institute of Public Finance & Accountancy (CIPFA) define fraud as "the intentional distortion of financial statements or other records by persons internal or external to the organisation which is carried out to conceal the misappropriation of assets or otherwise for gain."
- 3.2 With reference to corruption, CIPFA describes this as "the offering, giving, soliciting or acceptance of an inducement or reward which may influence the action of any person". We might usually term this as bribery – for example, if someone was to try to offer an incentive to ensure that a planning application was approved, or, conversely someone accepted or asked for something of material value from contractors, suppliers or persons in return approval to provide services / goods to the Council.
- 3.3 The legal framework for fraud and corruption is defined by a number of acts.

Primarily, the Fraud Act 2006 which establishes a criminal liability for fraud through either false representation, failing to disclose information or abuse of position. Section 17 of the Theft Act 1968 creates an offence of destroying, defacing, concealing or falsifying any account, record or document made, or required, for any accounting purposes. The Bribery Act 2010 makes it an offence to attempt to bribe someone, or receive a bribe where that may result in improper discharge of a public function.

3.4 While not an exhaustive list, below are some examples of fraud, bribery and corruption:

- Theft of Council property or services
- Evading liability for payment
- False accountancy, including the destruction, concealment or falsification of any account or record, or giving misleading, false or deceptive information
- Obtaining property by false pretences
- Misuse of office
- Bribery
- Working while on sick leave
- Falsifying time or mileage sheets
- Selling Council equipment inappropriately
- Failure to declare an interest
- Fraudulent tendering process
- Fraudulent property letting
- Fraudulently accepting any gift or consideration as an inducement for doing or refraining from doing anything in relation to Council business

4. Responsible Officers

4.1 The Senior Fraud and Inspections Officer is responsible for reviewing and updating the Counter Fraud, Corruption and Bribery Policy, along with making staff aware of the Policies requirements through training and publicising initiatives.

4.2 The Managing Director has overall responsibility for the Council's counter fraud, corruption and bribery arrangements. Directors, Assistant Directors and Service Managers support the Managing Director in this role; they are responsible for the prevention and detection of theft, fraud, corruption and other irregularities within their area of responsibility. They are expected to:

- Identify and assess the types of risks and fraud or corruption that might occur within their area.
- Promote the Strategy through publicity and relevant training of staff and bodies they do business with.
- Be alert for any indication of fraud or corruption.
- Be ready to take appropriate action in a timely way should there be a suspicion of theft, fraud or corruption.

4.3 The Section 151 Officer has a statutory duty to report where a decision has been made that would involve expenditure, or a loss, which is unlawful. This officer will also ensure the Council has adequate resources in place for the

provision of an Internal Audit Service that is able to provide an annual opinion on the quality of systems of internal control which inform the Council's Annual Governance Statement.

5. Review of Policy

- 5.1 This policy is to be reviewed at least every 3 years and the following parties will be consulted prior to approval:
- CMLT
 - Finance, Resources, Audit and Governance (FRAG) Committee.

6. How to Raise Concerns

- 6.1 Concerns can be raised in confidence and with the knowledge that they will be properly addressed.
- 6.2 Concerns should normally be raised with an employee's line manager, however if necessary a route other than a line manager may be used, as follows:

Managing Director	Trevor Holden mdtobdcandsnc@s-norfolk.gov.uk 01508 533601
Monitoring Officer	Emma Hodds ehodds@s-norfolk.gov.uk 01508 533791
Senior Fraud and Inspections Officer	Ian Kerrison ian.kerrison@broadland.gov.uk 01603 430406
Internal Audit Manager	Faye Haywood fhaywood@s-norfolk.gov.uk 01508 533873

- 6.3 All concerns raised and the outcomes will be reported to the Finance, Resources, Audit and Governance Committee annually in a form that does not endanger confidentiality. However, if no concerns are raised no report will be provided.

7. Members

- 7.1 All Councillors are expected to maintain high standards of Conduct when performing their public duties, and in particular to ensure compliance with the Nolan Principles of Standards in Public Life. The Monitoring Officer works with the Standards Committee to monitor standards of conduct and provide advice, guidance and training with both the legal requirements, and the Council's own expectations.
- 7.2 Members are provided a copy of the Code of Conduct, advice and guidance on the declaration of interests, gifts and hospitality, and protocols on Member / Staff behaviour and involvement in planning and other judicial matters.

8. Employees

- 8.1 The Council has put in place a number of policies, procedures and other actions to promote an anti-fraud culture to the Council's officers.
- 8.2 All officers must abide by the Council's Code of Conduct, which sets out the requirements on personal conduct. Professionally qualified officers of the Council are also expected to follow any Code of Conduct or Ethics as required by their Professional Bodies.
- 8.3 The Senior Fraud and Inspections Officer is responsible for Benefit and Corporate Fraud.
- 8.4 Any breach of conduct will be dealt with under the disciplinary procedures and may result in dismissal.
- 8.5 Officers must comply with the Code of Conduct in respect of the declarations of interests, and in particular declaring any financial or non-financial interests that could conflict with the Council's interests, or could cause conduct to be questioned.

9. Partners, Suppliers, Contractors and Other Organisations that the Council interacts with

- 9.1 The Council expects the highest standards from all organisations that have dealings with them. Any partners, suppliers, contractors and other third parties funded by or in receipt of payments from the Council are required to adopt or abide by Council policies, procedures, protocols, and codes of practice, where appropriate, in order to prevent and detect fraud.
- 9.2 All transactions with suppliers and other organisations will be entered into in line with the Council's Contract Procedure Rules. These make appropriate provisions for declaring interests and the circumstances where such regulations may not apply, and rules regarding entering into contracts and verifying contract conditions. In addition, prior to entering into significant, ongoing transactions, procurement procedures require that appropriate due diligence checks are undertaken to ensure that suppliers have an appropriate financial and risk profile before transactions are entered into.

10. Members of the Public

- 10.1 Members of the public have an important role to alert the Council to any concerns about the potential for fraud, corruption or bribery that they may become aware of. They are encouraged to report their concerns, either through the Council's complaint procedure or by contacting the relevant officers.

11. Internal Control environment

- 11.1 The Council's internal control environment plays a key role in ensuring that fraud can be prevented. Soundly designed systems, with adequate checks built in, minimises the opportunities for untoward activities. This could be

through automated controls, or through management oversight of transaction activity.

- 11.2 Management retains responsibility for the oversight of the internal control environment within their specific service areas. Internal and external inspections additionally play an important role in ensuring that operational arrangements are functioning effectively.
- 11.3 In the course of completing audit assignments; Internal Audit will separately identify fraud risks and determine what management control mechanisms have been put in place to address those risks and review their adequacy and effectiveness. Recommendations will be put forward aimed at strengthening systems of internal control which are designed to remove potential opportunities for fraud, corruption and error in the future. This also ensures that any concerns External Audit may have with regards to the risk of misstatement due to fraud and error is both sufficiently addressed and appropriate recommendations made and actioned where necessary.
- 11.4 The Council also recognises that a key preventative measure against the possibility of fraud or corruption is to take effective steps at the recruitment stage to establish, as far as possible, the propriety and integrity of potential employees. This includes temporary and contract staff. Agencies providing temporary staff will be required to confirm references have been obtained and validated.
- 11.5 Once recruited, employees are subject to an induction process. Similarly, upon election, members are also required to complete an induction. As part of this induction, members and officers are required to review the relevant Codes of Conduct.

12. Working with others

- 12.1 External Audit are charged with ensuring that the Council is correctly reporting its arrangements in relation to counter fraud, corruption and bribery. In the event that External Audit suspects a fraud, they will pass this over to Internal Audit for investigation, or in exceptional circumstances reserve the right to retain control over a fraud investigation.
- 12.2 Annually the Head of Internal Audit provides a response to the External Auditors. This provides information to assist the External Auditors in assessing the Council in relation to:
- Knowledge of any actual, suspected or alleged fraud affecting the Authority;
 - Views about the risks of fraud at the Authority;
 - Areas within the Council at greater risk of fraud;
 - Procedures used by Internal Audit to detect fraud; and
 - Management's response to any findings as a result of these procedures.
- 12.3 The Council participates, wherever possible, with exercises specifically developed to ensure that opportunities to identify instances and risks of fraud

are maximised. In this regard, the Council takes part in activities such as the National Fraud Initiative (NFI).

- 12.4 The Council participates in Single Person Discount reviews. In addition, the Council seeks to work with partners and other stakeholders to make the best use of resources and exchange information (subject to provisions of the General Data Protection Regulations and Human Rights Act) to minimise losses. Other partners include but are not limited to The Police, the Department for Work and Pension, Trading Standards, the National Health Service and other Local Authorities.

13. DETECTING AND INVESTIGATING

- 13.1 The Council expects its Senior Managers to be vigilant regarding the possibility of fraud or corruption occurring within their spheres of control. However, it is often the alertness of other employees, Councillors or members of the public that enables detection to occur and appropriate action to take place.
- 13.2 Despite best efforts some fraudulent activity or corrupt acts will be discovered by a chance “tip off” or via a “whistleblowing” incident. The Council has developed appropriate arrangements to enable such matters to be dealt with in a timely and appropriate manner.
- 13.3 Employees are required by the Rules for Financial Governance to report any suspicion they have that fraud or corruption has or may be about to take place. The Code of Conduct also advises them to report any aspect of the provision of service or behaviour of a colleague which might, if more widely known, bring the Council into disrepute.
- 13.4 Participating in activities such as NFI more readily helps the Council to identify where fraud has potentially occurred. The work of The Corporate Fraud Team, Internal Audit, and the Councils’ External Auditors may also lead to the detection of fraud.
- 13.5 The primary means of investigating fraudulent activity is through the Senior Fraud and Investigations Officer who is trained in Professionalism in Security (PINS) and has the necessary expertise to undertake investigations, and apply appropriate sanctions.
- 13.6 It is recognised in unusual situations that it may not be appropriate for the Corporate Fraud team to undertake an investigation. In these circumstances there are provisions in the Internal Audit Service contract to engage trained auditors. The Head of Internal Audit can be involved in such special investigations.
- 13.7 The Monitoring Officer is responsible for monitoring and ensuring the investigation of “Whistleblowing” concerns received. Where such cases involve an instance of fraud and corruption, these will need to be jointly overseen by the Monitoring Officer /Head of Internal Audit.
- 13.8 The Head of Internal Audit shall be responsible for the reporting of the

outcomes of non-housing and council tax support fraud cases to Council members, through providing updates in response to any cases that arise.

13.9 All reported cases will be handled in a fair and consistent manner. The Council will remain mindful of the legal framework governing the investigation of concerns, in particular:

- Freedom of Information Act 2000
- GDPR – General Data Protection Regulations 2018
- Human Rights Act 1998
- Criminal Procedures and Investigations Act 1996
- Police and Criminal Evidence Act 1984.

14. SANCTIONS AND REDRESS

14.1 Where it has been identified that fraud, corruption or bribery has occurred, the Council is committed to ensuring that all appropriate sanctions and courses of redress are undertaken.

14.2 Although the Council's primary means of sanction and redress of employees is through the Disciplinary Procedure, and members may be investigated through the Standards Committee; this does not preclude the Council taking additional action.

14.3 The Council will seek to work with other parties, in particular the Police, wherever necessary or appropriate. The Council has a PINS trained Officer who may seek to pursue cases through to conviction where appropriate. The Council has a public duty to seek financial redress, wherever feasible.

Release:	Draft SNC v1
Date:	12/01/2021
Author:	Ian Kerrison

SOUTH NORFOLK COUNCIL ANTI-MONEY LAUNDERING POLICY

Contents

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2. Scope of the Policy
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4. The Legal and Regulatory Framework and Obligations that it places on the Council

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5. The Money Laundering Reporting Officer
6. Reporting to the Money Laundering Reporting Officer
7. Customer Due Diligence
8. Training
9. Further Information
10. Review of the Policy

Appendix 1

How the Council may be exposed to Money Laundering

1. Guidelines to staff and members on concerns or suspicions
2. The types of activities that may be affected

Appendix 2

- Money Laundering Report Form
- Money Laundering Disclosure Form – to be completed by the Money Laundering Reporting Officer
- Customer Due Diligence Form – Private Individual
- Customer Due Diligence Form – Business

Effective Date – tbc

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ANTI-MONEY LAUNDERING POLICY

INTRODUCTION

1. Purpose and Rationale

- 1.1 The risks to the Council of contravening money laundering legislation are relatively low and some aspects of the legal and regulatory requirements do not apply to public authorities. However, it is recognised that Councils are not completely immune from the risks surrounding money laundering. For this reason, the purpose of the Anti-Money Laundering Policy is to clearly demonstrate that the Council embraces the underlying principles of money laundering legislation and is taking reasonable steps to minimise the likelihood of such activities occurring, by developing a suitable framework of arrangements to safeguard itself against action of this nature, whilst making satisfactory provisions to achieve compliance with legal and regulatory requirements, where appropriate.

2. Who does this policy apply to?

- 2.1 This Policy applies to all employees and members of the Council also to third parties who have suspicions of money laundering activities. **It is extremely important that all employees are familiar with their legal responsibilities and are vigilant at all times: serious criminal sanctions may be imposed for breaches of the legislation. The key requirement is to promptly report any suspected money laundering activity to the Money Laundering Reporting Officer (MLRO).**
- 2.2 Failure by any employee to comply with the procedures set out in this Policy may lead to disciplinary action being taken against them.

3. What is Money Laundering?

- 3.1 Money laundering is a term designed to cover a number of offences. These offences may relate to the improper handling of funds that are the proceeds of criminal acts, or terrorist acts, so that they appear to come from a legitimate source.

There are six main offences that may be committed under money laundering legislation, as established by The Proceeds of Crime Act 2002 (as amended by The Crime and Courts Act 2013, Serious Crime Act 2015 and the Criminal Finances Act 2017)

- Concealing, disguising, converting, transferring or removing criminal property from anywhere within Great Britain and Northern Ireland;
- Being concerned in an arrangement which a person knows or suspects facilitates the acquisition, retention, use or control of criminal property by or on behalf of another person;
- Acquiring, using or possessing criminal property;

- Doing something that might prejudice an investigation – for example, falsifying a document;
- Failing to disclose information relating to any of the above money laundering offences; and,
- “Tipping off” – informing someone who is, or is suspected of being involved in money laundering activities, in such a way as to reduce the likelihood of their being investigated.

These money laundering offences may be committed by an organisation or by individuals working for an organisation.

- 3.2 ‘Criminal property’ has a relatively broad definition in money laundering legislation and no financial ceiling has been specified, above which organisations are obliged to take action when money laundering activities are suspected. Benefiting from ‘criminal property’ can work on two levels, an individual benefiting financially from the proceeds of a crime they have committed themselves, or an individual benefiting from the proceeds of a crime/dishonest activities perpetrated by someone else. No matter how large or small the sum of money involved in these dishonest activities, the full weight of the money laundering legislation and regulations will apply regardless of the financial sums identified.

4. The Legal and Regulatory Framework and the Obligations that it places on the Council

- 4.1 The main laws and regulations which set out the money laundering regulations:
- The Proceeds of Crime Act 2002 (as amended by The Crime and Courts act 2013, Serious Crime Act 2015 and the Criminal Finances Act 2017)
 - The Terrorism Act 2000 (as amended by the Criminal Finances Act 2017)
 - The Money Laundering and Terrorist Financing (Amendment) (EU Exit) Regulations 2020
- 4.2 Under the Terrorism Act 2000, all individuals and businesses in the UK have an obligation to report knowledge, reasonable grounds for belief or suspicion about the proceeds from, or finance likely to be used for terrorism or its laundering, where it relates to information that comes to them in the course of their business or employment.
- 4.3 The Money Laundering and Terrorist Financing (Amendment) (EU Exit) Regulations 2020 establish that as long as businesses are not operating within the “regulated sector”, then the offences of failing to disclose suspicions of money laundering, and tipping off, do not apply. The list of businesses within the regulated sector does not include local authorities, and as such these offences do not apply to the Council.
- 4.4 The Chartered Institute of Public Finance and Accountancy (CIPFA) has issued guidance on how legal and regulatory provisions impact on public authorities. CIPFA has confirmed that local authorities are not a “relevant business” in terms of Money Laundering Regulations, and thus not required to have systems in place to identify, record and report money laundering.

However, CIPFA has also advised that ‘it is prudent and responsible practice for public service organisations, including those outside the scope of the regulations, to put in place appropriate and proportionate anti-money laundering safeguards and reporting arrangements, designed to enable them to detect and avoid involvement in the crimes described in the legislation and regulations.’ CIPFA guidance further emphasises that there could be a “substantial reputational risk for an authority which does not have such procedures in place”.

- 4.5 This Policy and the working practices aligned to it have thus been designed to address the risk the Council may face if it does not properly address the potential for money laundering. As a responsible authority, we need to be mindful that a money laundering offence could be committed by an employee, or the Council could be a victim of such an offence.

THE COUNCIL’S RESPONSE

5. The Money Laundering Reporting Officer

- 5.1 The Council has nominated the Senior Fraud and Inspections Officer as the Money Laundering Reporting Officer (MLRO). Their contact details are as follows:

Ian Kerrison
Senior Fraud and Inspections Officer
Broadland District Council
Thorpe Lodge
1 Yarmouth Road
Norwich
NR7 0DU
Telephone: 01603 430406
E-mail: ian.kerrison@broadland.gov.uk

In the absence of the MLRO, the Monitoring Officer is authorised to deputise for him and can be contacted as follows:

Emma Hodds
Monitoring Officer
ehodds@s-norfolk.gov.uk
01508 533791

6. Reporting to the Money Laundering Reporting Officer (MLRO)

- 6.1 The primary duty of any employee, member or third party under this Policy is to ensure that any suspicions or concerns that money laundering has occurred, or is likely to occur, should be reported to the MLRO as soon as the suspicion arises. It is essential that an employee comes forward as soon as practical to the MLRO. The disclosure should be within ‘hours’ of a suspicious activity coming to an individual officer’s attention, rather than several days or weeks later. **Should this not be done, the employee may be liable to prosecution.** To support the above process, **Appendix 1** provides information on the types of activities where the Council may be subject to money laundering offences and guidance on situations where money laundering activities could occur.

- 6.2 Suspensions can be raised through direct contact with the MLRO, however it is preferable to use the reporting form which has been developed at **Appendix 2**, and e-mail the completed form to the MLRO.
- 6.3 The employee, member or third party should not make any further enquiries into the matter themselves, and any further action must be with the approval of the MLRO. Those who have raised a concern should ensure that they do not then voice their suspicions to the suspect and in so doing, tip them off to the concern.
- 6.4 The MLRO is required to promptly evaluate any concerns/disclosures raised and determine whether they require further investigation and hence referral to the National Crime Agency (NCA), using the reporting forms included at **Appendix 2**. The MLRO should not undertake investigation of any concerns themselves. Where legal professional privilege may apply, the MLRO must seek legal advice to determine the further action to be taken.
- 6.5 In some cases, it may be necessary to seek approval from NCA before the Council can undertake any further activity in respect of the transaction. Where the MLRO has made such a referral to NCA, they will notify the person raising the concern, and again inform the individual when NCA has provided permission for the transaction to proceed.
- 6.6 If a request for consent has been made to NCA, no action should occur for a period of 7 days or until NCA gives consent. If this results in a transaction having to be deferred or delayed, it should be carefully handled to ensure that the customer is not tipped off as to the money laundering concern.
- 6.7 After 7 days, if NCA does not notify otherwise, they are deemed to have given consent to the transaction. If NCA instead notifies they refuse to give consent, a moratorium period of 31 days starts on the day the Council receives the refusal notice. During this period, the Council cannot proceed with the matter for which the consent was applied. At the expiry of the moratorium period, NCA is deemed to have consented to the request and the Council can proceed.
- 6.8 The MLRO should retain the details of any referrals made, including correspondence with the necessary bodies, using the forms included in **Appendix 2**. All information should be retained for a minimum of 6 years.
- 6.9 To ensure the Council minimises the risk of tipping off, and to minimise any reputational damage should the suspicion be unfounded, the confidentiality of the matter will be respected at all times; the MLRO will only inform anyone of the suspicion where there is a genuine business need.

7 Customer Due Diligence

- 7.1 The Council undertakes some activities that may be considered, under the Money Laundering Regulations, to be regulated, however it does not undertake these activities by way of business, and therefore would not normally be expected to undertake due diligence in respect of any clients to whom it provides these services. The types of activities that are regulated are, for example, tax services, treasury services, financial and accounting

services, audit services, estate functions, assisting the formation, operation or arrangement of a company or trust, and dealing in goods with a cash payment of more than €15,000.

- 7.2 However, it is good practice that wherever the Council enter into such activities with a third party then due diligence checks should be actioned before the establishment of a relationship/transaction.
- 7.3 Undertaking customer due diligence checks can take a number of forms. HM Revenues and Customs has issued “core guidance” in this area. Consideration should be given to taking one or more of the following, where applicable:
- Confirming the identity of the client via documentation, data or information obtained from a reliable and independent source, e.g. passport, and/or position within an organisation, where appropriate.
 - Obtaining confirmation from Companies House as to the registration details of the Company and details of the Company business.
 - Seeking electronic verification, e.g. performing credit checks.
 - Obtaining confirmation to regulated industries bodies (e.g. in the case of accountants, checking to CCAB certified bodies).
 - Requesting copies of financial statements.
 - Requesting details of interests and beneficial ownerships – with reference to the latter this is any individual who holds more than 25% of the shares, voting rights or interest in a company, partnership or trust.
 - Obtaining information on the purpose and intended nature of the business relationship.
- 7.4 Any checks undertaken should remain proportionate to the risks of the individual business and the relationship. Additional checking may need to be performed if the person is not physically present to be identified, or they are politically exposed, by virtue of holding a prominent public function. Details of such checks should be recorded on the reporting forms in **Appendix 2** and retained for a minimum of 6 years, with an electronic copy of every customer due diligence record being retained by the MLRO to meet the requirements of the regulations and in case of inspection by the relevant supervising body.
- 7.5 There is also an ongoing legal obligation to check the identity of existing clients and the nature and purpose of the business relationship with them at appropriate times. One option to review these matters might be to do so as part of the ongoing monitoring of the business arrangements, as is usually provided for in the Terms of Business Letter, Service Level Agreement or other written record, as well as scrutinising transactions as they occur, paying particular attention to complex or unusually large transactions, unusual patterns of transactions and/or unexpected transactions, etc.

8 Training

- 8.1 The Council will take appropriate measures to ensure that all employees are made aware of the law relating to money laundering and will arrange targeted, ongoing training to key individuals most likely to be affected by the legislation.

9. Further Information

9.1 Further information can be obtained from the MLRO and the following sources:

- www.NCA.gov.uk – website of the National Crime Agency;
- Combating Financial Crime – Further Guidance on Anti-Money Laundering for Public Service Organisations, published by CIPFA in 2009;
- Anti Money Laundering (Proceeds of Crime and Terrorism) – Second Interim Guidance for Accountants, published by CCAB (www.ccab.org.uk)
- Gov.uk Money Laundering Regulations
<https://www.gov.uk/topic/business-tax/money-laundering-regulations>

10. Review of the Policy

10.1 The Policy will be reviewed at least every 3 years by the Senior Fraud and Inspections Officer with the Monitoring Officer (or more frequently if required by changes to statutory legislation), and the following parties will be consulted prior to approval;

- CMLT
- Finance, Resources, Audit and Governance Committee

How the Council may be exposed to Money Laundering

1. Guidelines to staff and members on concerns or suspicions

- 1.1 If you do have any suspicions or concerns about an individual or transaction then it is always better to raise those concerns appropriately. If necessary, you may wish to use the Council's Whistleblowing Policy for further support and guidance on how to raise a concern. Conversely, if in doubt, seek advice from the MLRO.
- 1.2 Although some offences and suspicions may be fairly apparent, some can be more difficult to identify. The simple guidance is to be vigilant, and not be afraid to question something if you don't think it looks right. If you think something looks suspicious, then the probability is someone else may also think the same. It is better for the Council to be safe when handling public money – it would not reflect well on the Council's reputation if it was found monies had been taken that were obtained through theft, drug trafficking, terrorism, etc.
- 1.3 It is recognised that a lot of the Council's activities are sensitive in nature, and in cases what, to some people, may be suspicious or concerning behaviour, from a money laundering perspective may not necessarily be in line with the activity occurring. However, people should always be mindful of genuine concern and suspicion.

2. The types of activities that may be affected

- 2.1 The following table sets out the types of activities that might be suspicious, and how the Council may come across those activities. It is not intended to be exhaustive, and just because something you are suspicious about is not on the list, it doesn't mean you shouldn't report it.

Activity	The types of activity that may be affected
New customers with high value transactions	<ul style="list-style-type: none"> Selling property to individuals or businesses Renting out property to individuals or businesses Entering into other lease agreements Undertaking services for other organisations
Secretive clients	<ul style="list-style-type: none"> Housing benefit claimants who have sums of money entering into / out of their bank account (even if we do not award them benefit, we should still consider money laundering implications) People buying or renting property from the Council who may not want to say what it is for People receiving grant funding who refuse to demonstrate what funding was used for
Customers who we think are acting dishonestly or illegally	<ul style="list-style-type: none"> People paying for Council services who do not provide details about themselves People making odd or unusual requests for payment arrangements.
Illogical transactions	<ul style="list-style-type: none"> People paying in cash then requesting refunds in the event of sizeable overpayments made

Activity	The types of activity that may be affected
	<ul style="list-style-type: none"> • Requests for the Council to pay seemingly unconnected third parties in respect of goods / services provided to the Council • Requests for the Council to pay in foreign currencies for no apparent reasons
Payments of substantial sums by cash	<ul style="list-style-type: none"> • Large debt arrears paid in cash • Refunding overpayments • Deposits / payments for property
Movement of funds overseas	<ul style="list-style-type: none"> • Requests to pay monies overseas, potentially for “tax purposes”
Cancellation of earlier transactions	<ul style="list-style-type: none"> • Third party “refunds” grant payment as no longer needed / used • No payment demanded even though good / service has been provided • Sudden and unexpected termination of lease agreements
Requests for client account details outside normal course of business	<ul style="list-style-type: none"> • Queries from other companies regarding legitimacy of customers • Council receiving correspondence / information on behalf of other companies
Extensive and over-complicated client business structures / arrangements	<ul style="list-style-type: none"> • Requests to pay third parties in respect of goods / services • Receipt of business payments (rent, business rates) in settlement from seemingly unconnected third parties
Poor accounting records and internal financial control	<ul style="list-style-type: none"> • Requests for grant funding / business support indicates third party not supported by financial information • Companies tendering for contracts unable to provide proper financial information / information provided raises concerns
Unusual property investments or transactions	<ul style="list-style-type: none"> • Requests to purchase Council assets / land with no apparent purpose • Requests to rent Council property with no apparent business motive
Overcomplicated legal arrangements / multiple solicitors	<ul style="list-style-type: none"> • Property transactions where the Council is dealing with several different parties • Property transactions where funds are received for deposits or prior completion from an unexpected source or where instructions for settlement of funds to be paid to unexpected destination.

CONFIDENTIAL

MONEY LAUNDERING REPORT FORM**Employee Details**

Name _____

Team _____

Date Reported _____

Contact details _____

Details

Give full details of the name (s) and address (es) of person(s) / company (s) / public body (s) / Directorship (s) involved.

Nature, value and timing of the activity involved – please include full details of what has happened, is on-going or imminently due to happen, where and how it has arisen and the amount of money/assets involved. Why exactly are you suspicious? Please continue on another sheet if necessary.

Investigations – has any investigation already occurred, as far as you are aware? If so, please detail below

Discussions – have you discussed your suspicions with anyone – including any advisory bodies? Please identify who you have contacted and why such discussions were necessary.

Disclosure – is there any reason why you believe this should not be disclosed to the National Crime Agency (NCA).

Further Information – if there is any further information you believe to be relevant, please include here:

Signed _____

Date _____

Please do not discuss the content of this report with anyone you believe to be involved in the suspected money laundering activity described.

This form, upon completion, should be forwarded to the MLRO

**MONEY LAUNDERING DISCLOSURE FORM – TO BE COMPLETED BY THE
MONEY LAUNDERING REPORTING OFFICER**

Date of Money Laundering Report Form being received _____

Date when acknowledged receipt of Money Laundering Report Form _____

Report Form related to:

Report Form completed by: _____

Officer contact details: _____

Action taken to review Report Form

Findings of review

Are there reasonable grounds for suspecting money laundering activity? If yes,
please give details.

If no, please explain reasons for non-disclosure.

If yes, please complete the following details

Date or report to NCA:

Details of liaison with NCA regarding the report:

Notice period:

Moratorium period:

Is consent required from NCA? Has consent been received?

Date consent given by MLRO to employee for Council to proceed with the transaction

Date consent given by MLRO to employee for any prohibited act transactions to proceed:

Other relevant information

Signed _____

Name _____

Date _____

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If enhanced verification required, please detail all checks performed:

--

Signed _____

Date _____

Contact details for officer _____

Purpose of business _____

Registered business address

E-mail address _____

Who are the Companies Directors – are there any beneficial owners (i.e. any person / company who owns more than 25% of the company in question)

--

Nature of transaction with company	

Signed _____

Date _____

SOUTH NORFOLK COUNCIL

WHISTLEBLOWING POLICY AND PROCEDURE

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EFFECTIVE DATE – 18 January 2016

This policy will be subject to regular review with any significant variations leading to re-presentation of the Policy.

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THE WHISTLEBLOWING POLICY

THIS POLICY SHOULD BE READ IN CONJUNCTION WITH THE COUNCIL'S DISCIPLINARY POLICY AND PROCEDURES, STAFF AND MEMBER CODES OF CONDUCT.

INTRODUCTION TO THE POLICY

1. What is Whistleblowing?

- 1.1 Whistleblowing is the raising of a significant concern. Concerns may cover issues of fraud, misconduct, or illegality, and this policy is designed to ensure that people know how to raise a genuine concern, and can do so in the knowledge that they will not face reprisal for their action.
- 1.2 Public Concern at Work (a charity which provides independent advice and information on whistleblowing) draws the following distinction between whistleblowing and pursuing a complaint:

“When someone blows the whistle they are raising a concern about danger or illegality that affects others (e.g. customers, members of the public, or their employer). The person blowing the whistle is usually not directly, personally affected by the danger or illegality. Consequently, the whistleblower rarely has a personal interest in the outcome of any investigation into their concern - they are simply trying to alert others. For this reason, the whistleblower should not be expected to prove the malpractice. He or she is a messenger raising a concern so that others can address it.”

2. What is the purpose of the Whistleblowing Policy

- 2.1 Employees, councillors and others who deal with the Council may be the first to spot things that may be wrong or inappropriate within the Council. However, they might not say anything because they think this would be disloyal, or they might be concerned that their suspicions are unjustified or might turn out to be so after enquiry. They may also be worried that they or someone else might be victimized, or are unclear with whom to raise their concern. However, if the Council has the chance to deal with a potentially serious problem at the earliest opportunity this can minimize the risks before serious damage can be caused to persons, property or reputation. Allegations made under the whistleblowing policy should relate to a matter within the public interest and not in relation to a personal or employment matter.
- 2.2 Members of the public may also have concerns, but be unsure how and when to express them.
- 2.3 South Norfolk Council has produced this Whistleblowing Policy to help:
 - Councillors
 - Employees (including temporary and agency staff)

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- Others with whom the Council has dealings (e.g. contractors, partners, suppliers and voluntary organisations), and
 - Helping members of the public understand how and when to contact the Council with their concerns.
- 2.4 It is also expected that contractors will be required to have their own whistleblowing policies and arrangements established in accordance with thresholds set in the Council's contract conditions through the tendering process. Where a contractor does not have its own policy, it is expected that the principles and arrangements of the Council's policy and associated procedures will apply.
- 2.5 The Council is committed to maintaining an open culture with the highest standards of honesty and accountability. It takes all inappropriate behaviour very seriously and is committed to investigating any genuine concerns raised.
- 2.6 This policy aims to ensure that any concerns can be raised with confidence and without any worry on the part of the whistleblower about being victimized, discriminated against or disadvantaged in any way as a result.

AIMS AND SCOPE OF THE POLICY

3. What types of concern are covered by the policy?

- 3.1 The Policy aims to:
- encourage you to feel confident in raising serious or sensitive concerns about inappropriate behaviour and to question and act upon concerns;
 - provide avenues for you to raise those concerns and receive feedback on any action taken;
 - ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied; and
 - Reassure you that you will be protected from possible reprisals or victimization if you have a reasonable belief that you have raised any concern in good faith.
- 3.2 Safeguarding is everyone's responsibility and South Norfolk is committed to safeguarding and promoting the welfare of children, young people and vulnerable adults. We take our responsibilities seriously and expect all staff to share this commitment. Anyone who has concerns regarding compliance with the safeguarding policy should use the Council's whistle-blowing procedures in order to ensure matters are addressed.
- 3.2 This policy is intended to deal with serious or sensitive concerns about inappropriate behaviour. The Public Interest Disclosure Act 1998, as amended by the Enterprise and Regulatory Reform Act 2013, sections 17-20, outlines that a "protected" disclosure of a concern is one which demonstrates one or more of the following:
- A criminal offence has been committed, or is likely to be committed
 - Disclosures related to a miscarriage of justice
 - A failure to comply with a legal obligation including safeguarding responsibilities

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- The endangering of an individual's health and safety
 - Unnecessary damage to the environment (for example, by pollution)
 - Deliberate concealment of information relating to any of the above.
- 3.3 Beyond the legal context above, the Council would encourage employees, members of the public, and any other interested parties to raise any significant concerns that they may have, as soon as they are reasonably aware of them. These concerns could be about any aspects of the Council's activities, e.g. with reference to Council employees, Members, or suppliers acting on behalf of the Council, and relate to issues that are either occurring now or likely to happen in the future.
- 4. What is not covered by the Policy?**
- 4.1 The Council has a number of policies and procedures to address other matters, for example:
- Employees' complaints about their terms and conditions of employment. These matters are dealt with through the Grievance Procedure.
 - Instances of bullying and harassment of Council's employees are dealt with through the Bullying and Harassment Policy.
 - Complaints from members of the public about the Council's services. These are dealt with through the Council's Complaints Procedure.
 - Concerns with reference to members should be referred to the Monitoring Officer.
- 4.2 It should be emphasized that this Policy is intended to assist individuals who have discovered malpractice or serious wrong doing, provided they make the disclosure in accordance with the Policy. Individuals who make disclosures outside the arrangements set out here will not be protected under this Policy and may not be protected under the Act.
- 4.3 The Policy is not designed to question financial or business decisions taken by the Council nor may it be used to reconsider any matters that have already been addressed under the harassment, grievance, disciplinary or complaints procedures.

SAFEGUARDS

5. Protecting the Whistleblower and Preserving Confidentiality

- 5.1 In accordance with the Public Interest Disclosure Act 1998, South Norfolk Council undertakes to protect, as best it can, an employee who blows the whistle from personal claims, victimisation, harassment or bullying as a result of his or her disclosure. This assurance is not extended to someone who maliciously raises a matter they know are untrue; such instances may be subject to the Council's disciplinary procedures.
- 5.2 The Council recognizes that the decision to report a concern can be a difficult one to make. If you raise your concern based on a reasonable belief and in good faith, you should have

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nothing to fear because you will be doing your duty to your employer and the public. The Public Interest Disclosure Act 1998 will protect you from dismissal or other detriment.

- 5.3 The Council will, at the request of the whistleblower, keep the nature of concerns confidential. It will not reveal names or positions without permission, unless it has to by law, or an enquiry results in a criminal investigation in which the whistleblower might be required as a witness. Whistleblowers should be aware, however, that the fact that enquiries are being made might, result in their identity becoming known. Where possible, the Council will make you aware if your identity is likely to be compromised through investigation.
- 5.4 All these matters will be explained at the time a concern is raised so the whistleblower can decide whether or not to proceed. The Council will also keep the whistleblower informed if the situation significantly changes.
- 5.5 Any investigations into allegations arising from your whistleblowing will not influence or be influenced by any other personnel procedures to which you may be subject.

6. Anonymous Allegations

- 6.1 The Council encourages whistleblowers to give their name when making an allegation. It will do all it can to protect the whistleblower. Concerns raised anonymously tend to be far less effective and if, for example, the Council does not have enough information, it may not be able to investigate the matter at all.
- 6.2 Also, from a practical point of view, it is impossible to provide protection to a person whose identity is unknown and more difficult to judge whether the concern is made in good faith or maliciously.
- 6.3 If whistleblowers feel that they cannot give their name, the Council will make a judgment on whether or not to consider the matter depending upon such things as:
 - The seriousness of the issue;
 - The quality of any documentary evidence submitted with the allegation;
 - Whether the concern is believable; and
 - Whether the Council can carry out a robust investigation based on the information provided to confirm the validity of the original allegation made.

7 Assurances to Third Parties

- 7.1 The assurances provided to employees raising concerns set out in section 5 above cannot be given in the same way to third parties. For example, the Council cannot guarantee protection to employees of third party (contractor) organizations. However, we expect that all contractors are aware of the Council's whistleblowing procedures, and act in accordance with these.

- 7.2 Further, with regard to members of the Public, whilst they are not afforded statutory protection in the same way as employees, the Council is committed to treating all citizens fairly. Raising a concern under this policy will not affect the rights of any council citizens as set out within Article 3 of the Council's Constitution.

8. Untrue Allegations

- 8.1 If a whistleblower makes an allegation which they believe is true, but it is not confirmed by an investigation, the Council will not take any action against them.
- 8.2 However, if a whistleblower makes a deliberately false or malicious allegation which they know is untrue, the Council will take appropriate disciplinary or legal action against them. Allegations of this nature are not protected by the Public Interest Disclosure Act 1998.

RESPONSIBILITY FOR WHISTLEBLOWING

9. Responsible Officer for Whistleblowing

- 9.1 The Council's Monitoring Officer is the Senior Officer in the Council who can take an independent view of any concerns raised. A record of concerns raised will be maintained and the outcomes will be reported as necessary, see 10.1 below (in a format to protect your confidentiality). Other Senior Officers in the Council support the Monitoring Officer in this role, as set out at **Appendix 1**.
- 9.2 All concerns raised will be handled in line with the Whistleblowing Procedural Guidance, as attached to this policy.

10. Responsibility for the Whistleblowing Policy

- 10.1 All concerns raised and the outcomes will be reported to the Finance, Resources, Audit and Governance Committee, by the Head of Internal Audit, annually in a form that does not endanger confidentiality. However, if no concerns are raised no report will be provided.
- 10.2 This policy is to be reviewed at least every 3 years by the Head of Internal Audit (or more frequently if required by changes to statutory legislation) and the following parties will be consulted prior to finalising and submitting the Policy to Cabinet for subsequent approval:
- Senior Council Officers responsible for receiving whistleblowing concerns
 - The Corporate Management Leadership Team
 - Finance, Resources, Audit and Governance Committee
- 10.3 On an annual basis, **Appendix 1** of the policy, which provides details of the key parties responsible for whistleblowing, shall be reviewed by the Head of Internal Audit to ensure that details remain relevant and up-to-date. This review will not require re-endorsement of the policy.

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- 10.4 The Head of Internal Audit is also responsible for making staff aware of the Policy's requirements through training and publicising initiatives.

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THE WHISTLEBLOWING PROCEDURE

HOW TO RAISE A CONCERN

11. Guidance for Members of the Public, Contractors, Councillors and Partners

- 11.1 Members of the Public, Contractors, Councillors and those involved with partner organization who suspect a Council Employee, another Councillor, Organisational Partners or other Contractors (in their dealings with the Council) of impropriety or illegality should contact one of the following:
- The Managing Director
 - The Monitoring Officer
 - The Deputy Monitoring Officer
 - The Head of Internal Audit
 - The Senior Fraud and Inspections Officer
- 11.2 If your concern relates to the Managing Director, this should be raised with the Leader of the Council (or the Deputy Leader of the Council if the Leader is unavailable) or Ernst and Young, as the Council's External Auditor. Conversely, if your concern relates to the Monitoring Officer, the Deputy Monitoring Officer or the Head of Internal Audit, this should be referred to the Managing Director.

All contact details are included within **Appendix 1** of the whistleblowing policy.

12. Guidance for Employees

- 12.1 Whistleblowers should not attempt to investigate any concern themselves, but raise their concern using one of the avenues shown below.
- 12.2 A Council employee should first raise a concern with their manager or Director. Guidance to employees on how to proceed is contained in the document **"Checklist for employees - How to react to concerns of inappropriate behaviour"** – see **Appendix 3**.
- 12.3 Guidance to managers on how to deal with a concern is contained in the document **"Checklist for Managers – How to react to concerns of inappropriate behaviour"** – see **Appendix 4**.
- 12.4 If the employee feels that it is inappropriate to raise a concern with their manager or Director given the person involved and/or the seriousness or sensitivity of the matter, contact should be made with one of the following officers
- The Managing Director
 - The Monitoring Officer
 - The Deputy Monitoring Officer
 - The Head of Internal Audit
 - The Senior Fraud and Inspections Officer

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These officers can also provide advice and guidance on how concerns may be pursued.

- 12.5 If your concern relates to the Managing Director, then this matter can be raised with the Leader of the Council (or the Deputy Leader of the Council if the Leader is unavailable) or Ernst and Young, as the Council's External Auditors. Conversely, if your concern relates to the Monitoring Officer, the Deputy Monitoring Officer, the Head of Internal Audit, or the Senior Fraud and Inspections Officer, this should be referred to the Managing Director .
- 12.6 Whistleblowers are encouraged to raise concerns promptly and where possible in writing, giving as much information as possible, such as relevant background, names, dates, places and the reason for their concern. In addition, any evidence to support the concern / suspicions should also be attached... **Appendix 5** to these procedures provides a form that can be utilised as a starting point. However, concerns can be raised by telephone or by meeting the appropriate officer. The earlier you express the concern the greater the likelihood that an appropriate intervention may be made, to minimize the risk, impact or continuation of the concern in question.
- 12.7 Although it will not be necessary to prove beyond doubt that an allegation is true, a whistleblower will be expected to demonstrate that there are reasonable grounds for voicing their concern.
- 12.8 Any whistleblower will be asked to declare any personal interest they may have in the concern being raised.
- 12.9 In matters concerning the health, safety and welfare of those on our premises (whether members of staff, contractors or visitors) anyone, including an elected safety representative, who becomes aware of a hazard (actual or potential) or dangerous occurrence should immediately notify the Corporate Health and Safety Advisor, before contacting any outside body, to ensure that immediate action can be taken if necessary to deal with the hazard. Contact can be made by telephone, email or the sending of a written report as appropriate to the situation.

13. Sources of Support for the Whistleblower

- 13.1 You may wish to discuss your concerns with a friend or colleague first. You may then find it easier to raise a concern if others share the same experiences or concerns.
- 13.2 For employees, trade union representatives can give general support and advice, or act on their behalf if this would help. This could be useful, particularly if the employee wishes to remain anonymous, to the extent that is possible.
- 13.3 The Council will encourage the trade unions to support any member of staff who raises a concern with them.
- 13.4 The Council further welcomes any member of staff to consult with Public Concern at Work if they are not sure about whistleblowing. Public Concern at Work is an independent charity which provides confidential support and advice to whistleblowers through a telephone helpline and the internet. Further details for Public Concern at Work are

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included in **Appendix 1**. In addition, a summary regarding the remit of Public Concern at Work is included at **Appendix 2**.

14. How the Council will respond

- 14.1 Whoever you raise your concerns with, and whether the concern is made by an employee, member of the public, contractor, Councillor or partner, an impartial person will be appointed to investigate your concern and you will be informed of who this is. Confidentiality will be maintained in accordance with section 5 of this policy.
- 14.2 In order to protect individuals and those accused of misdeeds or possible malpractice, initial enquiries will be made to decide whether an investigation is appropriate, and, if so, what form it should take. The overriding principle which the Council will have in mind is the public interest. Concerns or allegations which fall within the scope of specific procedures (for example, harassment or discrimination issues) will normally be referred for consideration under those procedures.
- 14.3 Following these initial enquiries the Council will respond to your concerns as appropriate and establish whether or not:
- your concerns should be considered under this policy;
 - your concerns can be allayed satisfactorily without invoking a formal investigation;
 - no further investigation is necessary;
 - your concerns may be resolved by other mechanisms or action e.g. mediation, training or review; or
 - There is sufficient substance behind your concerns to trigger an investigation.
- 14.4 Where there is sufficient evidence behind the concerns to trigger an investigation the concern will:
- be investigated by management or internal audit; or
 - be referred to the police; or
 - be referred to the external auditor; or
 - Form the subject of an independent inquiry.
- 14.5 Some concerns may be resolved by action agreed with you without the need for investigation. If urgent action is required this will be taken before any investigation is conducted.
- 14.6 Within 10 working days of a concern being raised, the person appointed to investigate your concern will contact you (in a way which does not arouse suspicions in your workplace):
- acknowledging that the concern has been received;
 - indicating how we propose to deal with the matter;
 - giving an estimate of how long it will take to provide a final response;
 - telling you whether any initial enquiries have been made;
 - supplying you with information on staff support mechanisms;
 - advising you of your entitlement to seek advice and representation from your trade union representative;

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- telling you whether further investigations will take place and if not, why not; and
 - To agree with you how to proceed if you have chosen to remain anonymous.
- 14.7 The Council will do what it can to minimise any difficulties, which you may experience as a result of raising a concern. For instance, if you are required to give evidence in criminal or disciplinary proceedings the Council will arrange for you to receive advice about the procedure and other appropriate support.
- 14.8 Once the person appointed to investigate your concern has completed their investigations, they will produce a written report that sets out:
- the background to the whistleblowing concern;
 - the findings of fact and associated evidence;
 - the decision and reasons for the decision; and
 - The recommendations and associated action plan.
- 14.9 The Council accepts that you need to be assured that the matter has been properly addressed. Subject to legal constraints and any confidentiality or other issues, we will inform you of the outcome of any investigation.

15 Withdrawing your allegation

- 15.1 You have the right to withdraw any allegation previously made under this policy and procedure. You should think very carefully before taking this course of action, bearing in mind an investigation may have started and you may need to explain this change of decision.
- 15.2 If it is considered appropriate, despite the complainant withdrawing the allegation, the investigation of the allegation may continue if it is deemed necessary.

16 Raising issues with an External Party

- 16.1 This Policy seeks to encourage you to raise concerns directly with the Council. However, there may be situations where you feel it is inappropriate to raise the concern internally, or unable to do so. Alternatively, you may have already raised a concern and are dissatisfied with the outcome. In these situations, there are a number of other parties to whom you may turn:
- **The National Audit Office**
 - Relevant Regulatory Organizations (e.g. the Environment Agency, Health and Safety Executive or Local Government Ombudsman)
 - The Police (where a criminal matter is involved)
 - Public Concern at Work
- Contact details for all parties are included within **Appendix 1**.

- 16.2 Before consulting an external party, the Council recommends that the whistleblower seeks independent legal advice (disclosure to a legal advisor is protected by law). The law most readily protects disclosures that are seen to be “reasonable”, i.e. disclosures that are made within the Council or to an appropriate regulator at an early stage. If the matter is taken outside of the Council, the whistleblower should ensure they do not disclose information about a third party that may be covered by a duty of confidentiality (e.g. commercially sensitive information or personal, private data). It is recognised that potentially the Public Interest Disclosure Act and the Data Protection Act could have some bearing on disclosures, however one statute does not overrule the other and both must be complied with, and thus each case would need to be considered on its individual merits.
- 16.3 If you do take the matter outside the Council, you should ensure that you do not disclose confidential information. If you do this then you may need to check whether the information is confidential. Depending on the nature of the information, it may be confidential to South Norfolk Council, commercially sensitive to a third party or personal and private to an individual.

Contacts for Whistleblowing

Raising concerns internally

<u>Managing Director</u>	Trevor Holden mdtobdcandsnc@s-norfolk.gov.uk 01508
<u>Monitoring Officer</u>	Emma Hodds ehodds@s-norfolk.gov.uk 01508 533791
<u>Deputy Monitoring Officer</u>	Emma Goddard egoddard@s-norfolk.gov.uk 01508 533943
<u>Head of Internal Audit</u>	Faye Haywood fhaywood@s-norfolk.gov.uk 01508 533873
<u>Senior Fraud and Inspections Officer</u>	Ian Kerrison ian.kerrison@broadland.gov.uk 01603 430406
<u>Leader of the Council</u>	John Fuller 01508 588280 (home) jfuller@s-norfolk.gov.uk

Raising Concerns Externally

Public Concern at Work - www.pcaw.org.uk For support with how to raise concerns, and action to take in relation to all matters of malpractice and/or wrong doing.	3 rd Floor, Bank Chambers 6 – 10 Borough High Street London SE1 9QQ 020 7404 6609 whistle@pcaw.org.uk
Ernst and Young – External Auditors For issues relating to financial probity and governance	One Cambridge Business Park Cambridge CB4 0WZ 01223 394400
The Local Government Ombudsman – www.lgo.org.uk The Commission for Local Administration in England	PO Box 4771 Coventry CV4 0EH

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For Complaints against Councils – will cover all complaints	0300 061 0614
Norfolk Constabulary – www.norfolk.police.uk For all breaches of the law (except as noted below)	Operations and Communications Centre Jubilee House Falconers Chase Wymondham Norfolk NR18 OWW 0845 456 4567
Serious Fraud Office – www.sfo.gov.uk Fraud and Corruption issues	2 -4 Cockspur Street London SW1Y 5BS confidential@sfo.gsi.gov.uk
National Crime Agency www.nationalcrimeagency.gov.uk For Money Laundering Issues	Units 1 - 6 Citadel Place, Tinworth Street, London SE11 5EF 0370 496 7622
The Health and Safety Executive – www.hse.gov.uk For Health and Safety contraventions	Rosebury Court 2 nd Floor St Andrews Business Park Norwich Norfolk NR7 0HS
The Environment Agency – www.environment-agency.gov.uk For environmental crimes	National Customer Contact Centre PO Box 544 Rotherham S60 1BY 03708 506 506
National Benefit Fraud Hotline	0800 854 440
National Audit Office	Investigation-team@nao.gsi.gov.uk 020 7798 7000 (main switchboard)

Version 1 – 28 June 2013
Version 2 – 18 January 2016 – administrative changes only
Version 2.1 – 20 March 2017 – minor update
Version 2.2 – 30 January 2018 –administrative changes
Version 2.3 – 12 January 2021 – administrative changes

PUBLIC CONCERN AT WORK

Public Concern at Work (PCaW) is the independent authority on public interest whistleblowing. Established as a charity in 1993 following a series of scandals and disasters, PCaW has played a leading role in putting whistleblowing on the governance agenda and in developing legislation in the UK and abroad. All their work is informed by the free advice they offer to people with whistleblowing dilemmas and the professional support they provide to enlightened organisations.

They have four activities. They:

- offer free, confidential advice to people concerned about crime, danger or wrongdoing at work;
- help organisations to deliver and demonstrate good governance;
- inform public policy; and
- Promote individual responsibility, organisational accountability and the public interest.

They do:

- ✓ advise how to raise concerns
- ✓ explain the public interest
- ✓ separate message from messenger
- ✓ provide an impartial, objective view

They don't

- ✗ duck difficult questions
- ✗ claim we have all the answers
- ✗ litigate or investigate
- ✗ encourage anonymous informing

Whistleblowing dos and don'ts as publicised by Public Concern at Work

Do:

- Keep calm;
- Think about the risks and outcomes before you act
- Remember you are a witness, not a complainant
- Phone us for advice - 020 7404 6609!

Don't:

- Forget there may be an innocent or good explanation
- Become a private detective
- Use a whistleblowing procedure to pursue a personal grievance
- Expect thanks

Version 1 – 28 June 2013

Version 2 – 18 January 2016 – administrative changes only

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CHECKLIST FOR EMPLOYEES

HOW TO REACT TO CONCERNS OF INAPPROPRIATE BEHAVIOUR

The action you take when you suspect inappropriate behaviour may have happened, or be about to happen, can be crucial. Inappropriate behaviour is described in the Council's Whistleblowing Policy as:

- Any criminal offence, particularly fraud or corruption
- Disclosures related to a miscarriage of justice
- A failure to comply with a legal obligation
- The endangering of an individual's health and safety
- Unnecessary damage to the environment (for example, by pollution)
- Deliberate concealment of information relation to any of the above

Following these simple rules should help the Council in carrying out enquiries into any concerns you have.

DO

- ✓ **Make an immediate note of your concerns.**
Note all relevant details, such as what was said in telephone or other conversations, the date, time and the names of any parties involved.
- ✓ **Convey your suspicions to someone with the appropriate authority and experience in accordance with the Council's Whistleblowing Policy.**
- ✓ **Deal with the matter promptly if you feel your concerns are warranted.**
Delay may cause the Council to suffer further financial loss or make further enquiry more difficult.

DON'T

- ✗ **Do nothing.**
- ✗ **Be afraid of raising your concerns.**
You will not suffer any recrimination from the Council as a result of voicing a reasonably held suspicion. The Council will treat the matter sensitively and confidentially, and will take reasonable steps to protect anyone who raises a well-intentioned concern.
- ✗ **Approach or accuse any individuals directly.**
- ✗ **Try to investigate the matter yourself.**
There are special rules surrounding the gathering of evidence. Any attempt to gather evidence by people who are unfamiliar with these rules may weaken or destroy any future prosecution should that be thought appropriate.

- ✗ **Convey your suspicions to anyone other than those indicated in the Council's Whistleblowing Policy.**

The Public Interest Disclosure Act 1998 - will protect you from any reprisals as long as you meet the rules set out in the Act. The rules are:

- **You must disclose the information in good faith**
- **You must reasonably believe it to be substantially true**
- **You must not seek any personal gain**

GUIDANCE FOR MANAGERS

HOW TO REACT TO CONCERNS OF INAPPROPRIATE BEHAVIOUR

The action you take when you identify, or are made aware of, suspected inappropriate behaviour can be crucial in determining the success of any subsequent enquiries. Inappropriate behaviour is described in the Council's Whistleblowing Policy as:

- Any criminal offence, particularly fraud or corruption
- disclosures related to a miscarriage of justice
- A failure to comply with a legal obligation
- The endangering of an individual's health and safety
- Unnecessary damage to the environment (for example, by pollution)
- Deliberate concealment of information relating to any of the above

Following these simple rules will help to ensure that matters are properly handled. As a manager you should familiarise yourself with both the Council's Strategy to help fight Fraud and Corruption and its Whistleblowing Policy

DO

✓ **Be responsive to employees' concerns.**

As part of the Council's anti-fraud and corruption culture, you should encourage employees to voice any reasonably held suspicion. As a manager you should treat all employees' concerns seriously and sensitively.

✓ **Note details.**

Get as much information as possible from the employee reporting the suspicion and encourage them to record this in writing. If the employee has made any notes, request access to these

Note any documentary evidence which may exist to support the allegations made, but do not interfere with this evidence in any way.

✓ **Evaluate the allegation objectively**

Before you take the matter further determine whether any suspicions appear to be justified.

Be objective when evaluating the issue. Consider the facts as they appear based on information you have to hand.

If in doubt, report your suspicions anyway.

If you consider that no further action is necessary, you should still record your decision and also inform the Head of Internal Audit of the original notification details.

✓ **Advise the appropriate person**

If you feel that a suspicion is justified advise an appropriate officer in accordance with the Council's Whistleblowing Policy

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- ✓ **Deal with the matter promptly if you feel your concerns are warranted.**
Delay may cause the Council to suffer further financial loss or make further enquiry more difficult.

DON'T

- ✗ **Ridicule suspicions raised by employees**
The Council cannot operate an effective anti-fraud and corruption culture or Whistleblowing Policy if employees are reluctant to pass on their concerns to management due to fear of ridicule or recrimination.
You need to ensure that all employee concerns are given a fair hearing. You should reassure employees that they will not suffer recrimination by raising any reasonably held suspicion.
- ✗ **Approach or accuse any individuals directly**
- ✗ **Convey your suspicions to anyone other than those indicated in the Council's Whistleblowing Policy**
- ✗ **Try to investigate the matter yourself**
Investigations by employees who are unfamiliar with the requirements of evidence are highly likely to jeopardise a successful outcome. They may also alert the suspect and result in the destruction of evidence.

Your primary responsibility is to report the issue and all associated facts to the appropriate officer, wherever possible.

WHISTLEBLOWING FORM

Please complete this form and email it to:

ehodds@s-norfolk.gov.uk

Alternatively this can be sent to:

Monitoring Officer

Strictly Private and Confidential

South Norfolk District Council, Swan Lane, Long Stratton, Norfolk NR15 2XE

Name:
Address or contact details:
Telephone:
Best time to contact you:

Person assisting you (e.g. relative, friend, union official (if appropriate):
Address or contact details:
Telephone:

Details of your concern (please continue on a separate sheet if necessary and attach any evidence supporting your concern):

Signature: _____

Date: _____

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Public Sector Equality Duty Annual Report

Report Author(s): Linda Mockford
Governance Manager
01603 430424
Linda.mockford@broadland.gov.uk

Portfolio: Governance and Efficiency

Ward(s) Affected: All

Purpose of the Report:

To summarise the progress made by Broadland District Council and South Norfolk Council during 2020 in complying with their duty under the Public Sector Equality Duty, as required by the Equality Act 2010.

Recommendation:

Cabinet is asked to approve the joint Public Sector Equality Duty Annual Report, as attached at Appendix A.

1. Summary

- 1.1 The Equality Act 2010 requires public bodies to publish an annual report demonstrating how they have complied with the Public Sector Equality Duty. It is proposed that the report at Appendix A be published in 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 Broadland and South Norfolk Councils.

2. Background

- 2.1 The Equality Act 2010 introduced a Public Sector Equality Duty (PSED). This Duty requires Broadland and South Norfolk Councils in addition to other public sector organisations, to have due regard to the need to:
 - a. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - b. Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - c. Foster good relations between people who share a protected characteristic and those who do not.
- 2.2 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. Current position/findings

- 3.1 2019 was the first year that Broadland and South Norfolk Councils reported jointly on their shared equality work. During 2020, the responsibility for Equalities was passed from the Policy Team to the Governance Team which now oversees all equalities work.
- 3.2 The report at Appendix A highlights just some of the activities and work which has been undertaken by the Councils during 2020, detailing how this meets our requirement to comply with the Public Sector Equality Duty.
- 3.3 Members will note that much of this work would have been undertaken even if the Councils were not required to comply with the Duty, which demonstrates how the importance of diversity, inclusivity and equalities are at the heart of all we do as Local Authorities.

4. Proposed action

- 4.1 It is proposed that Cabinet approves the appended report for publication, in order to meet the statutory duties placed on the Councils by the Equality Act 2010.

5. Other options

- 5.1 Cabinet may wish to take another course of action, keeping in mind the requirements of the Public Sector Equality Duty as detailed in paragraph 1.1.

6. Issues and risks

- 6.1 **Resource Implications** – There are no resource implications associated with the publication of this report.
- 6.2 **Legal Implications** – If the appended report is not published, the Council will be in breach of its statutory duties under the Equality Act 2010.
- 6.3 **Equality Implications** – The publication of this annual report is a key mechanism through which the Council can fulfil its accountability to its residents, demonstrating that equality issues are taken seriously and evidencing 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 the community.
- 6.4 **Environmental Impact** – There are no environmental impacts associated with the publication of this report.
- 6.5 **Crime and Disorder** – There are no impacts to crime and disorder associated with the publication of this report.
- 6.6 **Risks** – If statutory duties are not met, action could be taken against the Council by the Equality and Human Rights Commission with legal, financial and reputational risks for the Council.

7. Conclusion

- 7.1 The report details the Council's successful work in demonstrating compliance with our Public Sector Equality Duty.
- 7.2 Publication of the appended report will not only fulfil our duty but also celebrate the examples of good work undertaken by the Councils.

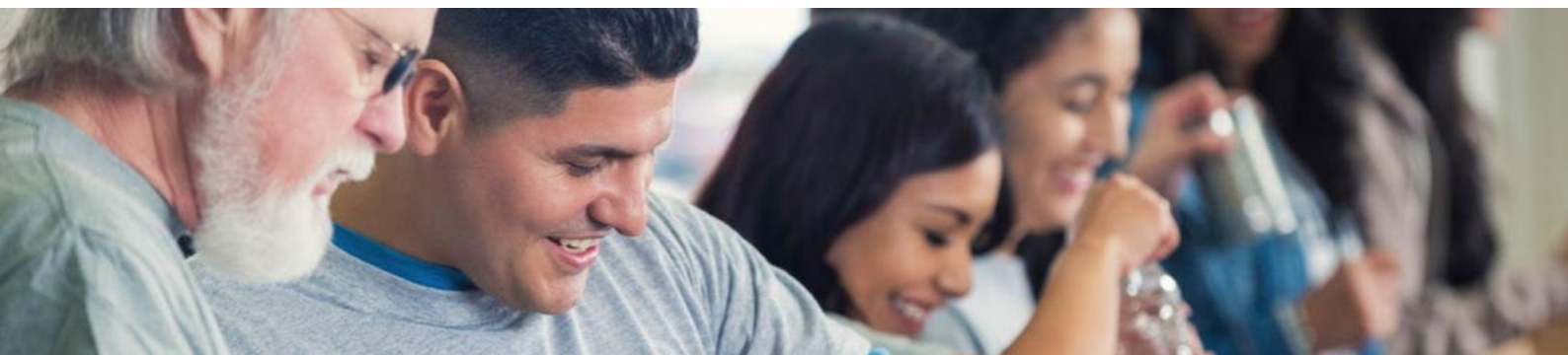
8. Recommendation

Cabinet is asked to approve the joint Public Sector Equality Duty Annual Report, as attached at Appendix A.

Background papers

None

Equalities at Broadland District Council and South Norfolk Council



Public Sector Equality Duty Annual Report 2020/21

The Public Sector Equality Duty

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 and South Norfolk Council must have due regard to the need to:

- 1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act;**
- 2. Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it; and**
- 3. 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 & maternity**
- **race**
- **religion or belief**
- **sex**
- **sexual orientation**
- **marriage & civil partnership** (only relevant to Aim 1 - eliminating discrimination)

To ensure transparency of this duty, the Equality Act 2010 (Specific Duties) Regulations 2011 requires public authorities to publish information to demonstrate their compliance with the general equality duty. This report should pay particular reference to employees, and people affected by the policies and practices of the Councils, who share one or more of the above protected characteristics. In addition to treating people fairly, justly and with respect, our duty is to find ways to support those who are disadvantaged or excluded, promote inclusion and celebrate diversity.

The Act requires local authorities to provide a service which is equally accessible to all their customers and a workforce which promotes diversity and equality. The benefits of a diverse workforce go beyond political correctness. Bringing in people with different backgrounds and perspectives can lead to better decision-making, greater innovation, higher engagement in the workplace, and can bring fresh ideas. It may also improve an organisation's reputation and make it easier to attract top talent. Companies that embrace diversity and inclusion report higher engagement, lower turnover and increased income.

Equality considerations should be at the centre of policy formation and not merely a tick box exercise. Decision-makers should be aware of their obligations in order to comply with the Act, ensuring that mechanisms are in place so that relevant equality impacts can be taken into consideration along with other factors when they come to make their decision. There is a requirement for due regard to be given to removing or minimising disadvantages suffered by people due to their protected characteristics and sometimes this might entail treating a disadvantaged group more favourably than others. However, there will be times that, after consideration, decisions may be made which do not meet all equality issues and in these cases, there should be a well-documented trail to demonstrate that issues have been raised and given due regard to ensure that compliance with the Act has been achieved.

This report demonstrates just some of the ways in which Broadland District Council and South Norfolk Council have complied with their Public Sector Equality Duty during 2020/21.

How we complied with the Act during 2020/21

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.

For our residents:

Help Hubs

During the last year, the Councils, via the Help Hubs have worked hard to maintain effective collaboration between partners to ensure that those who are most vulnerable, and likely to be victimised, have the benefit of a multiagency partnership to share information and support.

Examples of where we have made a difference:

- 1. The police brought to our attention a man who was being victimised because of his sexual orientation. He was living in a village and felt discriminated against and did not have a support network. We worked closely with the police whilst the investigation was ongoing to provide support to the man to boost his confidence and give him reassurance, as well as practical help and advice about taking control of his life, which enabled him to find his own networks of help.*
- 2. A resident living in one of our Districts is gay and also disabled, and he has a lodger who is Asian. The resident and his lodger were both the victims of anti-social behaviour driven by racist and homophobic sentiment. The resident had begun to suffer from mental health difficulties from some other residents resultant from this persecution. The Hub, through its Connectors, was able to assist him to get free public transport to access community-based support groups specific to his protected characteristics. They were also able to link him with appropriate mental health support. He was assisted in seeking the assistance of the Community Protection Team who intervened effectively in terms of the anti-social behaviour and persecution from his neighbours.*

These examples demonstrate that isolation and lack of confidence can affect people with protected characteristics and can often be barriers to fulfilling potential and seeking assistance to overcome discrimination and harassment. The help hubs' strength is helping people to help themselves, as well as working closely with partners to ensure information and support is shared and coordinated.

Equality Impact Assessments

The Councils provide many different services for Broadland and South Norfolk residents – from housing to planning, from community work to the care of people using the services of the help hubs. Indirect discrimination can occur when a policy or procedure is put in place which applies to everybody, but puts those who have a protected characteristic at a disadvantage. Therefore, when we plan and develop policies and services, or propose changes to services, we consider it essential that due regard is given to whether there are any potential negative impacts upon individuals and/or groups of people with protected characteristics. Risk and Equality Impact Assessments are undertaken by officers and their findings are documented and reported to enable decision-makers to take any issues into account as part of the decision-making process.

Housing Solutions

In designing and implementing the Councils' new Housing Policy, a full and detailed Equalities Impact Assessment was completed to ensure we had a full picture of what impact the changes were going to have on residents. The assessment allowed us to make informed choices and suitable adjustments to ensure those who were most vulnerable were provided with the priority that they needed.

The Policy and the 'needs assessment' state that we will give due regard to the nine protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, with the intention that this will help to eliminate discrimination. In addition, we have included the victims of domestic abuse as a qualification rule in the new Policy, which includes those who are living in refuges in the districts, so these residents can have access to our housing register.

The initial assessment process specifically asks questions relating to vulnerability in general but also gives regard to all of the protected characteristics, meaning that staff are required to actively take these factors into account in their assessment of need, and act accordingly. To demonstrate the Councils' commitment to eliminating discrimination, we have written this process into our Policy, recognising that this holds us to account if we are challenged in a review.

For our staff:

Bullying and Harassment

The Councils are committed to creating a work environment free from bullying and harassment, where everyone is treated with dignity and respect. In this vein the Councils do not tolerate discrimination, harassment or victimisation within its premises, by anyone associated or employed by the Councils, or by anyone pursuing prospective employment of the Councils.

Grievance

The Councils' grievance policy allows for all employees to have the right to raise a problem, complaint, or concern in relation to any workplace matter. The Councils will investigate and provide a fair, timely and transparent outcome for any instances of discrimination, harassment or victimisation, and these types of complaints are taken extremely seriously. The policy ensures clarity and equality for both employees and managers and requires that any special measures, along with reasonable adjustments, will be considered to ensure equality of access to the process for staff who possess one or more of the protected characteristics, as detailed in the Act.

Conduct

The Councils are committed to promoting equality and fairness amongst members of staff. In addition, employees must treat all members of the local community, councillors, suppliers, customers and residents with due regard to fairness, trust and integrity, creating a positive working environment in which to operate. The Councils ensure that understanding is promoted, with education on key areas a priority in preventing prejudice and forming positive relations between individuals and groups.

Staff and Member Training

The Councils have sourced and provided online training courses via SkillGate to ensure all staff and elected members have a good understanding of equality, diversity and inclusion, and are made aware of their duty under the Equalities Act. These modules are: 'The Importance of Equality, Diversity and Inclusion' and 'Unconscious Bias'.

Transgender Policy

We are strongly committed to equal opportunity, eliminating discrimination, promoting good relations and valuing diversity through fair treatment in all aspects of the Councils' activities. The Transgender Policy aims to ensure that everyone is treated with equal dignity, fairness and respect, regardless of their gender identity. Our aim is to ensure the safety, comfort and integration of transgender or gender non-conforming employees whilst promoting equal opportunities. As part of the Councils' overall commitment to equality of opportunity, we are fully committed to promoting a supportive and harmonious working and service provision environment where every employee and member of the community is treated with respect and dignity. Our aim is to create an environment in which all employees and members of the public feel equally valued and welcome in accordance with the Gender Recognition act (2004).

New and expectant mothers

In order to ensure the health and wellbeing of new and expectant mothers, the Councils ensure that risk assessments are undertaken, in partnership with the pregnant employee, to assess and manage risks and identify suitable modifications and alterations to work activities and patterns. During 2020, these have included the consideration of COVID-19 and the risks associated with this disease. Government guidance is followed and risks are assessed appropriately, in line with this guidance.

Disability Confident Scheme

South Norfolk and Broadland District Councils have been awarded the Disability Confident standard. The Councils committed to working with the Job Centre and the Department of Work and Pensions to support and promote people who identify as disabled in the workplace. This commitment includes:

- ensuring our recruitment processes are free from discrimination and available through a range of channels;
- making job advertisements accessible which includes providing information in accessible formats, if required;
- offering interviews to those candidates who have a disability and meet the essential criteria for the role, as detailed in the job description; and
- making reasonable adjustments as required.

To read more about our aims under the scheme, please view the following link:

[Disability Confident scheme.](#)

2. Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.

For our residents:

Housing Standards

The Councils' Housing Standards Team provides services which particularly benefit those who are elderly or disabled and to a lesser extent residents who possess other characteristics as the elderly and disabled are more likely to need physical adaptations, and the BAME community in general are more likely to be in lower income roles, renting and in poorer quality accommodation, and more likely to be discriminated against. In 2020, the Councils undertook proactive work around Houses of Multiple Occupation (HMOs), through COVID-19 where we identified a number of unlicensed HMOs which we are now proactively targeting. By requiring licences, we are ensuring that properties meet the standards required by law and we can ensure that people from poorer communities receive the same level of protection and support than those from wealthier communities.

Disabled Facilities Grants Scheme

Another role of the Housing Standards Team is administering disabled facilities grants which focus predominantly on helping residents, who are older and have physical or mental disabilities, to remain independent in their own homes. We proactively seek out those who are in need and work with partner organisations. An example this year is where we had an elderly man whose wife had been his main carer until she died. The man wanted to remain independent in his own home and so we completed an assessment of his home and made some immediate small adaptations to his property, followed by a larger adaptation to create a wet room, which meant he didn't have to travel upstairs to have a bath.

Covid-19 Vaccine Roll-out

The Councils' Communities Team has worked alongside colleagues in Health Services to support their efforts to roll out the Covid-19 vaccine as quickly as possible. Officers took proactive action and played a leading role in ensuring that particular vulnerable groups who were deemed to be at higher risk of being harder to reach, would not be disadvantaged. These were namely gypsy and travellers, homeless and rough sleepers, sex workers and/or vulnerable migrants. The Councils played a leading coordination role by enlisting the help of people who worked with these groups to ensure that the contacting of people in these groups was positively received, well managed and avoided duplication of efforts.

Accessibility of Website

Since 23 September 2018 it has been a legal requirement for public sector bodies to provide accessible digital content to both internal and external customers and employees. The Councils work hard to ensure that content on their websites meet with this requirement to remove disadvantages impacting on people with a disability.

Help Hubs

We have refreshed our 'request for support' form to make it easier to complete and have made this available online for easy access. We have also maintained a phone line and text service for accessibility and our Community Connectors ensure that face to face meetings can happen, when required. This ensures that all customers can access this service, regardless of age or disability.

For our staff:

Equal Opportunities

The Councils are committed to ensure equal opportunities exist on properties owned by the Councils or by anyone associated or under employ of the Councils, or by anyone pursuing prospective employ of the Councils.

The Councils have various employee-based schemes, aimed at instilling a culture of equality and equal opportunities for individuals who share, or do not share, a protected characteristic. These include:

- Dementia Friends. The Councils are registered with Dementia Friends which provides external resources and support for employees wishing to have more information, or who have friends or family affected by dementia. Many of the Councils' staff have undertaken training to become Dementia Friends;
- Kickstart youth employment scheme. The Kickstart scheme provides funding for job placements specifically aimed at individuals aged 16- 24 on Universal Credit, who are at risk of long term unemployment. This helps to ensure that job and employability support is available to help the individuals find work going forwards;
- Flexible working policy. The Councils' flexible working policy is aimed at helping staff find the right balance between their professional and personal lives. This policy promotes equality and wellbeing amongst our employees, preventing personal circumstances from obstructing their professional careers;
- Maternity and paternity policies. The Councils' Maternity/Paternity Policies provide an opportunity for parents to take time away from work and return to their roles at the end of the period of leave; and
- HEAR domestic abuse campaign. The Councils have signed up to the HEAR pledge which helps victims of domestic abuse. The Councils have employees who are registered as domestic abuse champions and are able to provide confidential support and advice to employees seeking help.

Mental Health Awareness and Support

A person is considered to have a disability under the Equality Act 2010 if they have a physical or mental impairment which has a substantial long-term adverse effect on their ability to carry out normal day-to-day activities and can include depressive and anxiety-related impairments. The Councils are committed to recognising and raising awareness for mental health and determined to provide a culture of support. On Mental Health Day, the Councils produced an infographic for staff to concentrate on improving mental health and detailing the support options available, including links to Carefirst, which provides staff with support via articles and resources as well as an employee support helpline.

3. Foster good relations between people who share a relevant protected characteristic and those who do not share it.

For our residents:

Raising the Awareness of LGBTQ+

The 2019 Annual Equalities Report detailed a touring exhibition which had been launched to engage with residents across South Norfolk and Broadland, in partnership with The Ancient House Museum in Thetford and Norfolk Museum Service. This tour aimed to raise awareness of LGBTQ+ rights, and included an explanation of queer terminology, and a timeline charting the changes in the legal framework of the country around LGBTQ+ issues. The exhibition also served to promote the Norfolk LGBT project and posters were displayed in public areas directing people to the contact helpline. It was hoped that this tour would be continued throughout 2020 but, due to COVID-19, it has been deferred until current restrictions allow it to resume.

Norwich Pride

We fly the Pride flags in support of Norwich Pride every year during the month of July, and at South Norfolk on Show, and promote Pride via social media. In 2020, the Councils submitted a message of support for inclusion in Norwich Pride's virtual parade and also reported on the Unison LGBT+ Representative's Run With Pride project. This reflects the Councils' commitment to foster good relations and raise the awareness of this protected group throughout the districts.

Help Hub

The Help Hub received a request to support an African person who had recently moved into South Norfolk for work but was struggling with integrating into the local community. Our Connector Team supported her with confidence-building, provided her with practical advice about the local areas, and introduced her to a local support network. The resident now feels more confident and is building their social networks (albeit online whilst in lockdown).

Mental Health Support Groups

This year the Councils have created three mental health peer support groups to enable people who are experiencing mental wellbeing or resilience issues to come together. 'All about you' runs weekly and offers a chance for people who are experiencing this type of disability to come together, meet similar people, and share experience and learning, with the aim of creating a long-term peer support network.

The Impact of COVID-19

It is disappointing that many of the planned community activities and events, which would have celebrated diversity and fostered good relationships within the community during 2020, had to be cancelled due to COVID-19. We remain optimistic that these events and more will be able to take place in the second half of 2021, when restrictions will hopefully have been lifted.

For our staff:

In-house Mental Health First Aiders

COVID-19 and the related issues around working from home, the increase in officer workloads, trying to juggle home-schooling, and staff with worries about their own and their loved-one's health have all had a significant impact on the mental wellbeing of many of the Councils' staff during 2020. Staff have access to a helpline where they can receive help with mental health issues but it is also sometimes beneficial for employees to speak directly to friends and colleagues who understand each other's issues and can offer support. In order for staff to be able to offload anxieties and support one another throughout the pandemic and beyond, the Councils have arranged for around 40 of its employees to be trained as Mental Health First Aiders who can provide wellbeing support, listen and communicate non-judgmentally and respond to anyone who needs help. It is felt that by providing help in-house, this fosters good relationships between people who share the protected characteristic of mental health disability and those who do not and also raises the awareness of mental health throughout the organisations. Regular drop-in sessions have been set up via Zoom so staff can pop in to talk to colleagues who are trained Mental Health First Aiders about any issues affecting their mental health, share their thoughts or even just to see a friendly face for ten minutes, which can make a huge difference to someone who is struggling to cope or might live alone.

Staff Consultation Forum and Unison Representation

The Councils operate a Staff Consultation Forum where employees can bring their views to the attention of management. The Staff Negotiation Forum is comprised of staff with representatives from Unison and the management team. Membership of the group is diverse and its representation encompasses staff who possesses a variety of the nine protected characteristics, which ensures all staff are represented.

Promotion of Norwich Pride

The Councils have promoted Norwich Pride and raised the awareness of LGBTQ+ to its employees to ensure inclusion and to embrace diversity amongst its staff. In 2020, this included Pride being featured on the agenda for an all-staff briefing, the promotion of LGBTQ+ History Month to staff through broadcast messages, and features detailing several fun events on its staff intranet.

Looking ahead to 2021

Plans for Pride 2021

Officers have contacted the organisers of Norwich Pride to see how the Councils can get involved in supporting the event. The Pride flags will be flown at the Councils' offices and we will be advertising and raising the profile of pride history month throughout the districts and on social media. The Councils hope to be able to provide some information on other flags, in addition to the generic pride flag which is traditionally raised, so we can acknowledge all of the flags and explain some of the different meanings behind them.

Promoting Equalities

In 2019, funding was secured from the Arts Council for a three-year project to deliver South Norfolk on Show. Each of the three annual events was to be delivered under a specific theme. In year one, the theme was 'Health and Wellbeing' and it was intended that the theme for year two was 'Equalities' which would have been delivered in July 2020 but was cancelled due to COVID-19. The aim was to highlight the none protected characteristics in collaboration with special interest groups and support agencies. It is hoped that this event will take place as soon as conditions permit.

Communities

The Communities Team, in the course of its community activities throughout the pandemic, has identified several groups of ethnic minority residents. During 2021 as we come out of lockdown, we plan to put further resource into working to enrich the Councils' engagement with these groups.

Elections

The Councils are part of a Government pilot to test devices in ten of their polling stations which, if successful, will enable blind and partially-sighted people to vote unaided in future elections. This is an important step in advancing equality of opportunity for people with this disability.

In Person Meetings

Report Author(s): Emma Hodds
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Portfolio: Leader

Ward(s) Affected: All

Purpose of the Report:

This report provides Cabinet with an update and a way forward following the announcement from the Ministry of Housing, Communities and Local Government that The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020 will not apply to meetings on or after 7 May 2021.

Recommendations:

Cabinet to:

1. Note the guidelines and protocols for In Person meetings from the 7 May 2021.
2. Recommend to Full Council the subsequent amendments to the standing orders as a result of adopting this approach and as outlined in Appendix A.
3. Note the proposal to set up a Committee of chairs to manage capacity/priority.
4. Recommend to Full Council to delegate to the MO in consultation with the Committee of Chairs the ability to amend the standing orders as required in this regard.

1. Summary

- 1.1 This report provides Cabinet with an update and a way forward following the announcement from the Ministry of Housing, Communities and Local Government (MHCLG) that “The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020” will not apply to meetings on or after 7 May 2021.

2. Background

- 2.1 At its meeting on 24 April 2020 the Emergency Committee agreed to the new governance arrangements for all Committee meetings that would be held during the strict conditions of the initial national lockdown, due to the pandemic. This enabled such meetings to be held virtually and the Constitution was appropriately updated at; *Part 4.5 Standing Orders & Rights of Public at Meetings – (I) Meetings held in accordance with Section 78 of the Coronavirus Act 2020.*
- 2.2 The Council initially conducted business through the Emergency Committee, however quickly moved to a full calendar of meetings and has successfully held all of these meetings using the Zoom platform for Members, Officers and those members of the public wishing to speak on items. A number of public facing meetings have then been live streamed to the Council's You Tube channel, enabling members of the press and public to view the meeting. This approach has resulted in more engagement and awareness in decision making and the Council is keen to continue with these benefits as far as legally possible.
- 2.3 During May and June 2020 the Council ensured that the office space became Covid secure, which has resulted in changes being made to the Council offices in conjunction with an agile workforce that still predominantly works at home. Covid-Security means that only every other desk is equipped to be used by staff, not all toilets are in use, there is hand sanitiser at key points throughout the building, doors are propped open to ensure a well ventilated office space, staff sign in & out of the building and there is regular touch point cleaning throughout the day.
- 2.4 When in-person meetings resume and a greater number of staff work from the office, many of these Covid Secure features will remain alongside additional capacity and distancing constraints relating to the whole building itself and rooms and spaces within it.
- 2.5 A workplace risk assessment has also been undertaken to ensure that the Council meets the requirements as set out by the Health and Safety Executive, these are regularly reviewed and are available on the Council website. It is important that any introduction of physical Committee meetings is in line with these risk assessments, which will be updated to reflect this. Members should be aware that the buildings will look and feel quite different and a video will be made available to all Members to view ahead of any return.

3. Current position

- 3.1 A letter from the Minister for Local Government Finance & Growth, Luke Hall has the following salient points that the Council needs to have regard to in the next steps for Committee meetings. This has also been reflected in the government guidance on the safe use of council buildings.

- Ultimately it is for local authorities to apply the Covid-19 guidance to ensure meetings take place safely.
- Consider the use of existing powers to delegate decision making to key individuals such as the Head of Paid Service, as this can be used to minimise the number of meetings needed.
- Consider relying on single Member decision making without the need to convene Cabinet.
- Consider bringing forward the Annual General Meeting.
- Encourage the use of remote access to minimise the need for the public to physically attend the meetings.
- A consultation has been launched which calls for evidence on the use of the current arrangements and to gather views on whether these should be permanent arrangements.

3.2 In addition the accompanying guidance has also confirmed the following:

- Strongly encouraged to wear face coverings in enclosed public spaces where social distancing may be difficult and where you come into contact with people you do not normally meet.
- Local authorities to consider whether each meeting needs to continue for the local authority to operate, if it does not then it should consider cancelling these meetings.
- Where elected Members, officers and others attend physical meetings, social distancing must be maintained.
- Only absolutely necessary participants should physically attend meetings i.e. the decision makers.
- Meeting rooms should be equipped with hand sanitiser, floor signage, and be well ventilated.
- Members should not share pens, documents and any other objects.
- Where this cannot be maintained it should be considered whether the meeting can be redesigned to maintain a 2-metre social distance or 1 metre with mitigations. These could include further increasing the frequency of hand washing & surface cleaning, keeping the meeting time as short as possible, using screens or barriers to separate people from each other and using back to back, or side to side working (rather than face to face).
- Social distancing applies to all areas of the building and Members should be reminded to observe this at all times.
- Local authorities that require additional space for essential meetings can hire function & event space at permitted venues, however this should not be done for non-essential meetings.

3.3 The Government has announced a consultation into how remote meetings might resume. Such a resumption would require primary legislation and is unlikely to be in place during this calendar year. In the meantime most formally constituted meetings can only be held in person.

3.4 Whilst all meetings have been held remotely Council Staff and members participate in a number of different types of meeting:

- Executive Meetings like Cabinet and Council
- Quasi-Judicial Meetings like planning & licencing
- Scrutiny Panels & Working Groups

- Policy Panels
- Informal Member Officer Briefings
- One to One meetings

These meetings have different sizes, lengths, public or member participation, significance and different requirements to be broadcast. In devising a way forward for in person meetings, an approach that recognises the different circumstances and status of each type of meeting needs to be considered,

- 3.5 The following table sets out at a high level how physical meetings were held prior to Covid, and how remote meetings have been held over the past year.

In Person Meetings - pre-Covid	Remote Meetings
<ul style="list-style-type: none"> - Officers in the room - Members in the room - Public attendance in person - Public speaking in person (written rep allowed at some meetings) - Media in the room - No live streaming - No remote access to meetings - Presentations on a projector in the room 	<ul style="list-style-type: none"> - Officers on zoom (whatever location necessary) - Members on zoom (all from home apart from Chairman for assistance) - Public attendance through viewing on YouTube - Public speaking through Zoom invite (also some written reps) - Use of live streaming – You Tube - Use of remote access – Zoom - Presentations through Zoom

4. Proposed action

- 4.1 In order to ensure that the Council meets the requirements going forwards in a balanced way the following is proposed for the time being, subject to a continuous review in the light of changing circumstances, legislation and public health conditions.
- 4.2 To ensure the Council is able to respond to changing circumstances it is recommended that Council establishes a working group of members comprising committee Chairs with political representation from minority groups to keep procedures, policies and standing orders under review.

The Council will publish a maximum room capacity for the building and each meeting space commensurate with the risk profile.

The members that are appointed to the committee or their substitutes will physically be located in the room and then only up to the maximum room limit.

It is proposed that such Committee Officers as are necessary are in the room when the meeting is taking place to ensure the smooth running of the meeting – it is likely that there will need to be at least two officers to achieve this as presently with remote meetings.

Members who are non-decision makers will have the ability to participate remotely into the meeting by video, telephone conference or written representation or to participate subject only to the space capacity

Other officers will have the ability to dial into the meeting or attend in person, this will be dependant on the maximum occupancy within the room

Pursuant to equality impact legislation, there may be limited circumstances where, particularly for quasi-judicial meetings, it will be expedient to invite directly impacted persons to attend in person so that their circumstances can be taken into account. In this case there will be risk-based conditions applied to social distancing, mask wearing or any other precautionary actions.

Public and media viewing will continue through live streaming to YouTube only. Public viewing will not be accommodated in the council building. The Council will need to procure appropriate equipment to enable this which is currently being investigated but members are asked to appreciate it is unlikely be of a broadcast-standard quality.

Public speaking will be possible through three options, with each option written notice must be given to the Committee Team two clear working days in advance. The requirement for this will be confirmed on the agenda, and the standing orders will be updated to reflect this (see appendix A). Committee clerks will have discretion to ensure that representatives holding opposing views will have their chance to participate and it will not just be a case of first come first served.

1. Remote attendance will be possible through the Zoom link.
2. Where In person attendance is appropriate it will be subject to priority and capacity limits - once capacity is reached for the room being used, this option will closed and not be possible for any more members of the public wishing to speak to attend in person. Standing orders will be modified to allow the Chairman to regulate the number of people attending the meeting having regard to prioritising decision makers and committee clerks, local members, those with a direct interest over those with a general or non specific interest. A one-in, one-out procedure is likely to apply.
3. Written representation will be possible.

Consistent with the overarching capacity constraints in the room and the building more generally, where multiple members of the public wish to speak there will be additional procedures so that, for example, in Development Management Committee places are reserved for supporters, objectors, parishes etc. The agenda will be timed so that applications can be considered with public speaking managed through appointment times to enable a rolling programme of speakers. Once the application has been heard all those

registered to speak must leave, the meeting will be paused and this will enable the cleaning of equipment and surfaces in between each set of speakers.

Officers will work with the Chairman to anticipate room capacities and, if necessary a venue change at short notice may be required but cannot be guaranteed,

Where presentations are provided to the Committee these will be both through the projector in the room and through the Zoom platform.

The meeting room is to be used only for the meeting, those attending are required to arrive promptly and leave promptly. The room will then be cleaned immediately after use.

Members are requested to not gather before or after the meeting, to observe the Covid secure measures in place in the building and to keep the meeting on point.

Members and guests/speakers are requested to wear face coverings when moving around the building, unless there is a relevant exemption. Lateral flow tests will also be encouraged.

For the time being, the maximum capacity with the Council Chamber is considered to be 20 including the balcony, Appendix B shows the layout which enables this. It is proposed that this is the only room that is used for Committee meetings. Where a larger room is needed, for example for Full Council an alternative venue will be sought.

The Chamber will be set up to ensure side to side working, rather than face to face working when in the meetings.

The Monitoring Officer will review the schedule of meetings to ensure that only business critical meetings occur over the forthcoming months, to help to manage the associated risks to Members and Officers. This will be discussed with the Leader in this first instance and also the appropriate Chairman of each Committee.

- 4.3 The standing orders will be reviewed and updated to reflect these changes as appropriate, as outlined in Appendix A.
- 4.4 To complement this report guidance will be issued to all Members, and to ensure there is public awareness guidance will be added to all agendas and will be included on our website and social media channels.

5. Other options

- 5.1 A further option for the Council to consider is the further risk mitigations as outlined in the guidance, using screens or barriers to separate people from each other.
- 5.2 In adopting the proposal as outlined in section 4 the Council are meeting the guidelines as set out by central government. The only exception being the use of (dividing) screens. The Council needs to be aware of the public perception of this and whether Members and Officers would be comfortable with this practice. Cabinet are asked to consider whether to proceed with this as an approach, which would enable those in the Council Chamber to be placed less than 2 meters apart.

6. Issues and risks

- 6.1 **Resource Implications** – it is proposed that this can be managed by the Committee Team, however this will need to be kept under review. The IT team are currently reviewing equipment to enable live streaming to continue, it is proposed that this can be bought from existing budget due to proposed low cost in the interim period.
- 6.2 **Legal Implications** – the report is in line with the legislation that will be in place from 7 May 2021.
- 6.3 **Equality Implications** – solutions for public viewing will be in line with the equalities guidance to ensure access for all.
- 6.4 **Environmental Impact** – with only the decision makers in the room and key officers, the Council will continue to reduce its carbon footprint.
- 6.5 **Crime and Disorder** – not applicable to this report.
- 6.6 **Risks** – as outlined in the report and as documented and mitigated in the Council's Covid risk assessment.

7. Conclusion

- 7.1 The Council have been faced with a challenge in the current environment to cease with virtual / remote meetings and return to these In Person, this report provides the Council with a practical solution.

8. Recommendations

Cabinet to:

- 8.1 Note the guidelines and protocols for In Person meetings from the 7 May 2021.
- 8.2 Recommend to Full Council the subsequent amendments to the standing orders as a result of adopting this approach and as outlined in Appendix A.
- 8.3 Note the proposal to set up a Committee of chairs to manage capacity/priority.
- 8.4 Recommend to Full Council to delegate to the MO in consultation with the Committee of Chairs the ability to amend the standing orders as required in this regard.

Appendix A

Part 4.5 Standing Orders and Right of the Public at Meetings

G Public Speaking at Committees

G1 General Arrangements for Public Speaking

- G1.1 With the exception of any Committee in respect of which the right is from time to time removed by Council and in respect of enforcement matters and confidential or exempt business at any Committee, and generally subject to other paragraphs of this document and of the Council's Standing Orders, the public may speak at Committees of the Council. **The right to speak is provided however they must register with the Democratic Services Team two full working days in advance of the meeting.**

Each committee meeting / agenda item if required will have a quota for the number of public allowed to physically attend the meeting in person. Those quotas will be published on the relevant agendas.

Once the quota for public speaking is reached, members of the public will be advised and offered the right to speak through written representation or by joining the meeting remotely via a video link. The member of the public, when in the meeting must first identify themselves, say where they live and whom they represent.

To ensure that the widest spectrum of views is presented to the meeting, in consultation with the Chairman, officers may allocate speaking rights to interest groups [for example, supporters or objectors] and members of the public may need to identify their interest in the proceedings to assist this commensurate with the capacity limit of the meeting.

- G1.2 Early in the meeting or before each item, the Chairman will invite people who wish to speak on any item to identify themselves and indicate whether they wish to support or oppose the officer recommendations. Alternatively anyone wishing to speak should indicate this to the Chairman when the particular item is reached by raising her/his hand and where appropriate saying clearly "I wish to speak for/ against the officer recommendation (or to the application if that is what is being discussed) on this item."
- G1.3 The Chairman will invite those who are to speak to move to a point set aside for public speaking.
- G1.4 Representatives from parish councils will together, be allowed 5 minutes to speak on the item in question.
- G1.5 The objectors to the officer recommendation (or to the application, as the case may be) will, together have 5 minutes to speak on the item. Unless those wishing to speak collectively indicate that they wish otherwise, the person who first indicated her/his wish to speak will be invited to speak first within the 5 minutes allocation.
- G1.6 Supporters of the officer recommendation (or of the application, as the case may be) will be allocated 5 minutes in total. Unless those wishing to speak collectively indicate that they wish otherwise the person who first indicated her/his wish to speak will be invited to speak first within the 5 minute allocation.

- G1.7 Any member or officer of the District Council may ask questions of any speaker but they should be confined to points of clarification or material consideration. No member of the public may question any other speaker.
- G1.8 The Chairman has discretion to increase the time allowed and the number of speakers in cases of exceptional interest.
- G1.9 The failure of any person to attend and exercise the right to speak will not by itself affect the right to speak for any other person.
- G1.10 After the item has been resolved, all speakers for that item should leave the public speaking area.
- G1.11 The right of the public to speak (or indeed to attend) does not apply to business in respect of which a resolution to exclude the press and public for the consideration of confidential or exempt business has been carried.

Appendix B





Proposals for additional Environmental Enforcement

Report Author(s): Nick Howard
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Portfolio: Clean and Safe Environment

Ward(s) Affected: All wards

Purpose of the Report:

To present for decision proposals for delivery of additional Environmental Enforcement capacity and a corresponding additional allocation of £50k in the revenue budget from 2021-22 onwards, further to the resolution of Cabinet on 8th March 2021 to receive a further report.

Recommendations:

1. Cabinet to agree to establish a permanent post of Environmental Enforcement Officer and to pilot Case Support Officer capacity as a short-term contract, described in Option 2, and additional revenue funding of £50k from 2021-22 onwards for this purpose.
2. Cabinet to agree to delegate to the Assistant Director Regulatory, in consultation with the portfolio holder for Clean and Safe Environment, the prevailing priorities for environmental enforcement for the additional resources within the scope of this report.
3. The Assistant Director Regulatory to review the achievements of the additional environmental enforcement capacity regularly in consultation with the portfolio holder for Clean and Safe Environment, and provide a report of progress against policy to Economy and Environment Policy Committee within 12 months.

1. Summary

- 1.1 Council meeting on 8th February 2021 discussed needs for environmental enforcement and it was recognised that additional revenue funding may need to be earmarked. Cabinet resolved that a report be brought forward to a future meeting.
- 1.2 This report offers proposes the additional environmental enforcement capacity and seeks agreement on how it will be established and focussed in operational delivery. This will help to implement with high impact our existing commitments made in South Norfolk Council's Environmental Strategy to protect and improve our environment. It will also help us to maximise the achievement of specific Delivery Plan commitments to protect our environment.
- 1.3 Faced with many and diverse public viewpoints on environmental priorities, the council has made specific enforcement and environmental strategy commitments. These commitments provide focus for the additional enforcement capacity that has been funded. Separate reports will be brought forward to support wider implementation of the Environmental Strategy, to deal with other aspects of enforcement, and pursue action to address foreseeable flooding threats.

2. Background

- 2.1 The council has regulatory powers to tackle environmental offending under a range of legislation including the Environmental Protection Act 1990, Environment Act 1995, Clean Neighbourhoods & Environment Act 2005 and associated regulations as well as using anti-social behaviour powers and tools when appropriate.
- 2.2 Recognising both the need to protect South Norfolk's high-quality environment and public concerns about environmental offending broadly and fly tipping in particular, the council's Environmental Strategy published during 2020-21 contains a range of commitments for improving our local environment. Existing commitments include:
 - a) A zero tolerance approach to Environmental Crime from fly tipping to dog fouling with a combination of fines for offenders and educating the public
 - b) Adopting the best new technology and methods to effect behaviour change, design safe and attractive streets, and stop littering and fly tipping before it happens and take rapid action when it does
 - c) Working more closely and sharing intelligence with the Police, National Farmers Union and the Environment Agency to tackle Environmental Crime.
- 2.3 Reflecting community concerns about environmental offending, the council's enforcement responsibilities and Environmental Strategy commitments, our Delivery Plan 2021/22 contains specific commitments to:
 - a) Review and update specific enforcement policies,
 - b) Pilot smarter multi-agency working including intelligence-led approaches,

- c) Review and refocus the regulation of environmental crime, with a particular focus on fly tipping, and
 - d) Deliver a full programme of regulation and interventions making a measurable difference to the problems facing our communities.
- 2.4 Whilst the council has no enforcement powers over maintenance of riparian watercourses, Scrutiny Committee has recently identified scope for increasing the capacity of the Water Management Officer post where the current post holder is retiring shortly. This offers an opportunity to increase our capacity for local flood risk investigation, advice and liaison work including preventative work. This will be explored separately outside the scope of this report.

3. Current position/findings

- 3.1 Environmental offences of particular concern to our residents include fly tipping, littering, and failing to clear up dog fouling. Hundreds of incidents are reported, investigated, and cleared up each year in South Norfolk. Fly-tipping is the single most common environmental offence reported locally.
- 3.2 Enforcement decisions and action are taken following investigation wherever there is sufficient evidence to identify the offender beyond reasonable doubt. The council's regulatory powers include powers of entry, investigative measures including detention and seizure, requiring cooperation with officers, statutory notices, fixed penalty notices and the power to prosecute for offences. The additional enforcement capacity will significantly strengthen our capacity to prevent and detect offences, and to identify and deal with the offenders.
- 3.3 Opportunities have been identified to coordinate and add muscle to the councils' various enforcement resources.
- 3.4 A review of environmental enforcement needs has concluded that the measures contained in Appendix 1 will strongly and positively deliver the council's environmental enforcement commitments. As a result, deterrence of fly-tipping should be measurably improved and we will have greater success catching those who persist in environmental offending.
- 3.5 The main focus proposed for the additional resources is to establish a dedicated environmental enforcement officer (at salary band F) working flexible patterns in close partnership with other enforcement agencies:
- a) Leading a high-profile public campaign designed to maximise awareness, prevention, and deterrence so that there can be no excuse for fly-tipping or waste offences
 - b) Maximising the early detection of new incidents, and the speed of investigation and evidence gathering
 - c) Driving early interventions, deliver warnings and enforcement
 - d) Gathering intelligence and profiling potential offenders for special attention
 - e) Implementing enforcement tactics and strategies designed to disrupt and deter serious and repeat offending

A significant increase in numbers of enforcement actions can be expected, and publicity of this will help to deter future offenders.

- 3.6 The second focus proposed for the additional resources is to pilot a Case Support officer role, on a temporary contract, tasked with:
- a) Coordinating and optimising fixed penalty notice and prosecution practices across the council's regulatory services to increase enforcement capacity and impact
 - b) Modernise prosecution practices, drive efficient and rapid prosecutions where appropriate, and help to maximise success rates and minimise legal costs
 - c) Support managers and assistant directors with reviewing and sharpening up enforcement decision-making
- The approach of employing a Case Support officer on short contract has been tested elsewhere, releasing enforcement capacity and increasing offender detection rates and numbers of enforcement actions.

4. Proposed action

- 4.1 Based on the current position above, two options have been identified to deliver additional high impact environmental enforcement.

Option 1: Full-time environmental enforcement officer

- 4.2 Option 1 is to establish a full-time post and employ a highly skilled Environmental Enforcement Officer. Including all on costs, this would amount to £44k plus £6k to fund investigation support and enforcement case support, bringing the revenue budget additional requirement total to £50k annually as at 2021-22. This option would maximise the on-duty staff time of the dedicated enforcement officer. On the downside however it would potentially leave insufficient resources to cope with the increase in office-based enforcement case support work (evidence management, file building, case management and wider enforcement support). The risk is that case support work would tie up the enforcement officer inefficiently as a result of successfully detecting and dealing with offenders.

Option 2: Environmental enforcement officer plus case support officer

- 4.3 Option 2 is to establish a part-time post 30 hours per week (£35k including all on costs) and £15k to commit to efficient, specialist case support work piloted using a short-term contractor at relatively low cost. The total revenue budget additional requirement would total £50k annually as at 2021-22. The council would still employ a highly skilled Environmental Enforcement Officer, and potentially with no less field work and enforcement contact time. However, the rate of progress in taking formal enforcement through the legal process would be higher, and the sharpening up of the council's enforcement practices and tactics would potentially lead to wider increases in enforcement capacity and case numbers.

5. Other options

- 5.1 Cabinet could decide to establish the additional environmental enforcement capacity differently, with a broader remit or alternative priorities. The downside of this may be to dilute the capability of the role or create difficulty in attracting and recruiting suitable applicants for a role that is less clear-cut or achievable.

- 5.2 No specific further options have been identified that would be viable and closely aligned with priority enforcement aspirations, needs expressed in service demand, and the priorities contained in the Environmental Strategy.

6. Issues and risks

- 6.1 Either of the two options presented in this report will provide a substantive increase in capacity for responsive, high impact environmental enforcement. A focussed, achievable remit for a dedicated Environmental Enforcement Officer should enable relatively straightforward recruitment of a suitably experienced and highly skilled officer. If alternatively, the decision were taken to widen the role, it would become significantly more difficult to recruit to and deliver successful achievements. The need identified to strengthen enforcement across the council's regulatory services would be favoured by the greater case support capacity contained in Option 2.
- 6.2 **Resource Implications** – Cabinet considered a revenue budget paper on 8th February and it was recognised that additional revenue funding may need to be earmarked against an additional £436k in balances to resource additional environmental enforcement. The proposals contained here amount to an additional £50k revenue budget sum, which would need to be added to the revenue budget going forwards from 2021-22 onwards.
- 6.3 **Legal Implications** – The additional enforcement capacity proposed in this report carries conventional regulatory and enforcement implications which are well understood. Successful delivery is likely to increase the requirement for legal support but, depending which option is supported, the resource implications and case administration and case management requirements (excluding legal costs) could be accommodated within the budget proposed to a lesser (Option 1) or greater (Option 2) extent. A strong awareness and deterrence campaign as proposed will help to minimise the need for and costs of enforcement. The Monitoring Officer has been consulted and offers no adverse comments. No need has been identified for specific legal advice.
- 6.4 **Equality Implications** – No specific impact has been identified on any individuals/groups on grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion/belief, sex, or sexual orientation.
- 6.5 **Environmental Impact** – The proposals contained in this report directly address protection of the environment and are beneficial.
- 6.6 **Crime and Disorder** – The proposals contained in this report directly address crime and disorder and are beneficial.
- 6.7 **Risks** – References to increased enforcement robustness may not be universally supported and may give rise to adverse perceptions for some people in our communities. Our regulatory services and community groups are finding, however,

positive community support for enforcement and particularly on the subject to fly tipping.

7. Conclusion

- 7.1 Option 2 is the preferred option because it offers a strong additional environmental enforcement capacity together with a substantive case support capacity which will cater for the efficient management of enforcement.
- 7.2 Whilst Option 1 would maximise environmental enforcement field officer time, it would potentially create a significant office-based requirement for case-building time. This would not be a negative factor in itself, however it may be less efficient ultimately than Option 2 as it would not offer the increased scope for also strengthening the council's enforcement across the board. The proposal in Option 2 to pilot a Case Support officer capacity on temporary contract is within the budget proposed.

8. Recommendations

- 8.1 Cabinet to agree to establish a permanent post of Environmental Enforcement Officer and to pilot Case Support Officer capacity as a short-term contract, described in Option 2, and additional revenue funding of £50k from 2021-22 onwards for this purpose.
- 8.2 Cabinet to agree to delegate to the Assistant Director Regulatory, in consultation with the portfolio holder for Clean and Safe Environment, the prevailing priorities for environmental enforcement for the additional resources within the scope of this report.
- 8.3 The Assistant Director Regulatory to review the achievements of the additional environmental enforcement capacity regularly in consultation with the portfolio holder for Clean and Safe Environment, and provide a report of progress against policy to Economy and Environment Policy Committee within 12 months.

Background papers

- 1. Environmental Strategy as published 2020 on the council's website.

Appendix 1

Environmental enforcement proposals

What we do already:

- i. Respond to new reports such as fly-tipping, dog fouling, littering and pollution.
- ii. Examine available evidence including dumped wastes.
- iii. Pursue investigations to identify offenders.
- iv. Challenge, warn and enforce against offenders.
- v. Piloting surveillance cameras to catch offenders in hotspots.
- vi. Developing close working with police on environmental crime and enforcement.

Focus for the additional environmental enforcement post:

- A. Fly tipping (85% plus of the time)
- B. Dog fouling
- C. Littering
- D. Unlawful deposit of wastes causing pollution

What the additional environmental enforcement resources will enable us to do:

1. More capacity possible for intelligence gathering and analysis.
2. Focus special attention on key fly tipping hot spots in consultation with local communities.
3. Respond faster to fly tipping incidents and maximise evidence gathering / offer community strong reassurance.
4. Target hardening in liaison with landlords, landowners, and local communities.
5. More capacity to proactively patrol and detect offending (and deal with locations at high risk of offending before it happens).
6. Run a strong campaign to maximise deterrence of offending and cultivate public 'eyes and ears'.
7. Apply greater capacity further across the full range of investigation measures and enforcement sanctions for wastes offending:
 - a) Residential and business wastes 'duty of care'.
 - b) Fly tipping fixed penalty notices and prosecutions (including section 108 'failure of cooperation' prosecutions).
 - c) Employ a range of disruption tactics to deal with repeat and persistent offenders e.g. stop and search / vehicle seizure.
8. Further make use of ASB tools and powers to tackle wastes offending.
9. Look at wider causes, patterns and ways to:
 - a) Turn people away from fly-tipping.
 - b) Profile offenders and refine our disruption, investigation and enforcement tactics (e.g. unlawful rubbish removers operating for profit).
10. Proactively detect and deal with those suspected of unlawful waste carrying.

CABINET CORE AGENDA 2021

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
19 Apr		Norfolk Strategic Planning Framework Update 2021	Paul Harris	Lisa Neal	
		Review of Policies	Rodney Fincham	Josh Worley	
	Key	Poringland Neighbourhood Plan	Richard Squires	Lisa Neal	
		Public Sector Equality Duty Annual Report	Linda Mockford	Josh Worley	
		In Person Meetings	Emma Hodds	Josh Worley	
	Key	Lease for Car Parking at Norwich Research Park	Nina Cunningham	Lisa Neal	Exempt
	Key	South Norfolk Use of the Strategic Fund	Tig Armstrong	John Fuller	Exempt
	Key	Ella May Barnes Building	Tig Armstrong/ Nina Cunningham	Lisa Neal	Exempt
		Breathing Space Legislations	Rodney Fincham	John Fuller	
	Key	Covid Recovery Plan	Rodney Fincham / Leigh Booth	John Fuller	
	Key	HR and Payroll Services	Emma Hodds	Josh Worley	Exempt
	Key	Internal Audit Consortium	Emma Hodds	Josh Worley	Exempt
		Council AGM 17 May 2020			
1 Jun		Re-design of Care and Repair and Disabled Facilities Grant service element of Integrated Housing Adaptations Team	Leah Booth/ Kevin Philcox	Yvonne Bendle	
		Tree Management Policy	Tig Armstrong	Lisa Neal	
	Key	Review of Bawburgh Temporary Stopping Place for Gypsies and Travellers	Kevin Philcox/ Leigh Booth	Yvonne Bendle	
		Q4 Performance, Risk and Finance Report	Sinead Carey	Josh Worley	
		Empty Homes Policy and Discretionary Enforcement Policy	Kevin Philcox/ Victoria Parsons	Yvonne Bendle	
	Key	Poringland Neighbourhood Plan: Decision to Proceed to Referendum	Richard Squires	Lisa Neal	
		Customer Satisfaction Strategy	Charis Brown/ Shaun Crook	John Fuller	
		Review of Materials Recovery Facility Contract	Simon Phelan	Michael Edney	

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
5 Jul		Anti-Social Behaviour Strategy and Enforcement Policy	Nick Howard/ Tony Cooke	Michael Edney	

Key decisions are those which result in income, expenditure or savings with a gross full year effect of £100,000 or 10% of the Council's net portfolio budget whichever is the greater which has not been included in the relevant portfolio budget, or are significant (e.g. in environmental, physical, social or economic) in terms of its effect on the communities living or working in an area comprising two or more electoral wards in the area of the local authority.