

Cabinet Agenda

Members of the Cabinet:

Cllr J Fuller (Chairman)

Cllr K Mason Billig (Vice Chairman)

Cllr M Edney

Cllr R Elliott

Cllr L Neal

Cllr A Thomas

Cllr J Worley

Leader, External Affairs and Policy

Governance and Efficiency

Clean and Safe Environment

Customer Focus

Stronger Economy

Better Lives

Finance and Resources

Date & Time:

Monday 19 July 2021

1.00 pm Please note change to time

Place:

Council Chamber, 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 / PUBLIC SPEAKING:

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Public speaking can take place:

- Through a written representation
- In person at the Council offices

Please note that due to the current rules on social distancing, the Council cannot guarantee that you will be permitted to attend the meeting in person. There are limited places in the Council Chamber and the numbers of public speakers permitted in the room will vary for each meeting.

All those attending the meeting in person must, sign in on the QR code for the building and arrive/ leave the venue promptly. The hand sanitiser provided should be used and social distancing must be observed at all times. Further guidance on what to do on arrival will follow once your initial registration has been accepted.

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 5)

4. To confirm the minutes from the meeting of Cabinet held on 1 June 2021

(attached - page 7)

- 5. Greater Norwich Local Plan (GNLP) Submission to the Secretary of State for Independent Examination (report attached page 19)
- 6. Long Stratton Neighbourhood Plan Consideration of Examiner's Report

(report attached – page 78)

- 7. Adoption of Conservation Area Appraisals and Boundary Amendments for Burston, Forncett, Gissing, Thorpe Abbotts, Winfarthing and Wramplingham

 Conservation Areas (report attached page 109)
- 8. Moving Towards a First-Class Customer Service

(report attached – page 247)

9. Skills and Training Project

(report attached – page 277)

10. Emergency Planning Structures

(report attached – page 301)

11. Insurance Contract – Request for Delegation to Award

(report attached – page 307)

12. Pensions Discretion Policy

(report attached – page 310)

13. Cabinet Core Agenda

(attached – page 320)

14. 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)

15. Finance System Business Case

(report attached – page 322)

16. ICT and Digital Strategy Review

(report attached – page 330)

17. Shared Procurement Service Business Case

(report attached – page 360)

Agenda Item: 3

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.

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.

Does the interest directly:

- 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

If the answer is "yes" to any of the above, it is likely to be pecuniary.

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.

Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?

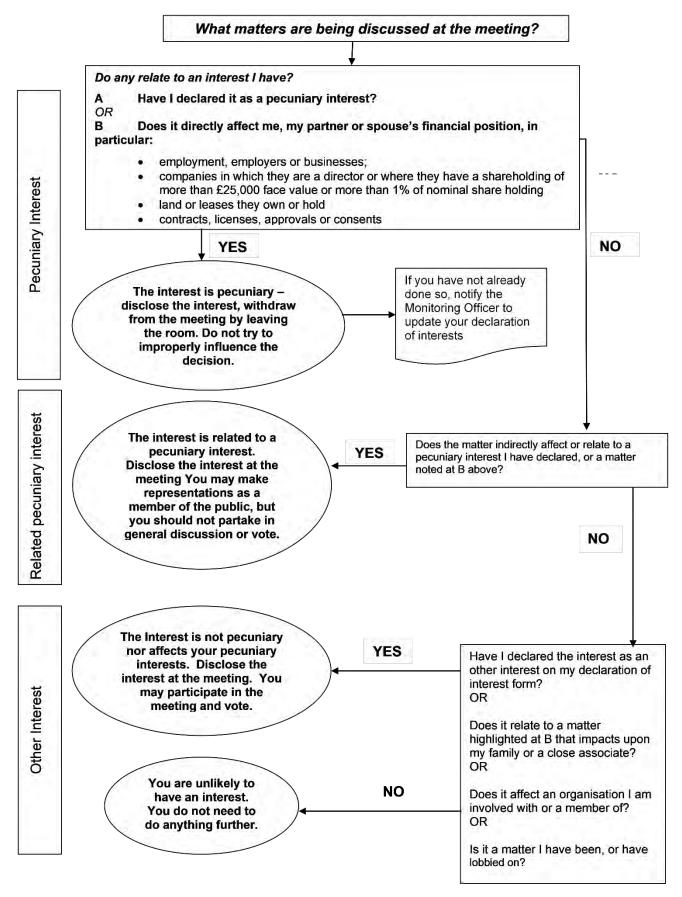
If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but you should not partake in general discussion or vote.

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.

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.

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 meeting of the Cabinet of South Norfolk Council, held on Tuesday 1 June 2021 at 9.00am.

Committee Members

Present:

Councillors: J Fuller (Chairman), R Elliott, K Mason Billig, A Thomas and J Worley

Apologies for

Absence:

Councillors: M Edney and L Neal

Other Members in

Attendance:

Officers in Attendance:

Councillors: D Bills, F Ellis and T Laidlaw

The Director of Place (P Courtier), the Director of People and Communities (J Sutterby), the Director of Resources (D Lorimer), the Chief of Staff (E Hodds), the Assistant Director Economic Growth (T Armstrong), the Assistant Director Planning (H Mellors), the Assistant Director Regulatory (N Howard), the Place Shaping Manager (P Harris), the Strategy and Programme Manager

(S Carey),the Principal Infrastructure and Planning Policy Officer (S Marjoram) and the Housing Standards Senior

Manager (K Philcox).

Also in Attendance:

Mr D Gooderham of Bawburgh Parish Council (for part of

the meeting)

2900 DECLARATIONS OF INTEREST

With regard to item 10, the Empty Homes Policy, Cllr A Thomas declared an "other" interest as having been personally impacted by the recent flooding in the District and having to vacate her home.

2901 MINUTES

Cllr R Elliott explained that he had attended the Cabinet meeting held on 19 April 2021 (as a non-Cabinet member), however this had been omitted in the draft minutes.

Subject to this correction, the minutes of the meeting of the Cabinet held on 19 April 2021 were agreed as a correct record.

2902 SOUTH NORFOLK VILLAGE CLUSTERS HOUSING ALLOCATIONS PLAN – REGULATION 19 CONSULTATION

Members considered the report of the Place Shaping Manager, which sought Cabinet's agreement for the Regulation 18 version of the South Norfolk Village Clusters Housing Allocations Plan (VCHAP), to go out for consultation for a period of 8 weeks.

The Chairman introduced the item, reminding members of the background to the report and advising that the aim of the VCHAP was to deliver sustainable growth within the villages of South Norfolk. The Plan sought to fulfil the requirement in the Greater Norwich Local Plan, to allocate 12,000 new homes across the 48 village clusters. He hoped that by bringing new homes in to the villages it would help to build vitality and sustainability to the settlements, providing local jobs and protecting services. He hoped that with development sizes of 12 -24, a housing mix could be determined for each site, to suit all needs.

The Place Shaping Manager outlined his report explaining that sites had been assessed in accordance with the agreed criteria, taking in to account a range of different factors. Members noted that the consultation document included details of all sites that were "preferred", "shortlisted" or "rejected". Consideration had also been given to the Sustainability Appraisal that had been prepared independently alongside the Plan, and members were referred to paragraph 3.5 of the report which detailed the reasons for the "balanced" strategic approach in distributing development across the village clusters. Members also noted that there were four settlements, Burston, Roydon, Scole and Dickleburgh, where sites were being allocated through their own Neighbourhood Plans.

Cllr F Ellis, the Chairman of the Regulation and Planning Policy Committee, expressed her support for the document, explaining that over 450 sites had been assessed, resulting in 66 "preferred sites" and 24 shortlisted "reasonable alternatives". She thanked officers and members of the Policy Committee for their work and positive contributions in assessing the sites and developing the Plan, and she hoped that the proposed consultation would attract new sites coming forward.

Cabinet agreed that village locations were now becoming a more attractive place to live and recognised the importance of growth and development to ensure their sustainability. Members welcomed the opportunity for the smaller settlements to grow proportionally and with care, and thanked officers for the level of care and detail that had gone in to the assessment of sites.

RESOLVED

To:

- 1. Publish the draft South Norfolk Village Clusters Housing Allocations Plan (Appendix A) and the accompanying supporting documents for eight weeks consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012; and,
- 2. Delegate authority to the Assistant Director for Planning, in consultation with the Portfolio Holder for External Affairs and Policy, to make any minor factual amendments to the consultation document (Appendix A), prior to consultation being begun.

The Reason for the Decision

To seek views on the suggested content of the proposed objectives and policies, in accordance with the Council's Statement of Community Involvement, and to invite further sites for consideration.

Other Options Considered

To postpone the consultation

2903 UPDATE TO LOCAL DEVELOPMENT SCHEME

Members considered the report of the Place Shaping Manager, which highlighted amendments to the current Local Development Scheme (LDS) to reflect changes to the timetable for the South Norfolk Village Clusters Housing Allocations Document.

The Place Shaping Manager outlined his report explaining that it was a statutory obligation to ensure that the LDS was kept up to date, and he referred members to the proposed new timetable at Appendix 1 of the draft LDS.

RESOLVED

To:

RECOMMEND THAT COUNCIL approves the proposed amendments to the current Local Development Scheme

9

The Reason for the Decision

To ensure that the latest timetable for the production of the South Norfolk Village Cluster Housing Allocation Document is properly reflected in the LDS

Other Options Considered

None

2904 COVID-19 RECOVER PLAN 2021 - 2022

Members considered the report of the Director of People and Communities, which provided an update on the proposed actions contained within the new Covid-19 Recovery Plan 2021-2022 and detailed the source and amount of funding required to support an effective recovery for communities, businesses and the Council.

The Director of People and Communities introduced the report, and referred members to Appendix A, which detailed the various funding streams made available to the Council, and how the Council sought to allocate them.

The Assistant Director Economic Growth advised that a suite of funding streams had been made available to support the economy, through both central government and more localised sources. Officers were developing a new Economic Growth Strategy and were looking at ways the Council could revise its current approach to business support, identifying any gaps and developing programmes to fill these gaps where possible.

Members' attention was drawn to the need to increase resources in some areas and recognised the increase in demand in areas such as Housing and Benefits. Some members expressed concern that the peak of pressure on such services was yet to come.

Members expressed their appreciation for the government funding received and expressed their thanks to the volunteer groups who had assisted in so many ways and helped to create a real sense of community throughout settlements.

RESOLVED

To Approve:

1. The proposed actions as set out in the attached Covid-19 Recovery Plan 2021-2022.

 The indicative sums set out in Appendix A and the table at 4.4 to provide further support to the Covid-19 recovery, and to delegate to the relevant Director, in consultation with the appropriate Portfolio Holder in order to utilise the funding flexibly and to ensure the greatest impact.

The Reason for the Decision

To facilitate the delivery of an effective recovery from the impacts of the pandemic.

Other Options Considered

None

2905 REOPENING THE HIGH STREETS SAFELY AND WELCOME BACK FUNDS

Members considered the report of the Programme Manager for Economic Growth, which sought approval to accept a Grant Funding Agreement which would enable the Council, working with Broadland District Council, to draw funding allocated from the Reopening the High Streets Safely Fund (£246,044) and Welcome Back Fund (£242,044).

The Assistant Director Economic Growth presented the report, explaining that the funding available was to be split between South Norfolk and Broadland Councils, to ensure the safe and successful re-opening of the high streets, as the Council continued to respond to the economic impacts of Covid-19. Members noted that these funds could be spent on temporary measures only and that acceptance of the grant would enable the Council to recover its costs already incurred from June 2020 onwards through the "Confidence" and "Pleased to see you" campaigns.

The Chairman expressed his support for the recommendations, stressing that any support for smaller shops on the high street, and instilling confidence in shoppers, should be welcomed.

RESOLVED

To:

 Accept grant funding from the Secretary of State for Housing, Communities and Local Government for the Reopening the High Street Safely Funding and Welcome Back Fund, for the amounts of £246,044 and £242,044 respectively.

- 2. Accept the funding agreement terms and conditions, as set out by the Secretary of State for Housing, Communities and Local Government for the Reopening High Street Safely Fund.
- 3. Delegate to the Director of Place in consultation with the Portfolio Holders for Stronger Economy and Finance and Resources, to incur expenditure which support activities consistent with the scope of the funding.

The Reason for the Decision

To support the delivery of a safe and successful high street reopening, as the Council continues to respond to the economic impacts of Covid-19.

Other Options Considered

None.

2906 STRATEGIC PERFORMANCE, RISK AND FINANCE REPORT FOR **QUARTER 4 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 4, against the key outcomes set out in the Delivery Plan for 2020/21.

The Director of Resources outlined the Council's financial position for quarter 4, referring to the Council's response to the pandemic and the financial support given to individuals and businesses, and also that received by the Council.

Members' attention was drawn to the table at paragraph 3.3 and the Director of Resources explained that the £1.072m carry forward would be placed in an earmarked reserve to fund the Covid Recovery Plan for 21/22. She also outlined the impact of Covid on the Council's substantive services.

Members noted that proposals also included a new Leisure Services Recovery Reserve and were reminded that the Council agreed back in February to financially support the leisure service up to £2.5m over 3 years, to assist in its recovery. Members also noted that £0.5m had been set aside in a proposed earmarked Waste Reserve, to support the service and potential changes to waste as detailed in the recent Government White Paper.

Turning to the Capital Programme, the Director of Resources was pleased to report that despite Covid, 80% of the budget had been spent for 202/21, and she referred Cabinet to the slippage requests at paragraph 3.32.

Cllr R Elliott explained that the leisure service aimed to increase membership levels back to what they were prior to Covid, and although early days, he was optimistic that levels would increase as more people were vaccinated, and

Winter approached. He wanted to personally thank the leisure team for all their hard work, and for remaining so flexible over the last 12 months, working not only in other areas of the Council, but also for the NHS. The Director for People and Communities added that he was immensely proud of the leisure staff and their adaptability.

Cllr J Worley suggested that the figures in the report demonstrated the Council's past and future commitment to residents. The Council had remained cautious very early on in the pandemic, but at the same time remained optimistic, investing in the District, local residents and businesses. He felt it an outstanding achievement that despite one of the worst years on record, the Council had still achieved a positive outturn.

Cllr T Laidlaw acknowledged that he had previously been critical of the Council's rate of spend on the capital programme, however he was very pleased with the current position, which he felt was an indication of the hard work of officers. He also drew attention to a minor error in the papers at paragraph 3.24, under "Transfers to General Reserves" and this was acknowleged by officers. The Director of Resources confirmed that this error did not impact on any other figures in the report.

The Strategy and Programmes Manager then provided members with an overview of the Council's performance against performance measures, explaining that 14 measures had met year end success criteria (demonstrated by a green indicator), 5 had missed the target by a narrow margin (amber), and 4 had missed the end of year target by a significant margin (red). Members noted examples in each of these areas.

Referring to risks, the Strategy and Programmes Manager explained that the register continued to be monitored by Management Team, and that there had been no changes to the strategic risks during the last quarter.

During discussion, Cllr A Thomas commented on the huge pressure that staff were under, in particular the Benefits, Housing and Council Tax teams, and she stressed the importance and value of such services.

The Chairman referred to the Council's overall performance as extraordinary, adding that despite the ongoing impacts of Covid, the Council had remained stable, helping those in need, whilst continuing with "business as usual" in most areas. He stressed that he was immensely proud of what the Council, members, and staff had achieved.

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 4 (detail in Appendix 3).
- 4. **RECOMMEND TO COUNCIL** the slippage requests for both Revenue (as detailed in paragraph 3.30) & Capital (as detailed in paragraph 3.32).
- 5. **RECOMMEND TO COUNCIL** the recreation of three new earmarked reserves;
 - a) Covid Recovery Reserve (see 3.4)
 - b) Leisure Services Recovery Reserve (see 3.11)
 - c) Waste Reserve (see 3.15).

The Reason for the Decision

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

Other Options Considered

None

2907 EMPTY HOMES POLICY

Members considered the report of the Policy and Partnerships Officer, which presented the draft Housing Standards Empty Homes Policy, for approval.

The Director of People and Communities presented the report to members, explaining that the Policy sought to incentivise property owners to bring empty homes back in to use, and to put the mechanisms in place to allow the Council to adopt a more regulatory route if required.

Members noted the Council's strong performance in minimising the number of empty homes, and also how complex and labour-intensive cases could be. The Portfolio holder, Cllr A Thomas explained that the Compulsory Purchase Order route would only be sought following Cabinet approval, and she stressed the need to work positively with homeowners before any regulatory route was sought.

Members welcomed the proposals and it was

RESOLVED:

To:

- 1. Approve adoption of the Empty Homes Policy.
- 2. Agree proposal that Cabinet provides approval to seek to undertake Empty Dwelling Management Order (EDMO) and Compulsory Purchase Order (CPOs) processes on a case by case basis.
- 3. Approve creation within the 2021/22 financial year of:
 - A reserve fund of £500,000 in order to undertake a voluntary offer of purchase as part of a Compulsory Purchase Order procedure
 - A Housing Standards formal enforcement budget of £50,000 per annum
 - A Housing Standards financial assistance offer budget of £30,000 per annum.

The Reason for the Decision

To support a more robust approach to empty homes and help bring them back in to use.

Other Options Considered

As outlined in the report.

2908 PROPOSALS FOR ADDITIONAL ENVIRONMENTAL ENFORCEMENT

Members considered the report of the Assistant Director Regulatory, which presented proposals for the delivery of additional environmental enforcement capacity.

The Assistant Director Regulatory presented his report and drew attention to the options outlined in paragraph 4. He explained that the proposals would assist in protecting the environment, provide community safety for residents, whilst delivering on the actions in the Environmental Strategy.

Members expressed support for Option 2, an Environmental Enforcement Officer, plus a Case Support Officer, and also welcomed the proposal to increases the hours of the current Water Management Officer position, to full time.

Cllr K Mason Billig stressed the importance of ensuring that the Council took a proactive approach and educated residents with regard to riparian rights and responsibilities and Cabinet agreed that it was important to learn the lessons from the recent flooding in the district.

RESOLVED:

To agree to

- (a) establish a permanent post of Environmental Enforcement Officer and to pilot Case Support Officer capacity as a short-term contract, described in Option 2.
- (b) establish an additional 17 hours per week to make the Water Management Officer post full-time as described in Option 3 at a cost of £11k per annum.

The Reason for the Decision

To ensure an increase in enforcement capacity and greater case support

Other Options Considered

As outlined in the report.

2909 HOUSING IN MULTIPLE OCCUPATION DISCRETIONARY ACTIVITY POLICY

Members considered the report of the Policy and Partnerships Officer, which presented Cabinet with the draft Housing Standards Houses in Multiple Occupation Discretionary Activity Policy, for approval.

The Director of People and Communities presented the report, explaining that the proposals sought to place more emphasis on the regulatory role, providing a more robust approach. Members noted that an additional 43 houses of multiple occupation had come to light since the start of the pandemic, and it was felt that this was due to the more proactive approach adopted over the last 12 months.

The Chairman welcomed the proposals and agreed that this was about more than enforcement, but also protecting the most vulnerable and was part of the wider holistic approach to the Covid outbreak management strategy

RESOLVED

To:

- 1. Approve adoption of the Houses in Multiple Occupation Discretionary Activity Policy.
- 2. Approve amending an existing vacancy from Band E to Band F enabling recruitment to 1fte Community Enforcement Officer post.

The Reason for the Decision

To demonstrate a more holistic and muscular approach to tackling housing issues, which feeds into the Council's wider strategic ambitions to ensure the quality of life for residents and support the vision of the Environmental Strategy.

Other Options Considered

Not to undertake discretionary action regarding Houses of Multiple Occupation

2910 REVIEW OF THE COUNCIL'S TEMPORARY STOPPING PLACE FOR GYPSIES AND TRAVELLERS

Members considered the report of the Assistant Director Individuals and Families, which outlined proposals to restart the Gypsy and Traveller Temporary Stopping Place (TSP) at Bawburgh, as part of the Council's overall policy, to support all members of the community, and ensure a robust but proportionate response to unauthorised encampments when needed.

The Director of People and Communities introduced the report, explaining that a TSP was a valuable and effective tool to support unauthorised encampments. However, the site at Bawburgh had unfortunately not been used in recent times for its intended purpose, and officers were therefore seeking to redesign the site, improve its security and provide more robust management.

The Chairman agreed that the site required fresh investment and stressed that robust management was necessary and needed regular review.

Local member for Bawburgh, Cllr D Bills, outlined the problems associated with the site, advising that Gypsies and Travellers had on numerous occasions set up camp on the Bawburgh Village Hall car park, leaving the

Parish Council to pay for the clear up after they had left. He stressed the importance of ensuring that any proposals were realistic and viable, in order to provide assurances to residents, that the site was a workable option.

Mr D Gooderham of Bawburgh Parish Council thanked officers for producing a factual and honest report regarding the problems associated with the site. He stressed that one of the biggest problems was the remote location of the site, and he was concerned that the budget might not be sufficient to provide the necessary security and management that was required. However, he explained that residents would be grateful of any improvements that could be made.

The Portfolio Holder, Cllr A Thomas agreed that more robust management and security was required and accepted that this might come with hidden costs. She stressed the need to work more closely with Bawburgh Parish Council, so that it could be more prepared for any potential issues in the village and possible encampments on the village hall car park.

The Chairman agreed that there was a responsibility to work with colleagues in the Police and to provide a commitment to support the Parish Council where possible.

Cllr K Mason Billig expressed her disappointment that other district councils had not wanted to contribute to the costs of the site, or provide a TSP in their own districts, and she stressed the need to ensure that other authorities did not take advantage of the Bawburgh site.

RESOLVED:

To delegate the redesign and management plan of the Temporary Stopping Place up to £125,000, to the Assistant Director of Individuals and Families, in consultation with the portfolio holder for Better Lives.

The Reason for the Decision

To support an effective tool for the Council to use on unauthorised encampments, whilst minimising the impact on the local community.

Other Options Considered

- To sell the site
- To lease to an individual family

(The meeting	concluded at 11.01am)
Chairman	



Agenda Item:5 Cabinet 19 July 2021

Greater Norwich Local Plan (GNLP) – Submission to the Secretary of State for Independent Examination

Report Author(s): Paul Harris

Place Shaping Manager

01603 430444

paul.harris@broadland.gov.uk

Portfolio: External Affairs and Policy / Stronger Economy

Ward(s) Affected: All

Purpose of the Report:

To agree to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination.

Recommendations:

Cabinet to recommend that Council:

- Agree that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination subject to reaching an agreement in principle with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations.
- Commit to proactively identify and bring forward sufficient Gypsy and Traveller site to meet identified needs in accordance with the criteria based policies of the current and emerging Development Plans.
- 3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;

and,

- 4. Delegate authority to the Assistant Director for Planning in consultation with the Portfolio Holders for External Affairs and Policy and Stronger Economy, and in conjunction with Broadland District and Norwich City Councils, to:
 - a. agree minor modifications to the GNLP prior to its submission.

and,

b. negotiate any main modifications necessary to make the GNLP Sound as part of the Independent Examination.

1. Summary

- On 11 January 2021 South Norfolk Council's Cabinet agreed to publish the presubmission version of the Greater Norwich Local Plan (GNLP) under Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012. The publication of the GNLP took place between 1 February and 22 March 2021.
- 1.2 The GNLP team have reviewed and assessed the representations submitted in response to the publication of the GNLP. With the exception of matters specifically addressed by the recommendations of this report, it is concluded that the representations received have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
- 1.3 On this basis, it is therefore proposed that Council agrees to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination, subject to the caveats and delegations specified in the recommendation.

2. Background

- 2.1 Broadland District Council, Norwich City Council and South Norfolk Council are working together with Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP). The GNLP builds on the long-established joint working arrangements for Greater Norwich, which delivered the Core Strategy (JCS). The JCS plans for the housing and jobs needs of the area to 2026. The GNLP will ensure that these needs continue to be met to 2038. The GNLP includes strategic planning policies and allocates individual sites for development.
- 2.2 When adopted the GNLP will become part of the Development Plan, and will replace the current Joint Core Strategy and South Norfolk's Site Specific Allocations and Policies DPD. The GNLP will not replace the Wymondham and Long Stratton Area Actions Plans and the South Norfolk Development Management Policies Document. The GNLP will be used in conjunction with the adopted Area Action Plan, the Development Management Plan and Neighbourhood Plans.

- 2.3 A joint team of officers from Broadland, Norwich, South Norfolk and Norfolk County Council has prepared the GNLP. The Greater Norwich Development Partnership Board (GNDP) exercises political leadership for the planning activities carried out jointly by the Greater Norwich Local Planning Authorities. The board is made up of three member from Broadland District Council, Norwich City Council and South Norfolk Council and a member from the Broads Authority. The group is supported in its role by Director level representation from each Local Authority.
- 2.4 On 11 January 2021 South Norfolk Council's Cabinet agreed to publish the presubmission version of the Greater Norwich Local Plan (GNLP) under Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012. The publication of the GNLP took place between 1 February and 22 March 2021.
- 2.5 The publication of the GNLP allowed stakeholders to make representations in respect of whether the GNLP was: 1) legally and procedurally compliant; 2) Sound¹; and 3) in compliance with the Duty to Cooperate. Regulation 19 representations are sent to the independent inspector to be considered as part of the independent examination.
- 2.6 A copy of the report of the GNLP Manager to the GNDP meeting of the 24th June 2021 is included as Appendix A. The GNDP report sets out the main issues raised in response to the publication of the GNLP. With the exception of matters set out below, for the reasons specified in the GNDP report it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
- 2.7 The exceptional matters relate to the agreement of the necessary mitigation under the Habitat Regulations and demonstrating that the plan will meet the accommodation needs of Gypsies and Travellers. The specific recommendations of this report seek to address these exceptional matters.

3. Current position/findings

- 3.1 The GNLP team have reviewed and assessed the representations submitted in response to the publication of the GNLP. Included, as Appendix A is the report of the GNLP Manager to the GNDP meeting of the 24th June 2021. This report sets out the main issues raised in response to the publication of the GNLP. For the reasons set out within the report, and with the exception of matters set out below, it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
- 3.2 The exceptional matters relate to the agreement of the necessary mitigation under the Habitat Regulations and demonstrating that the plan will meet the accommodation needs of Gypsies and Travellers. The specific recommendations of this report seek to address these exceptional matters.

¹ Soundness is defined in paragraph 35 of the NPPF and requires a Local Plan to be positively prepared, justified, effective and consistent with national policy

- 3.3 When completed the GNLP will become part of the Development Plan, and will replace the current Joint Core Strategy and Broadland Site Allocations DPD. In doing so it will ensure that the Strategic Policies remain up-to-date and that the housing and jobs needs of the area continue to be met to 2038.
- 3.4 In respect of managing development through the determination of planning applications, to the extent that the adopted development plan policies are material to an application for planning permission the decision to grant or refuse permission must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.
- 3.5 Whilst policies of the development plan do not become "out-of-date" simply through the passage of time, it is important that plans are kept up-to-date in order to ensure that the policies that they contain carry full weight in the determination of planning applications.
- 3.6 Moreover, in its Planning for the Future document published in March 2020, government also set out its intention to set a deadline of December 2023 for all local authorities to have an up-to-date local plan. Indicating that government will prepare to intervene where local authorities fail to do so.
- 3.7 It is therefore important that the Council make timely progress on the production of the GNLP.

4. Proposed action

4.1 It is proposed that Council agrees to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination and delegates authority to the Assistant Director for Planning in consultation with the Portfolio Holders for External Affairs and Policy and Stronger Economy to agree minor modifications to the GNLP prior to its submission.

5. Other options

- 5.1 Council may defer the submission of the GNLP to seek further clarifications prior to its submission, seek further amendments to the plan if it considers the plan is currently unsound or no longer represents an appropriate strategy or it may resolve not to submit the GNLP for independent examination.
- 5.2 Any of the above options would cause a delay to the progress of the plan. The length of such a delay would depend on the reasons for the decision taken.
- 5.3 Any amendment to the plan that is proposed would need to be agreed independently by each of the three Councils and, depending on their significance and extent, may require further consultation on the plan or for the pre-submission publication be repeated. Such a decision would therefore likely lead to significant delays to the plan.

6. Issues and risks

- 6.1 **Resource Implications** The GNLP is produced under an agreed budget with contributions from the three councils. Existing staff resources from each of the three authorities is also utilised to support the production of the plan. Delays in the progress of the plan are likely result in further costs being borne by each of the three authorities.
- 6.2 Legal Implications The matters of whether the plan is legally and procedurally compliant, and whether the Council's obligations under the Duty to Co-operate is a key test of the independent examination. The publication of the plan allowed for representation to be submitted in regard to the Plan's compliance with these tests. For the reasons set out in section 3, and with the exception of the outstanding matter related to compliance with the Habitat Regulations, it is not considered that any representations made give rise to concern that the plan has not met its legal obligations.

If adopted following a successful independent examination, an interested party has 6 weeks to apply for judicial review on the basis that the Plan, or its production, is unlawful. The pre-submission publication of the plan and its subsequent independent examination is proportionate mitigation for this risk.

In regards to the management of development, when adopted the GNLP will become part of the Development Plan for the area. In accordance with section 70(2) of the Town and County Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, to the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. Section 3 sets out the implications for decision making of maintaining an up-to-date Development Plan.

- 6.3 **Equality Implications** The GNLP has been subject to EqIA.
- 6.4 **Environmental Impact** The GNLP has been subject to Sustainability Appraisal (Incorporating Strategic Environmental Assessment) and Habitat Regulations Assessment. These
- 6.5 **Crime and Disorder** Policy 2 of the GNLP requires development proposals to "create inclusive, resilient and safe communities.
- 6.6 **Risks** The GNLP has been prepared under an accelerated timetable. As such it was not possible to carry out the Regulation 18D consultation that was agreed by the GNDP board on 10th July 2020 and subsequently agreed by councils' through updates to their Local Development Schemes (LDS).

A number of mitigations measures have been put in place through the acceleration programme to minimise the additional risk posed by removing this stage of consultation.

7. Conclusion

- 7.1 For the reasons set out in section three, it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
- 7.2 In addition, the timely progress of the GNLP is important in order to ensure that the Council's Development Plan remains effective and that the policies of the Development Plan continue to have full weight in the determination of planning application.

8. Recommendations

- 8.1 Cabinet to recommend that Council:
 - 1. Agree that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination subject to reaching an agreement in principle with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations.
 - 2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller site to meet identified needs in accordance with the criteria based policies of the current and emerging Development Plans.
 - 3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;

and,

- 4. Delegate authority to the Assistant Director for Planning in consultation with the Portfolio Holders for External Affairs and Policy and Stronger Economy, and in conjunction with Broadland and Norwich City Councils, to:
 - a. agree minor modifications to the GNLP prior to its submission.

and,

b. negotiate any main modifications necessary to make the GNLP Sound as part of the Independent Examination.

Background papers

Greater Norwich Local Plan, including changes required to the Policies map on adoption of the GNLP (shown in the settlement maps in the Sites plan) - Downloadable
Documents and Forms | GNLP

Sustainability Appraisal, Statement of Consultation and other supporting documents - Evidence Base | GNLP

Please note that the summary of representations made pursuant to regulation 20 i.e. duly made representations made in response to the pre-submission publication of the GNLP, are summarised in the GNDP report included as appendix A of this report.

Copies of all representations made under regulation 20 will be submitted to the Secretary of State.

Greater Norwich Development Partnership (GNDP)	
Report title	Submission of the Greater Norwich Local Plan (GNLP)
Date	24th June 2021

Recommendation

The Board recommends member councils to:

- 1. Agree that the Greater Norwich Local Plan is sound and to submit the plan to the Secretary of State for independent examination subject to an agreement in principle being reached with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations;
- 2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans.
- 3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;

and,

- 4. Delegate authority within the councils to:
 - a. agree minor modifications to the GNLP prior to its submission

and,

b. negotiate any main modifications necessary to make the GNLP sound as part of the Independent Examination.

Section 1 - The purpose of the report

- 1. The Regulation 19 stage of local plan-making, which for the GNLP took place in early 2021, provides the opportunity to make representations on the legal compliance and soundness of a draft plan. This enables:
 - a. Recommendations to be made to members about whether a plan can be submitted, or alternatively further consultation or a repeat of the Regulation 19 stage is required to enable significant changes to be made to the plan;
 - b. After submission, an Inspector to decide on whether the plan can proceed to examination and, if so, what issues that examination should cover.
- 2. This report sets out the main issues raised through the Regulation 19 stage of planmaking. It concludes that the representations have identified no significant issues, in principle, that cannot be addressed or are such a risk to the GNLP that it should not be submitted in the near future. The recommendation provides the caveat that submission of the plan is subject to progress being made on key issues relating to protected habitats and Gypsy and Traveller sites.
- 3. The recommendation also covers delegated authority at the three councils, which will need to be co-ordinated, for the sign-off of minor modifications covering issues such as corrections, updated information and clarification of supporting text stemming from representations prior to submission of the plan. Delegated authority is further recommended to negotiate main modifications during the examination, which are likely to be related to policy content. Both of these measures are the standard approach and are required for the examination to run effectively.
- 4. Subject to approval, the GNDP report will be considered by the councils in July to decide whether to submit the plan for examination on July 30th. If the plan is submitted at that date, examination is timetabled for November/December 2021 (subject to the Inspector) and adoption for September 2022.

Section 2 - Context

Challenges

5. The GNLP has addressed a number of challenges:

The changing context for plan-making - Since work began on the GNLP in 2016, through the three stages of consultation between 2018 and 2020, and most particularly over the last year, there has been a rapidly changing context for plan-making. In August 2020 the "Planning for the Future" white paper was published by government. It points towards a potentially radical overhaul of the planning system as a whole, including plan-making. Significantly for the GNLP, it highlighted the need for local plans to play their part in addressing the housing crisis nationally and locally. In the short term, government reiterated that the current round of plans in development such as the GNLP must be adopted by the end of 2023. In the longer term, it pointed to a quicker, more certain,

digitised planning system, with an enhanced role for local plans as the main means of public engagement on site selection and development.

Housing numbers for plans - Housing need is established locally using a national standard methodology. Changes proposed to the methodology prior to and as part of the government's August 2020 consultation have subsequently been amended and household projections and affordability data which form part of the methodology are regularly updated. Consequently, though housing need figures have changed somewhat and will change further over time, it is necessary to fix on an appropriate number to produce a plan. In addition, the need is a minimum for any plan, with local plan housing provision also having to take account of economic growth potential and of providing a buffer to ensure delivery of the housing required to address the housing crisis. The approach taken at the Regulation 18 stage of plan-making, which included a number of preferred options and alternative approaches for policies and sites, including consulting on the amount of growth and its proposed locations, has provided flexibility to make changes between plan-making stages.

Sustainable growth – the GNLP promotes the right types of growth in the right locations to facilitate post Covid-19 economic recovery, promote the post-carbon economy, address climate change impacts and support services in our communities. This has been done by maximising the potential of brownfield sites, supporting high technology employment growth, particularly in the Cambridge Norwich Tech Corridor, and providing for greenfield sites for housing growth on the edge of the urban area, towns and villages.

Protecting and enhancing habitats - to ensure growth does not have a negative impact on internationally protected habitats, work has been undertaken at the county level on addressing increased visitor pressure on those habitats. The plan also provides for the protection and enhancement of locally significant habitats and will follow on from the success of the JCS in providing improved green infrastructure.

Representations

- 6. No representations have been made that in the view of officers would require further Regulation 18 consultation or a repeat of the Regulation 19 stage. However, some representations have raised issues which must be addressed before submission, and possibly before and at the examination. In particular, work on protecting key habitats will need to be agreed with Natural England, at least in principle, to enable submission. This is set out in section 3 of this report.
- 7. Section 4 covers issues which are not considered to require further work prior to submission but seem likely to be dealt with at examination.
- 8. Overall, 1,316 representations were made on the plan (263 support and 1,053 objections). Appendix 1 provides information on the numbers of representations made in relation to different policies. Please note that this only gives a broad overview of

- where concerns and support lie. This is because, for example, considerable concerns about the choice of a housing site in Hingham has been expressed primarily through a co-ordinated representation submitted by the town council rather than through large numbers of separate representations.
- 9. Appendix 2 provides a concise summary of the main issues raised. It is broadly organised on a policy and thematic basis, though in some cases organisations are named for clarity. A more detailed summary of representations made by different individuals and organisations, which is part of the Statement of Consultation to accompany submission of the plan, and which includes officer responses to the representations, is available here. The full representations made, without officer responses, are available from the GNLP website here.

Section 3 - Issues being addressed ahead of submission and beyond

- 10. It is anticipated that a number of issues raised through representations will be addressed, in many cases prior to, but in some cases subsequent to, submission. These are issues on which agreement can be made, or common ground identified with some outstanding elements to be debated at examination.
- 11. These issues will be addressed through Statements of Common Ground with organisations leading to proposed minor modifications to be submitted with the plan, or simply by the authorities proposing minor modifications to accompany submission without the need for a statement.
- 12. Main modifications, such as major changes to policies, cannot be made at this stage of plan-making. If the authorities are of the view that such major changes are required, another Regulation 19 stage would have to take place, or even a return to the Regulation 18 consultation stage. However, such modifications can be consulted on at examination and then recommended by the Inspector's report of the examination to enable the plan to be adopted.
- 13. Table 1 below sets out ongoing and anticipated work of this type. Members will be updated on progress on this work at the GNDP meeting and subsequently at Cabinets and Full Councils:

Table 1

Issue	Ongoing/required work
Duty to	The D to C covers strategic scale cross-boundary issues between councils,
Cooperate (D to C)	infrastructure providers and organisations such as the Environment Agency, Historic England and Natural England. More local issues have been raised in some of the representations to the GNLP in relation to the D to C, which in most cases relate to concerns over the consultation process, which is different from the D to C.
	The most common D to C issue nationally which has created problems for local plans is meeting the excess housing needs of some, mainly urban, areas in neighbouring areas.
	For Greater Norwich, the Norfolk Strategic Planning Framework (NSPF) provides a series of agreements through its regularly updated Statement of Common Ground which addresses strategic D to C cross-boundary issues. However, in some cases a commitment to future joint work on more specific cross-boundary issues needs to be agreed, such as ongoing engagement with Breckland District Council on water, power and economic synergies which is being addressed through a specific Statement of Common Ground.
	In other cases, clarification on issues raised at Regulation 19 is required. This is the case with Natural England, with whom in principle agreement will be needed on addressing the issue of visitor impact on internationally protected habitats. This requires the signing of a Statement of Common Ground prior to submission of the plan. This follows from the GIRAMS work, undertaken under the NSPF, to identify avoidance and mitigation measures for potential recreational impacts, which is not yet approved. It is critical that this in principle agreement is reached through a Statement to enable the GNLP to be submitted, as compliance with the Habitats Regulations it relates to is a legal requirement. Lack of agreement with Natural England could also be judged to be a D to C failure which would prevent examination of the plan. There is a lot of work to do on this which risks the timing of submission on July 30 th . If this is not achievable, submission should be considered for September.
Gypsies and Travellers	No sites have been submitted through the plan-making process to address evidenced need. Failure to provide for the evidenced need through specific sites in addition to the criteria-based policy for assessing applications (in policy 4 on Homes) is potentially a risk to the plan being found sound. Consequently, we are proactively engaging with existing families/site owners to explore the potential for acceptable expansion of existing sites through the development management process and continuing to explore options to find suitable land in public ownership on which to bring forward a site.
Evidence updates	Work is also ongoing to supplement and update the evidence base (partly in response to representations) including: a. A request from Historic England for Heritage Assessments for a number of proposed sites (mainly in the city centre) and inclusion of other heritage evidence;

b. More detail on the timing of the delivery of sites in the housing trajectory; c. Supplementary viability information; d. Updated information on housing, including the types of homes required; e. Updating of the Habitat Regulations Assessment (HRA) to explain the situation and further justify its conclusions relating to the GIRAMS and the finalisation of the Water Cycle Study. Minor Minor modifications to the text (not the policies themselves) of the plan will be

modifications

submitted mainly to address representations from Historic England, Natural England, the Environment Agency and Anglian Water. These largely relate to the Vision and Objectives, policies 2 (Sustainable Communities), 3 (Environmental Enhancement) and 4 (Infrastructure), as well as a number of site allocations. Other proposed minor modifications will cover the limited number of errors identified.

<u>Section 4 – Potential issues for the examination</u>

- 14. The actual issues for the examination will be determined by the Inspector taking account of policy and legal requirements, his or her own judgement and the representations that have been made.
- 15. In the light of the representations made, national policy/guidance and experience of previous examinations, the three key issues for the plan's examination (if submitted) are most likely to be:
 - a. The overall housing numbers and the locations and deliverability of growth, including site viability and the impact on climate change;
 - b. Addressing Habitats Regulations visitor pressure issues through an agreed approach with Natural England;
 - c. Provision of a site/s to meet the needs of Gypsies and Travellers (though this has not been a focus of representations, expert advice is that this is an issue).
- 16. Taking account of the broad range of representations made, and subject to progressing the matters set out in the recommendation, officers recommend that the plan as drafted can be submitted. We are confident that well-reasoned arguments can be provided at examination to justify the approach taken in the plan in relation to the issues raised in representations.
- 17. Table 2 below provides officer summaries of the potential issues for the examination based on the representations that have been made, with officer responses in relation to these issues which will be worked up further as we head towards examination. A number of the representations highlight different interpretations of the National Planning Policy Framework and its supporting guidance.
- 18. As referenced in paragraph 9 above, Appendix 2 provides further detail of the representations, with full representations available <u>here</u>.

Table 2

A. Process Issues		Officer Response
Site Selection	 The process has been questioned at different levels of the hierarchy, including: the role of Sustainability Appraisal (SA) e.g. for sites on the edge of Hellesdon in Horsford parish, with a legal view submitted questioning site selection soundness; Aylsham (the inclusion of an additional site at the Regulation 19 stage – see below); Key Service Centres (particularly site selection in Hingham); Village Clusters (the site selection process involving school catchments has been questioned). 	In relation to representations on the process of plan-making, there is confidence that the approach we have taken is sound. This includes site selection, the use of SA, the Duty to Cooperate and the consultation process overall, including the increase in housing numbers and consequent inclusion of additional sites at the Regulation 19 stage (see below). The role of the SA in site selection and the wider process used in assessing sites have been clearly set out and recorded, with criteria which reflect national planning policy, county-wide and local priorities provided to guide that selection. The introductory section of the Sites Plan explains the process used and settlement booklets identify why the sites were selected in each settlement.
Dependent plans	The role and timing of the South Norfolk Village Clusters plan (including evidencing the amount of growth), along with the Diss and area Neighbourhood Plan's role in allocating sites has been questioned.	There is flexibility in how Local Plans are produced so that they can be either single or multiple volume documents. In addition, Neighbourhood Plans can allocate sites. The emerging village clusters plan in South Norfolk, now being consulted on, provides evidence that the growth required by the GNLP can be provided for in sustainable locations.
Changes from Regs 18 to 19 (lack of Reg 18D consultation)	 The lack of consultation on both the overall numbers and additional sites/increased numbers has been criticised (this has particularly been raised in relation to Acle, Aylsham, Horsham St. Faith and Lingwood); The inability to comment on and change settlement boundaries has been raised. 	The 2012 Planning Regulations anticipate that there will be changes in whatever has been consulted upon after the Regulation 18 consultation. It is very common for new sites to be proposed for allocation for the first time at the Regulation 19 stage either because they have only recently become available or the local planning authority needs to supplement its allocations in order better to meet needs. At the Regulation 18C draft plan stage of the GNLP, overall housing numbers were consulted on, alternative sites were

consulted on as well as those proposed for allocation, and new sites were submitted.

The system of plan preparation would be rendered very inflexible if such changes required a further regulation 18 consultation.

The decision to not include revisions to settlement boundaries in the plan resulted from the timetable changes stemming for the release of the "Planning for the Future" white paper. Amendments will be possible through any future review of development management policies.

B. Plan content

Overall housing growth

Representations from different organisations and individuals state opposite views that the plan provides for:

- Too little housing growth (it doesn't reflect economic aspirations and there is questioning of the methodology re. housing numbers);
- Too much growth (housing need + a 5% buffer is sufficient, insufficient account has been taken of climate change, with the South Oxfordshire plan referenced as a plan challenged on the scale of growth in relation to climate change).

Also -

- a) Windfall a greater or lesser focus should be placed on windfall in calculating housing numbers, and policy 7.5 is considered unworkable;
- b) Contingency more contingency sites are required versus none are needed.

The level of housing need for Greater Norwich is identified by using the government's standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.

The challenge to the South Oxfordshire plan concerning the scale of growth and its climate change impacts was unsuccessful. Meeting housing need was identified as a key consideration as well as addressing climate change as plans need to provide for economic, social and environmental sustainability.

The approach to windfall, which allows for some of the likely delivery to be included as part of overall housing provision, is considered appropriate. As windfall delivery is likely to remain robustly high, it is appropriate to include a limited

5-year land supply	Representations (from some in the development industry) question the proposed approach to the 5-year land supply which is based on the housing need identified through the standard methodology without including the buffer.	proportion as part of total potential delivery. One contingency site is included should this prove to be required due to low delivery of allocated housing sites. The overall approach, including to windfalls, contingency and having a significant buffer, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal if this were to occur. The figure of 49,492 is potential housing delivery during the plan period, not the housing need. The need is 40,541, calculated using the standard methodology. The latter is proposed to be used to calculate 5-year housing land supply.
The location of growth	i) Settlement hierarchy i) Suggested changes (all to include more growth in specific locations): (1) Wymondham should be a Large Main Town; (2) Mulbarton, Scole and Horsford should be Key Service Centres (KSCs); (3) A separate countryside category is needed. ii) The amount of growth in different parts of the hierarchy: (1) More vs. less in the urban area (sustainability + availability of sites from city centre decline vs. deliverability and market saturation issues), over reliance on Strategic Regeneration Areas with limited evidence (East Norwich and Northern City Centre) and the North East Growth Triangle.	1) The Settlement Hierarchy, which is based on evidence of the services available in different settlements, is considered to be appropriate. Open countryside is in the village clusters level of the hierarchy The overall growth strategy, including housing and jobs numbers and locations, is considered to be well-evidenced and to meet the plan's objectives. This will be achieved by focussing the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and addressing climate change impacts. At the same time, the strategy allows for some growth in and around smaller villages to support local services. Our strategy maximises the potential of brownfield land and accessible greenfield sites. The strategy also offers a range of types and locations of sites which will help to ensure that the broad range of housing needs of our communities are met, enhancing delivery of the housing by providing opportunities for a range of house providers.

- (2) More/less growth in towns (less in Aylsham, more in Wymondham and Diss, new sites needed in Long Stratton).
- (3) More/less growth in KSCs different views with focus on more in Brundall, Hethersett, Loddon, Poringland, Reepham and Wroxham vs. less in Reepham and a different site in Hingham;
- (4) More/less growth in village clusters.
- The lack of a Green Belt has been criticised;
- New Settlements there has been questioning of the lack of inclusion of new settlements, whilst an alternative view stated is that policy 7.6 should not prejudge the next plan;
- The Cambridge Norwich Tech Corridor (CNTC) should be a greater focus for growth;
- Undeliverable sites with no promoter or developer should not be in the plan.

- 2) Regulation 18 included consultation on the potential for a Green Belt. The strategic approach of protecting valued landscapes including strategic gaps provides the policy coverage required. Establishing a Green Belt for the future at this stage will reduce flexibility and place pressure for additional growth required in the future on those areas not included in any Green Belt.
- 3) The GNLP does not allocate any of the proposed new settlements as there are considered to be enough sites to meet needs in and around existing settlements. The strategy takes account of the Government's proposed changes to the planning system, with policy 7.6 setting out the intention to bring forward a new settlement or settlements through the next strategy and sets out a timetable for that work.
- 4) Forming part of the defined Strategic Growth Area, the CNTC is a major growth focus. Due to high levels of existing commitment in locations such as Wymondham, Hethersett, Cringleford and Easton which are already strategic locations for growth, only limited additional housing numbers have been added in these locations in this plan.
- Further evidence will be submitted showing that undeliverable sites have not been allocated in the plan.

Sites subject to significant/most representations

- East Norwich (the main concerns are over capacity and deliverability, including from Historic England);
- Anglia Square (the policy should be amended to reflect recent changed intentions concerning the site);
- The UEA Grounds Depot (the allocation should be deleted as the Yare Valley is a priority Green Infrastructure corridor);

Concerns over specific sites and locations for growth will be a key part of the examination and it will be for the Inspector to decide whether modifications are required to the policies we submit. As set out above, officers are confident that the site selection and plan-making process raised in relation to some locations has been sound.

	 Aylsham (the main concerns are over the process of adding a further site at the Regulation 19 stage and over infrastructure capacity); Hingham (the main concern is over site selection); The Showground (the main concern is over transport capacity); Lingwood (the main concern is over the site selection process adding a new site at the Regulation 19 stage); Foulsham (the main concern is over an historic hedgerow); Colney (the main concern is over the non-selection of a site). 	
Transport	The Norwich Western Link (NWL) should not be in plan, there is insufficient focus on walking, cycling and other sustainable transport and too much focus on aviation.	Although it is not a specific plan proposal, the inclusion of the NWL road reflects its progress by Norfolk County Council as an infrastructure priority, with a Preferred Route announcement made in July 2019. This applies to other improvements to transport including to the airport, rail services, trunk and primary roads and measures to promote active and sustainable transport which are also included in the GNLP.
Climate change	There is insufficient coverage of climate change issues which should be the basis of the plan. This includes the amount, distribution and timing of growth, inadequate targets and monitoring, an inadequate approach to energy and water efficiency and flood risk.	The climate change statement in the GNLP strategy sets out and justifies the broad ranging approach the plan takes to tacking climate change. As set out above, the strategy focusses the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and helping to address climate change impacts. It also allows for some growth in and around smaller villages to support local services, the loss of which would generate the need for more journeys. The overall housing numbers in the plan are
		suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19

		recovery and the move to a post-carbon economy.
		The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that national targets regularly change so it is appropriate that GN should contribute to those national targets. Thus, targets will be updated locally when they change nationally, as with changes made by the government this year.
		The GNLP contains policies which cover all relevant aspects of the emerging NSPF proposals for how local plans in the county should address climate change. Minor modifications to the GNLP's Delivery and Climate Change Statement and relevant text supporting policies will be submitted to provide updates on how this emerging policy advice (in agreement 19 of draft NSPF) is addressed. This is mainly achieved through the design of development required by Sustainable Communities Policy 2. The policy covers a broad range of issues related to climate change including access to services and facilities, active travel, electric vehicles, energy and water efficiency, flood risk, sustainable drainage,
Infrastructure	Provision is insufficient to support growth	overheating and green infrastructure. Appendix 1 setting out the infrastructure
	(especially for health and schools).	required to serve growth is based on evidence collected in the GNLP Infrastructure Needs Report. This has been produced by working with the relevant infrastructure providers, including Norfolk County Council for schools and health care providers for health facilities, so are the best available information which provides a planned approach to meeting growth needs. Updates will be made on an ongoing basis if and when circumstances change.
Housing	Affordable housing (AH) – the policy would over-deliver against need, there should be no AH requirement on student developments;	The homes policy is well evidenced. The affordable housing targets are based on evidence of need and have taken account of viability. Affordable housing is required on student accommodation

- The Accessible homes and space standard requirements are not evidenced;
- Elderly needs should be covered by more allocations, not just general policy support;
- 4) Self /Custom build shouldn't be a fixed percentage.
- away from UEA. This is required as without doing so, the delivery of sites for student accommodation would reduce the ability to address affordable housing needs.
- The standards set for accessible and adaptable homes are also based on evidence of need and have taken account of viability
- 3) Allocations have been made for and including housing for older people and policy 5 allows for such accommodation to be provided on any housing site.
- 4) Promotion of self/custom build is a government priority. The requirement for at least 5% of plots on sites of 40 dwellings plus will support their delivery. It will not be applied if lack of need can be evidenced.

Evidence

Questioning of:

- a) The validity of the Viability study;
- b) The Habitat Regulations
 Assessment (HRA) (and Water Cycle Study);
- c) The Statement of Consultation and lack of compliance with the South Norfolk Statement of Community Involvement;
- d) Sustainability Appraisal (SA)
- Non assessment of reasonable and strategic alternatives;
- II. Flawed assessment of specific sites;
- III. Supports a different strategy (there should only be limited new development in the KSCs and villages);
- IV. Inclusion of a contingency site is not justified;
- V. Carried forward sites have not been treated comparably with others;
- 5) Inadequate on carbon assessment and addressing climate change.

All evidence, including the Viability Study, HRA and SA has been produced by appropriate and experienced professional consultancies using the approaches required by government. As such, the evidence is considered to be robust. Discussions on the evidence base and how it has assisted in forming policy will be an important part of the examination.

The process of plan-making, which has included three stages of Regulation 18 consultation, is considered to have complied with requirements.

The Examination

- 19. The Inspector may, having considered differing views at examination, recommend that main modifications are required for the plan to be found sound. The authorities would have to consult on these and bring them back to the Inspector. If this does prove to be the case, members can only adopt the plan with these main modifications included. Main modifications could relate to any substantive aspect of the plan.
- 20. If the Inspector takes the view that there is a more serious cause for concern in relation to a major aspect of the strategy, such as the amount or the broad distribution of growth, he or she may write to the planning authorities before the hearings asking why the particular approach was adopted. Then, following initial hearings, if the Inspector concludes that an aspect of strategy is unsound, he or she may adjourn the hearings and issue an Interim Report, setting out what is considered necessary to overcome the concerns. During the adjournment, quick decision making would be required from the authorities to decide how best to proceed and bring proposals back to the Inspector.

<u>Section 5 – Conclusion</u>

- 21. To reiterate, the representations have identified no significant issues that cannot be addressed or are such a risk to the GNLP that it should not be submitted in the near future.
- 22. However, the timing of the submission of the plan will be key. This is particularly the case in relation to agreeing the principles of how the Habitats Regulations will be addressed with Natural England. Without this there are significant questions over the legal compliance of the plan and so its submission should be delayed. If the issues set out in the recommendation can be overcome in a short period of time, officers recommend that the plan should be submitted on July 30th. If not, delays until at least September this year will result. If submission were to be delayed to September, the plan should still be able to be adopted within the government's deadline of the end of 2023. The GNDP and then Cabinets and Full Councils will be informed of progress on these key issues to assist their consideration of submission of the plan.

Appendix 1

Representation numbers

This appendix gives a broad overview of those parts of the plan on which the most representations were made. Overall, 1,316 representations were made on the plan (263 support and 1,053 objections). As set out in paragraph 8 of the report, this is only an indication of how wide concerns or support is on issues as co-ordinated representations have been made by some groups and organisations.

Strategy

Section/policy with the most representations:

- 1. Policy 1 The Sustainable Growth Strategy (86 reps)
- 2. Section 2 Greater Norwich Profile (79 reps)
- 3. Section 3 The Vision and Objectives (65 reps)
- 4. Policy 5 Homes (57 reps)
- 5. Policy 3 Environmental Protection and Enhancement (48 reps)

Section/policy with the most support comments:

- 1. Section 2 Greater Norwich Profile (25 supports)
- 2. Policy 7.1 The Norwich Urban Area (14 supports)
- 3. Section 3 The Vision and Objectives (12 supports)
- 4. Policy 2 Sustainable Communities (12 supports)
- 5. Policy 3 Environmental Protection and Enhancement (10 supports)

Section/policy with the most object comments:

- 1. Policy 1 The Sustainable Growth Strategy (78 objects)
- 2. Section 2 Greater Norwich Profile (54 objects)
- 3. Section 3 The Vision and Objectives (53 objects)
- 4. Policy 5 Homes (51 objects)
- 5. Policy 3 Environmental Protection and Enhancement (38 objects)

Sites

Sites with the most representations

- 1. General Aylsham text and settlement map (68 reps)
- 2. Policy 0596R Aylsham (55 reps)
- 3. General Foulsham text and settlement map (30 reps)
- 4. East Norwich Strategic Allocation (21 reps)
- 5. Policy 0605 Foulsham (18 reps)

Sites with the most support comments:

- 1. East Norwich Strategic Allocation (5 supports)
- 2. General Taverham text and settlement map (5 supports)
- 3. General Poringland text and settlement map (5 supports)
- 4. Policy 0401 Norwich (4 supports)
- 5. Policy CC4 a and b Norwich (4 supports)

Sites with the most object comments:

- 1. General Aylsham text and settlement map (67 objects)
- 2. Policy 0596R Aylsham (54 objects)
- 3. General Foulsham text and settlement map (30 objects)
- 4. Policy 0605 Foulsham (17 objects)
- 5. East Norwich Strategic Allocation (16 objects)

Appendix 2

Summary of Main Issues raised

1. The Strategy

Foreword and Introduction

Topic	Main Issues raised
Engagement	Breckland DC wants to engage on proposals for new settlements and the South
with	Norfolk villages, particularly to understand how development will impact on power
Breckland	and water infrastructure and to investigate the potential for economic synergies in
	the Cambridge Norwich Tech Corridor (CNTC). A range of comments covering these
	issues have been made in relation to a number of elements of the text and policies of
	the plan. Officers from the GNLP team and Breckland are working together to address
	consequent concerns raised over the D to C through a Statement of Common Ground
	(SoCG) on further future co-operative work.
The amount of	The housing number is unnecessarily high. There is no need to increase the number of
housing	houses to be built way beyond the number required by the standard methodology.
growth	
Location of	1. Questioning of the North Rackheath allocation concerning the continued interest
growth	of developers; and, the viability of providing policy compliant levels of affordable housing
	2. The Cambridge Norwich Tech Corridor links universities in Cambridge and Norwich
	with research institutes and science parks, so it is questioned how the large
	number of homes planned for the North East Growth Triangle links to the
	employment in the Tech Corridor.
	3. Concentrating large developments on the edge of Norwich counteracts
	endeavours to secure an appropriate level of housing in rural villages.
	4. Mixed messages have been given over Wymondham - removing the 1,000-home
	contingency is unjustified. Furthermore, that the GNLP over relies on windfall
	sites, and that the South Norfolk Village Clusters Housing Site Allocations Local
	Plan cannot be relied upon.
	A lack of consideration has been given to proposals in North Norfolk. Recent
	announcements regarding a development of 300+ houses at nearby Badersfield will
	have an impact on Aylsham, as the majority of children from Badersfield attend
	Aylsham High School.
Process	1. Historic England has concerns about development management policies not being
	reviewed concurrently with the GNLP, and particularly the lack of a strategic policy
	framework for taller buildings and the skyline, the detailed approach to
	designated and non-designated heritage assets and heritage at risk.
	2. The GNLP should have regard to the East Marine Plans, paying attention to the
	policies and guidance published by the Marine Management Organisation, as well
	as fulfil Duty to Cooperate obligations.
	3. Criticism of the approach taken to Aylsham, especially the lack of public
	consultation amidst the pandemic about the addition of a second site and
	increasing the total housing requirement to 550 homes.

4. Not holding the Reg. 18D consultation means there has been no opportunity to comment on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18C consultation, nor to comment on any amendments to policies made since publication of the Reg. 18C consultation documentation. 5. To address climate change, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum. Legal challenges such as that being pursued in South Oxfordshire make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council's Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes. 6. The GNLP and the South Norfolk Village Clusters Housing Allocations (SNVHCA) should follow the same, or at least a very similar, timetable. 7. The Reg. 19 GNLP Climate Change Statement states that 'growth in villages is located where there is good access to services to support their retention'. It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP. 8. The decision not to pursue a Green Belt was taken without a full assessment of the evidence, raising questions about both the legal compliance and soundness of the Plan. To address this, CPRE Norfolk suggests a Green Belt on the 'green wedges' model. This evidence is presented in a paper by CPRE Norfolk: 'A Green Belt for Norwich?' 9. There should be closer collaboration in respect of Wroxham/Hoveton. More mention should be made of the numerous neighbourhood plans undertaken at great cost and by a lot of hard work by volunteers. There should also be some acknowledgement of the joint strategic collaboration between Broadland and South Norfolk councils and their joint management teams. Sustainability Clarity is needed on the overall sustainability and environmental impact of the plan in its entirety, including the cumulative sustainability appraisal testing of **Environmental** other plans accompanying the Reg. 19 GNLP. The suggestion is a matrix/progress table for existing policies and allocations – from other existing and proposed DPDs **Impact** and AAPs, as well as other commitments not already included in policy; 2. The GNLP should list the environmental assets of the area against the System of Environmental-Economic Accounting (SEEA). **GNLP** legibility Acknowledgement is sought that the lessons from the Joint Core Strategy concerning plan legibility have been learnt. **Future** 1. There is a need for further analysis about how the Covid-19 pandemic has and is proofing changing peoples' behaviours, and how the GNLP should be future-proofed against these changes. There should a statement in the introduction on how the plan is going to be continually reviewed, and reference made to the Tomorrow's Norfolk, Today's Challenge strategy. 2. The "Planning for the Future" White Paper will quickly supersede the GNLP - it would be helpful to see each council's representations to the Government's proposed changes to the planning system.

Norwich	The NWL, and for some other large-scale road building promoted in the plan, is
Western Link	incompatible with the climate change statement and various other plan statements,
(NWL)	ignores the fact that road construction induces demand and is environmentally
	destructive.

Greater Norwich Profile

Topic	Main Issues raised
Norwich	As above.
Western Link	
(NWL)	
Other transport	The GNLP should not commit to expanding the highly polluting and
issues	unsustainable aviation industry in policy 4;
	Sustainable transport should be part of decision making, be included in the plan
	and form part of the assessment for development sites;
	Respondents dispute the claim that the cycle network is good;
	Compulsory installation of electric vehicle charging points is required in houses;
	There should be a greater focus on hydrogen-based energy and transport
	solutions;
	Tension exists between carbon emissions being above the national average in
	rural parts of the area (partly due to a greater reliance on car journeys), the
	target to reduce carbon emissions, the lack of frequent low-carbon public
	transport, and the excessive numbers of housing planned.
Housing	CPRE Norfolk view that:
numbers and	o non-inclusion of a Green Belt (suggested on the 'green wedges' model) is
Green Belt	unsound.
	 housing numbers are too high and should be based on the standard
	methodology + a 5% buffer (this view is shared by individuals, who also state
	that Brexit and Covid-19 will reduce housing need).
	Population projections may change and economic forecasts are too optimistic.
	By putting forward a higher number of homes to be built, the increase in supply
	will increase the demand.
	Objection to traditional planning approach analysing past trends, projecting
	them into the future and converting the figures into land requirements.
	The 2018 household projections do not actually go far enough. There is no 'slack'
	in the plan for unexpected growth, or growth in the most sustainable locations.
Location of	The proportion of greenfield development (78%) is too high especially as office/
growth	retail space in the city centre will be available for redevelopment.
Engagement	As above.
with Breckland	
DC	
Infrastructure	The plan needs to refer to the Health and Wellbeing section to the Norfolk Joint
Needs	Strategic Needs Assessment (JSNA) which is the standard tool when predicting
	future health needs and trends in order to inform on housing and other factors.

Views from groups and about specific locations **Norwich Green** The Norwich Area Transportation Strategy has been successful in reducing vehicles entering the city centre and increasing the numbers of journeys on foot and by bike, **Party** but is a very long way from delivering an upgraded bus infrastructure plan (in the JCS). Suggest that: text and policies should place a greater focus on sustainable transport; county council seeking much larger road schemes than is necessary for addressing localised problems or for serving new development. The following changes are needed /considerations should be taken account of: An overall carbon budget for Greater Norwich to 2050 consistent with the Climate Change Act 2008 is needed, supported by a strategy and policies in line with the carbon budget trajectory. The Tyndall Centre shows Norwich must cut its carbon emissions by 13% every year to meet its contribution to Net Zero, Broadland and South Norfolk must make cuts of 13% and 14.25% respectively. Carbon emission contribution to sea level rise is a concern. A lower housing number (42,568 dwellings plus a 5% buffer) is needed resulting in lower development pressures on greenfield sites; Growth should be concentrated in high density low car developments close to sustainable transport hubs, with a higher concentration around Norwich; No dispersal of development to small villages which lack services; No new garden city settlements in open countryside distant from railheads; Protection of Green Wedges around Norwich; Development should be built to zero carbon standards that include renewable heating based on renewable energy generation; Retrofitting of historic development needed; A transport strategy is needed based on traffic reduction and a high degree of modal shift to bus, walking and cycling; Norwich Western Link should be abandoned and there should be no further major increases in road capacity; High nitrogen dioxide levels should be addressed, notably at Castle Meadow. **Natural England** The natural environment section is incomplete, with more focus needed on biodiversity loss, climate change, habitat fragmentation, pollution etc and how the proposed plan may impact on and address these issues. The plan also needs to recognise that recreational disturbance impacts affect not just internationally designated sites, but also locally protected sites. **RSPB** The plan needs to cover other land use categories where soil is an important resource e.g. peat soils provide for carbon capture + habitats. The There is no information about the Water Framework Directive (WFD) and risk to **Environment** water quality. No links are made to risk from development, or that preventing deterioration is a requirement. Agency **Stop Norwich** Questions how London in 90 and plan for a rail halt at Rackheath are addressed; Urbanisation The expense of exemplar eco-homes in Rackheath questions how planners can (SNUB) insist on deliverable carbon neutral housing; More references to sustainable drainage systems are needed.

Location The plan should acknowledge that development at Rackheath will affect the specific village of Salhouse due to shared facilities; representations Coltishall PC has concerns about the village suffering further from traffic growth due the NWL road and dispersed housing development; A development promoter supports the Strategic Housing Market Assessment. requirement of 3,900 additional communal establishment places for over 75s. A non-allocated care village at Barnham Broom has potential to help to meet the need; Concern from Bunwell PC about how large-scale developments, such as at Long Stratton, affects villages e.g. high school capacity; Concerns over primary and secondary school capacity and funding due to the delay in the Rackheath North development; Aylsham needs a new primary school now and cannot wait until new development is partially or fully completed; Colney Hall should be removed from the plan as it is outside settlement boundaries; BAW 2, Bawburgh and Colney Lakes is allocated for a water-based country park but the 2009 Colney Parish Plan suggested a much less intrusive approach. The BAW 2 land should be part of a Norwich Greenbelt involving the Yare Valley.

Vision and Objectives (V + O)

Topic	Main Issues raised
Support	
Community Facilities and Green Infrastructure	 Sport England support the development of sustainable communities with good access to green infrastructure, sports facilities, and better opportunities to enjoy healthy and active lifestyles. Rackheath PC state that any new community facilities should be offered within the remit of the Parish Council. Norfolk Biodiversity Partnership support access to greenspace as a key part of what makes a community healthy and attractive.
Water Quality	The Environment Agency supports the V + O but would like to see additional wording on water quality.
Objections	
Scale of growth	The scale of growth is incompatible with achieving the V + O.
Location of Growth	 Reps. from the development industry: A new settlement or garden village would better achieve net zero carbon emission development better that 'edge of settlement piecemeal growth'. The Vision should be strengthened on the importance of the economy in the countryside. Other reps. have stated that windfall conceals the scale of development proposed in villages in South Norfolk.

Growth in Main Concern expressed by individuals and the Town Council that additional growth in **Towns and KSCs** Aylsham included in the Regulation 19 draft plan: o Is not compatible with the objectives that people should have access to (particularly Aylsham) facilities and protecting and enhancing the distinctive characteristics of towns; Will make the scale of growth in Aylsham so great (at 15%) that it will not be possible to integrate existing and new communities; Has not been consulted on and/or gone through the full democratic/planmaking process; • Will not be supported by adequate infrastructure, with concern over the need for timely provision of a primary school and transport issues; Extra housing would have to meet carbon neutral standards to ensure greater efficiency in water and energy usage to achieve the V + O. Concern also expressed over the scale of growth in main towns and KSCs overall, in particular in Reepham. Reps. on the NWL from the "Stop the Western Link" campaign (SWL), which **Norwich Western Link** comprises ecologists, scientists, lawyers, academics and environmentalists: (NWL) o argue that the NWL should be suspended; o strongly object to the inclusion of the NWL within the GNLP, stating the plan purports to exclude the NWL when it is manifestly obvious the intention is to include it. SWL finds this pretence to be wholly objectionable. A number of individuals and the CPRE are also oppose the NWL on environmental grounds (destruction of valuable habitats and damage to chalk streams), stating it is in conflict with the green agenda that is expressed later in the strategy, including reducing private car journeys and emissions. Historic/Natural 1. Representations from Historic England and Natural England propose changes to **Environment** text on the environment. Historic England have also requested protecting and Landscapes landscapes to be in the V + O. 2. RSPB request clarification on how and by whom the environment will be maintained and enhanced, pointing to the role of landowners. **Quality and** CPRE contends that it is impossible to ensure that homes will be built at appropriate density of densities in relation to local character given the independence of the plan for the South Norfolk villages, including concerns over the "minimum" 1,200 figure in the homes South Norfolk clusters as this has not been consulted on and figures could be much higher. Carbon The Centre for Sustainable Energy recommends taking an approach similar to monitoring and Manchester based on analysis carried out by the Tyndall Centre which considers targets baseline emissions and sets a carbon budget. It also suggests that the economy objective should be more explicit about carbon emission reductions and that the infrastructure objective is strengthened to reflect the scale of infrastructure provision required to deliver zero carbon. Other representations have pointed to: the need for a comprehensive baseline, targets and monitoring of the plan based on reductions from 1990 carbon emission figures; the need to reduce transport emissions in rural areas which should be key to the growth strategy by reducing growth in rural areas.

Working with	Breckland DC comments as above.
Breckland	

Delivery and Climate Change Statements

Topic	Main Issues raised	
	Delivery Statement	
Legal process	Reps. from members of the public in relation to Reepham and Aylsham questioned the legality of the plan-making process in relation to consultation (particularly in relation to additional housing numbers and sites at the Regulation 19 stage), including failure to engage with those parish/town councils through the Duty to Cooperate or to take note of local views expressed through consultations.	
Working with	The GNLP committing to working with the private sector to overcome constraints to	
the private sector	planning is an insult to all who live and work in communities, including all town and parish councils.	
Location of growth	 Development should be concentrated within the Norwich urban area; The plan should allow for more employment development within the countryside where a rural location can be justified. 	
Infrastructure	Reference should be made to Norfolk Constabulary's potential infrastructure needs.	
Climate Change	Statement	
	The Environment Agency supports the climate change statement.	
Growth in	Additional growth in Aylsham with two sites on the edge of the settlement is not	
Aylsham	compatible with reducing carbon emissions.	
Norwich	The NWL is incompatible with the climate change statement by leading to increased	
Western Link	usage of the private car and increase carbon emissions, as well as damaging the	
road (NWL)	Wensum Valley.	
The scale of	Unacceptable climate change and environmental impact of the amount of overall	
growth and its environmental	growth with concerns over: resource use, including insufficient standards for energy efficiency (Norfolk	
impact	Wildlife Trust stated this is the case compared to other authorities) and water efficiency;	
	 the level of population growth, inward migration and continued development, which could better be met elsewhere in the country, being inappropriate for Greater Norwich; biodiversity (including the need to further promote net gain and green 	
	 infrastructure in rural and urban areas), reducing overheating, ecosystem protection and the loss of greenfield land; limited local service provision in new developments; over reliance on the car and lack of provision for infrastructure for electric cars; 	
The least's	improvements required to rural public transport. The leasting of growth should address disease above as This should result in	
The location	1. The location of growth should address climate change. This should result in	
of growth	inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in rural locations;	
	2. The amount of growth in KSCs and the Main Towns is too high.	
	2. The amount of growth in Noes and the Main Towns is too night.	

	The statement and the strategy should be flexible over certain developments which
	require rural locations and can incorporate sustainability in their design.
Carbon	1. There's a lack of an effective baseline and carbon reduction targets required for
monitoring	the GNLP to demonstrate how it will meet its legal obligations, with carbon
and targets	reduction required at the core of all policies;
_	2. The GNLP approach to carbon reduction is not urgent enough.
Historic	Historic England point to the need to reference climate change and the historic
environment	environment.

Policy 1 The Growth Strategy

Whilst a number of representations, mainly from the development industry, support policy 1's overall growth strategy, the great majority of representations as set out in the table were objections:

Topic	Main Issues raised	
Main issues ra	Main issues raised of direct relevance to policy 1	
Procedural	Duty to Cooperate (D to C)	
Issues	1. The GNLP departs from some of the agreements (nos. in brackets) in the NSPF	
	so the D to C has not been met, including:	
	a. The planned job growth is not matched by the housing requirement(3);	
	 The economic needs forecasts use Experian rather EEFM as per the NSPF; 	
	 c. The housing requirement is not high enough to address the City Deal (13); 	
	d. There are insufficient homes for the elderly and students (14).	
	2. Breckland DC are concerned (particularly over transport issues and energy and water supplies) that there has been insufficient cooperation over the growth in the Strategic Growth Area and South Norfolk villages.	
	3. A number of respondents (town/parish councils and individuals) have stated that failure to consult sufficiently is a failure on the D to C.	
	Consultation	
	 The change in housing numbers between Regs. 18 and 19 and the inclusion of an additional site in Aylsham requires additional Reg.18 consultation; Policies have not followed from the majority consultee response at Reg 18A (on windfall). 	
	Dependent Plans	
	 Can't rely on Diss and South Norfolk Village Clusters sites which will not be tested through the GNLP; 	
	 To address the policy vacuum, DM policies for residential applications in the South Norfolk Village Clusters needed. 	
	New settlements references and policy should be deleted or amended to identify that <i>opportunities will be explored</i> (alongside other options for growth), rather than prejudging a future plan.	

Evidence

- 1. A new Housing/Economic Needs Assessment should be completed before submission.
- 2. There is no evidence from SoCGs on the anticipated levels of delivery and/or viability of the current or uplifted site allocations. Concerns:
 - that the levels of housing proposed will not be delivered on sites already allocated for over five years;
 - over a lack of evidence on the uplift in the density on some existing allocations being achievable.
- 3. Up-to-date evidence base on open space and play is required.

The amount of growth

Climate Change and Growth

- 1. The plan prioritises economic growth and development over legal requirements on climate change, leading to carbon leakage.
- 2. A large buffer makes it almost certain that climate change targets will not be met. South Oxon's Local Plan makes it clear that plans can be challenged on climate change grounds.
- 3. Housing numbers should not be above housing need to minimise:
 - embedded carbon emissions in construction;
 - emissions from energy and transport emissions.
- 4. The plan has deferred including climate change policies that will deliver the lowest carbon homes despite the recent NSPF (Ag. 19).

Overly dispersed growth is not the best strategy re. climate change.

Housing need is higher than in the plan because:

- The standard method has been miscalculated and is a starting point, with the government's aim to significantly increase housing supply;
- Full account isn't taken of the needs of students and older people;
- There's a shortfall of 3,704 homes from the City Deal;
- The SHMA provides support for a higher local housing need, including affordable housing, than the standard method.

Clarity on the methodology used to calculate housing need, along with details of the timing of delivery of allocated sites in the trajectory, should be provided on submission.

The housing requirement

- The GNLP is ambiguous and there is no housing requirement set out in strategic policies. A number of reps. (from the development industry) criticise the requirement/target for being too low:
 - Based on the higher housing need and the existing JCS trajectory overestimates, the housing requirement should be 53,207 homes, which includes a buffer of around 24% (18,847 homes 2020-26 and 29,120 from 2026-38);
 - A higher requirement will aid post Covid-19 recovery;
 - Others state the buffer should be around 20% but should not include any windfall.

- 2. A number of reps. (CPRE, green groups, individuals) state the requirement is **too high**, most stating that it should be 42,568 (the housing need of 40,541+5% buffer), to
 - reduce environmental harm and climate change impacts;
 - reflect recent demographic changes;
 - protect the countryside and retain the character of Norfolk;
 - reflect issues over water supply and quality;
 - focus growth elsewhere in country where there are more regeneration needs and brownfield opportunities and better infrastructure, reducing the need for internal migration;
 - prioritise delivery of existing JCS allocations;
 - allow for flexibility in a time of uncertainty the housing figures need to be reviewed against Covid-19 and Brexit impacts.
- 3. Many added there should be more use of windfalls in the numbers.
- 4. The Government's continuance of the existing methodology confirms the housing need as 40,541 so there is no need to add 5,000 homes (no need to take account of 2018 projections or the direction of travel in Planning for the Future).
- 5. CPRE and others variously argue that:
 - housing need can be met through completions (2018 20), windfall and brownfield sites, so new greenfield allocations and policy 7.5 are not needed;
 - there should be phasing of delivery for any homes above housing need included following revisions to the standard methodology;
 - newly allocated sites should be phased to deliver after commitment;
 - there is no need for a contingency site.

5-year land supply

- 1. The 5-year land supply should not be assessed against housing need, but rather against the total housing figure in the plan.
- 2. The high housing targets in the JCS have led to developers winning appeals on unallocated greenfield sites on 5-year supply grounds so should not be repeated.

Employment land

- 1. Over-delivery of employment land as per allocations will lead to either a higher housing requirement or more in-commuting. If monitoring indicates either, review of the GNLP will be needed.
- 2. Reassessment of undeveloped allocated employment sites should lead to undeliverable sites being replaced by alternative allocations, including rural brownfield sites.

Location of growth

Settlement Hierarchy

- 1. Clarity is needed on the purpose of the hierarchy and how it has been used to inform the distribution of growth.
- 2. Various respondents have stated that the hierarchy should be changed as, due to their level of services/existing populations:

- Wymondham should have its own separate classification as a "Large main town" (with more growth);
- Mulbarton, Scole and Horsford should be Key Service Centres (KSCs) (with more growth).
- Village clusters are based on a questionable approach using school catchments (and numbers should be reduced as the strategy has too great an element of dispersal);
- The countryside should be identified in the settlement hierarchy enabling the growth of the rural economy.

Other comments

Various other reps. (mainly from the development industry) have stated:

- In line with the existing strategic approach in the JCS, more growth should be focussed in and around the urban area;
- Disproportionate levels of delivery proposed in the Norwich urban area will be challenging to deliver and allocations should be distributed more evenly across the hierarchy to ensure diversity, choice, competition and delivery;
- 3. More growth should be in Main Towns (Wymondham, Aylsham and Long Stratton are specifically identified) and KSCs to support rural economies and ensure delivery. These are even more integral to sustainability due to the current pandemic (home-working, reliance on local services, access to open space);
- **4.** Housing numbers in village clusters should be reduced;
- 5. New settlements are needed in this plan to create sustainable, beautiful places with clean growth, including promoting strategic growth area/tech corridor.

Undeliverable existing/additional allocated homes, particularly on strategic sites, should be redistributed to the most sustainable and deliverable locations (e.g. Wymondham).

Reps. from CPRE, parish and town councils, individuals and environmental/political groups, stated:

- More homes should be concentrated in Norwich using brownfield sites and by converting redundant retail and office space;
- The village cluster housing numbers are too high due to lack of service provision and increased traffic generation leading to increased carbon emissions, with electric cars doing little to limit impacts. No further allocations beyond those from the JCS should be made in villages, with windfall policy 7.5 removed in favour of prioritising rural exemption sites for affordable housing;
- A Green Belt on the Green Wedges model should be included to protect against urban sprawl;
- ONS (2018) project that 95% of household increase in the plan period will be 1 or 2 person households so suburban housing estates are the wrong solution.

Aylsham - Reps. from the town council and others state that housing numbers in the town should be reduced with the removal of the site added between Regs. 18 and 19.

Green Infrastructure	Breckland DC have concerns over the focus of growth in the A11 Corridor, fearing implications for water and energy supplies and transport in the growth corridor in their district, the cumulative growth including both South Norfolk village cluster allocations and potential new settlements. Natural England state that the policy needs to be strengthened with regard to the delivery of green infrastructure with cross references to policy 3.
Non policy 1 iss A number of sig policies plan	ues raised nificant issues were raised under policy 1 which are of greater relevance to other plan
Infrastructure	 The Norwich Western Link (NWL) A number of reps. stated that the NWL should not be promoted through the GNLP or transport plans, with the main focus of opposition on impact on the Wensum SAC and increased emissions. A140 Omission of the upgrading of the A140 between Norwich and Ipswich and concentrating employment in the A11 corridor will not take advantage of growth generated by Freeport East at Felixstowe. Infrastructure needs are referenced but not quantified, with no indications of where or how they will be provided.
Sustainability Appraisal	No evidence in the Reg. 19 SA that land allocation has been selected based on the least environmental value or of a hierarchy of sustainability compliance.
Sites	A number of proposed allocated and non-allocated sites were supported as they could implement policy 1.
Energy efficiency	Lobby central government to insist on carbon zero building standards. For much of the plan period, the highest standards will not be required. Whole Life Cycle assessments for housing construction (as per London) and elimination of fossil fuel heating are required to reduce emissions.

Policy 2 Sustainable Communities

Topic	Main Issues raised
Water	1. No justification for applying an unknown potential future government
Efficiency	requirement; should be dealt with through a future local plan review
	2. Will policies on water efficiency be sufficient to cope with the cumulative
	growth of both the GNLP and Breckland?
Climate	1. No coherent climate adaptation policy; policy on climate change, energy etc is
Change/Energy	inadequate; does not reflect Government carbon emission targets;
	2. Electric vehicles will put further pressure on the already constrained energy
	network;
	3. Requirements for energy charging points cannot be in SPD;
	4. Requirements for energy charging points have not been taken into account in
	viability;
	5. Requirement for a 20% (or 19%) reduction against Part L of the 2013 Building
	Regulations is not supported by the evidence;
	6. The Greater Norwich Energy Infrastructure Study did not consider
	neighbouring Breckland district's power needs for the growth already in
	progress at Attleborough and Snetterton Heath or at Dereham.
Landscape	Reference to strategic gap policies should be deleted.

Policy 3 Environmental Protection and Enhancement

Topic	Main Issues raised
Main issues raised of direct relevance	
The Built and	1. Include more about the distinctive, unique heritage of the area to make the policy
Historic	more locally specific;
Environment	2. Add reference (policy and text) to Historic Landscape Characterisation and
	Landscape Character Assessments;
	3. Need for a historic environment topic paper, Heritage Impact Assessments of
	certain sites and also taller buildings evidence base.
The Natural	1. Natural England state that there are insufficient measures to ensure that adverse
Environment	effects on European Sites from visitor pressure would be avoided (as GIRAMS is
	not adopted). Therefore, the plan is not in compliance with the Habitats
	Regulations;
	2. Biodiversity net gain not included in viability – not demonstrated that allocations are deliverable;
	3. To deliver biodiversity net gain off-site there must be a mechanism for developers
	to pay into a central pot that will be used to deliver biodiversity;
	4. The need for GI to be met by development is not adequately defined;
	5. The policy and supporting text are inadequate to protect, maintain, restore and
	enhance the natural environmental assets of the area;
	6. Need to explain the hierarchies of site protection and mitigation.

Policy 4 Strategic Infrastructure

Topic	Main Issues raised
Transport	 Too much emphasis on traditional modes of transport and associated schemes, not enough detail on promoting walking, cycling and other forms of sustainable transport; The policy does not go far enough in terms of reducing carbon emissions and tackling climate change; Opposition to the possible construction of Norwich Western Link on the grounds of environmental damage; Concerns that the lack of an up to date transport planning/evidence base (e.g. LTP4 is still in draft stage) means there is disconnect between sustainable transport and spatial growth planning.
Other	1. Anglian Water has asked for minor modifications over some terminology;
Strategic	2. No coverage of waste-water infrastructure, the Water Cycle study and the Water
Infrastructure	Framework Directive;
	3. Norfolk Constabulary should be included within the strategic infrastructure
	element of policy 4, like health Infrastructure. There should also be a specific
	reference to a (forthcoming) Police Infrastructure Delivery Paper;
	4. There is no detail on the delivery of strategic Green Infrastructure (GI);
	5. There is no mechanism to secure education infrastructure.

General	1. Agents have promoted specific sites that they believe to be suitable to support the
	vision and ambition set out in Policy 4;
	2. Breckland District Council has concerns that the cumulative impact of growth
	identified in the plan could cause further strain on local power and water
	resources, waste management and transport infrastructure.

Policy 5 Homes

Topic	Main Issues raised
Affordable Housing	 The 28% and 33% affordable housing policy, if achieved, would over-deliver against the identified need; The reference to 'at least' 33% is ambiguous.
Viability Testing	Greenfield sites can face high development costs so viability testing should be allowed for at the planning applicate stage (as is allowed for brownfield sites).
Space Standards	There appears to be no robust evidence that would suggest that development below space standards is a concern in the GNLP area. The policy should provide flexibility to recognise need and viability, where necessary.
Accessible Housing	It will either be necessary to demonstrate a need for accessible housing or delete this part of the policy.
Specialist Housing	The need for 3,857 specialist retirement units in the plan area is based on evidence which is not currently publicly available. Even with the allocations proposed, there remains a significant unmet need for retirement homes and/or beds in residential institutions. Specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations (see Inspector's report on the Vale of Aylesbury Local Plan Policy H6).
Purpose built Student	PBSA should not be expected to contribute towards affordable housing provision. Paragraph 64(b) of the NPPF states that PBSA is exempt.
Accommodation (PBSA)	
Self/Custom- Build	 The Councils need to consider the robustness of their self-build register as an evidence base and indicator for demand for self-build plots; The Self/Custom-build has not been tested in viability appraisal work; Objections to fixed percentage for serviced self-build plots on larger housing sites (best in windfall policy 7.5).

Policy 6 The Economy (including Retail)

General points	Main Issues raised
	1. Most responses relate to the promotion of particular sites;
	2. There is a need for greater flexibility for the reuse/redevelopment of existing businesses;
	3. There is a need to allocate more land, including a large site, smaller sites and land for other types of employment generating uses;
	4. There is a need to ensure housing supports sustainable economic growth including town centres, the Cambridge Norwich Tech Corridor (CNTC) and the City Deal;
	5. The plan fails to capitalise on the opportunity to further support and direct employment growth to the CNTC;
	6. There are insufficient opportunities for economic development in rural areas;
	7. There is a need to allocate land to meet the needs of one particular business;
	8. There are concerns about the cumulative scale of growth, particularly in the CNTC, on Breckland;
	9. The policy does not provide the mechanisms to deliver jobs that fall outside the
	old B-class uses – the representation has been made in support of unallocated
	housing sites that include schools and care facilities.

Policy 7 Strategy for the Areas of Growth

Introduction

Topic	Main Issues raised
Process Issues	1. Flawed site assessment process (many reps. suggest flaws with the assessment
	process or HELAA or SA);
	2. Lack of consultation about increase in numbers at Aylsham;
	3. Objection to separate South Norfolk Village Clusters Plan.

Policy 7.1 The Norwich Urban Area including the fringe parishes

Topic	Main Issues raised
General	 Historic England state that the GNLP should include a policy for taller buildings and the skyline (a recommended scope of a study is provided in the rep.); Amend so that all the figures for the allocations are identified as minimums; Smaller employment sites should be allocated in key locations to address the impact of housing growth;

The City **Northern City Centre** Centre 1. The agent for the developer of Anglia Square suggests a number of amendments to align policy GNLP0506 with emerging proposals. 2. Clarification is needed that the objective to preserve office accommodation, potentially via an Article 4 Direction, would not apply to Anglia Square, where redevelopment of redundant offices for homes is welcomed. 3. Historic England continues to have significant concerns regarding the approach to development at Anglia Square, including the lack of an HIA; 4. The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay re. the Anglia Square allocation. Other elements of city centre policy 1. Include protection of valued cultural facilities (para. 92 NPPF); 2. Policy 7.1 is restrictive and not in accordance with NPPF and the revised Use Class Order. Greater flexibility is essential to enable vibrancy and viability. In store retail is declining exacerbated by the pandemic; leisure uses should not be restricted to a defined leisure area. 3. Both support for and objection to the deletion of the bullet point regarding landmark buildings at gateways to the city centre. **East Norwich** 1. Historic England have concerns: regarding the impact on Carrow Abbey /Carrow Priory. • over the capacity of the East Norwich sites - detailed HIA is required to inform the development/allocation potential of the sites; 2. The Broads Authority suggest some modifications re. navigation, mapping and the combined approach to the East Norwich sites; 3. The area is a long-term prospect with a high level of constraints and a history of non-delivery. Evidence does not suggest that the sites will come forward. 4. The area includes a County Wildlife Site. Clear policy is required to assess the acceptability of proposals that will affect it. 5. Covid-19 has changed home buyers' priorities (seek outdoor space + rural locations). Question whether demand exists for 4,000 dwellings in the area. Elsewhere in 1. Over reliance on the Growth Triangle for delivery within the plan period; the urban area 2. Thorpe St Andrew has no new allocations despite the availability of sites; 3. The parish of Honingham has been inappropriately classified as Urban Fringe in association with Easton (Honingham is a rural village). Distribution 1. The GNLP is overly reliant upon sites in the Norwich Urban Area, risking market and delivery saturation and slow delivery rates. of growth 2. Numerous allocations (75%) have been carried forward from previous local plans and have a track record of not delivering, with no promoter or developer on board. Some have a reliance upon public sector funding + public sector intervention to remedy market failure. 3. Historic England have concerns re. housing figures - Heritage Impact Assessments are required to test and inform the capacity of sites. 4. Insufficient account has been taken of the decrease in retailing in Norwich, which provides for significant redevelopment to housing. 5. Suggested solutions to 1 to 3 above include: New settlement/s; More rural development.

Contingency

- 1. The contingency site at Costessey is likely to be ineffective due to constraints. Multiple contingency sites should have been identified in a variety of locations and the trigger mechanism should be earlier than three years.
- 2. There is already saturation of allocation sites in the Norwich Urban Area, the contingency site compounds the issue. Under delivery would be better addressed through a more robust evidence-based supply and monitoring.

Policy 7.2 Main Towns

Topic	Main Issues raised
Aylsham	 Opposition from the Town Council and residents about both the site allocations and the process for their selection, focussing primarily on the addition of the Norwich Road site (GNLP0596R) being an increase of 83% in new homes from Reg.18 to Reg.19. Arguments against the allocation of 550 homes include: Pressures on infrastructure – on schools, doctors, highways, parking, water supply and sewerage; The lack of public consultation, and engagement with the Town Council, between Regulation 18C and Regulation 19 is criticised. The GNLP should be withdrawn and re-consulted upon. Support from a development promoter in Aylsham for the policy as written being consistent with para. 72 of the NPPF.
Diss (with part of Roydon)	Site promoters state that:
,	 Allocations in Diss are disproportionately low compared to other Main Towns; Housing allocations, including for older people's housing, should not be devolved to the Neighbourhood Plan; The GNLP should have addressed perceived highways constraints, as opposed to using this matter to limit growth in a highly sustainable town.
Long Stratton	Land promoters argue that the existing strategic allocation may not be deliverable and the GNLP should include a trigger for a review of allocations if the funding bid for the bypass is unsuccessful.
Wymondham	 Support from the promoters of Silfield Garden Village (SGV) for the approach as drafted limiting piecemeal 'edge' growth. SGV would enable: protection the strategic gap between Wymondham and Hethersett and mitigating recreational pressure on the Lizard County Wildlife Site by the provision of a new Bays River Park.
	 2. Challenges from promoters of sites on the edge of the town include: 'mixed messages' with contingency sites included in Reg. 18C; the low level of growth is contrary to the town's inherent sustainability and location on the A11 Cambridge to Norwich Tech Corridor; further growth would be supported by improvements to water capacity proposed by Anglia Water and improved access to the railway station; 'rolling over' the existing strategic gap policy to Hethersett without a new assessment is unsound; the development strategy for Wymondham effectively ends by 2030 on the basis that most AAP allocations will be completed by 2026, with approximately 500 dwellings to be delivered beyond that date.

Policy 7.3 Key Service Centres

Topic	Main Issues raised
Various	1. Developers and site promoters suggest the distribution through the settlement
Issues	hierarchy and/or within KSCs is disproportionate and Brundall, Hethersett, Loddon,
	Poringland, Reepham and Wroxham should have further allocations;
	2. Policy 7.3 does not provide for educational or care/retirement housing needs in
	Hethersett or support provision of sports facilities;
	Policy 7.3 should refer to the GI strategy rather than GI maps reproduced in GNLP strategy document;
	4. Mulbarton, Horford and Scole should be redefined as KSCs.

Policy 7.4 Village Clusters

Topic	Main Issues raised
Various	1. There are a number of objections to the production of a separate South Norfolk Village
Issues	Clusters plan. Concern about conflicting policies, an increase in excess of the minimum
	1,200 homes not being in accordance with the NPPF. As the spread of development in
	SN not known, the overall environmental impact has not been assessed;
	2. Insufficient mention or consideration of self/custom build;
	3. Too much growth in village clusters/objection to dispersal;
	4. Too little growth in village clusters, some of the increase in numbers between Regs. 18C
	and 19 should have gone to villages;
	5. Appraisal of settlement boundaries should be undertaken;
	6. Policy does not allow for growth and expansion of rural businesses, impact of Covid-19
	not adequately assessed, approach to employment overly restrictive;
	7. Policy fails to prioritise rural brownfield sites;
	8. Objection to the classification of Horsford as a village cluster rather than a KSC.

Policy 7.5 Small Scale Windfall Housing Development

Topic	Main Issues raised
Various	1. The policy is not clear on how it will operate in general and in relation to self-build;
Issues	2. The policy is contrary to other policies and aims of the plan to promote sustainable development. It promotes development in unsustainable locations which are not well related to services and promote car use and carbon emissions;
	3. The split between parishes for 3 or 5 dwellings is too crude and has monitoring and implementation issues;
	4. The policy does not deliver affordable housing (larger allocations would);
	Sites adjacent to groups of dwellings without a settlement boundary are isolated dwellings in the countryside and therefore contrary to the NPPF;
	6. The policy should allow for higher levels of growth e.g. 3 or 5 per site not per parish, or sites up to 9;
	7. The "First past the post" approach is unworkable and is not sound;
	8. The policy does not support rural growth;

9. Windfall and homes achieved from policy 7.5 should not be included in Table 6.

Policy 7.6 – Preparing for New Settlements

Topic	Main Issues raised
Various	1. The policy pre-determines work that has yet to take place on the future distribution of
Issues	growth;
	There is no evidence that sustainable extensions to existing settlements have been exhausted;
	3. Evidence from elsewhere demonstrates that new settlements struggle to provide affordable housing, particularly in their early stages;
	4. There is a need for extensive evidence on viability, deliverability and infrastructure requirements;
	5. There is a need for landscape character and heritage impact assessments (Historic England);
	6. There is a lack of and need for consultation and engagement;
	7. New settlements should be allocated now as they are more deliverable than some allocations.

Appendices

Topic	Main Issues raised
Appendix 1 -	1. Sewage treatment in Aylsham - there should be a clearer plan to address capacity
Infrastructure	shortfall before any housing development;
	2. There is a shortfall of provision in all aspects of health care;
	3. Police infrastructure requirements (based on forthcoming evidence) should be
	included in Appendix 1, with a cross reference to Policy 4;
	4. No infrastructure needs have been identified for Hingham, despite the cumulative
	impacts of development in the town.
Appendix 2 –	1. Definitions for Listed Building, Local List and Registered Park and Gardens are
Glossary	required.
	2. Change Scheduled Ancient Monument to Scheduled Monument.
Appendix 3 -	1. The plan is not carbon audited. It is not in line with the Climate Change Act (2008) as
Monitoring	required by national policy and guidance; and is unsound in relation to the duties
	around mitigation;
	2. The GNDP councils are significantly behind many leading authorities which have
	developed binding policies requiring new development to be net zero carbon,
	reducing carbon emissions in relation to retro-fitting buildings, energy generation and
	transport.
Appendix 6 –	1. A site-by-site list showing the anticipated delivery of housing to evidence the
Housing	trajectory is needed.
Trajectory	2. The divorcing of the village clusters plan from the GNLP means there is no evidence of
	the 1,200 homes expected from this part of the plan being deliverable.

2. The Sites

Introduction

- Lack of Heritage Impact Assessments. Insufficient information about the historic environment to support allocations, assessments don't follow Historic England methodology;
- Objections to separate South Norfolk Village Clusters plan.

Norwich

General Comments:

• Cllr Lesley Grahame and Green party representations suggest that: "Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target" for a number of sites within Norwich.

Policy CC2, 10-14 Ber Street:

 Historic England suggest key listed buildings affected by the development should be referenced. Policy wording should also reference 'Area of Main Archaeological Interest'

Policy CC4a, Rose Lane and Mountergate, land at Mountergate West:

- Anglian Water suggest additional policy criteria on existing surface water sewer on site.
- Cllr Lesley Grahame suggests that Rose Lane community garden should be a green space allocation. Employment welcome but must be compatible with high density residential.

Policy CC4b, Rose Lane and Mountergate, land at Mountergate East:

- The landowner's agent objects to the policy approach to the privately owned designated open space and the approach to landmark buildings. They also seek amendment to the uses on site to include a care home and remove educational facilities.
- Broads Authority request inclusion of early consultation with them in supporting

Policy CC7, King Street/Hobrough Lane includes 125-129 King Street and 131-133 King Street and Hoburgh Lane:

- Suggestion from landowner that policy should include criteria for viability appraisal at application stage due to difficult site constraints. Also requests acknowledgement of Norwich City Council's role in providing riverside access.
- Historic England require archaeological assessment to be included in policy criteria.
- Cllr Lesley Grahame suggests that the development must protect existing trees on site & provide proposed river access and walk.

Policy CC8, King Street, King Street Stores:

- Historic England suggest additional policy criteria requiring trial trenching prior to development.
- Policy intention to recreate historic streetscape should be replaced with priority to retrain the mature trees lining the boundary of the site (note that trees have TPOs).
- Cllr Lesley Grahame, Norwich Green Party and Historic England support retention of locally listed buildings on site.

Policy CC10, Land at Garden Street and Rouen Road:

 Policy criterion 1 & 2 are exactly the same, the repeated second point should be deleted.

Policy CC11, Argyle Street:

 Historic England suggest Archaeological Investigation requirement should be included in the policy criterion.

Policy CC15, Lower Clarence Road, car park:

- Policy should list nearby statutory listed buildings.
- Existing trees and hedges should be retained.
- Clause 2 is unclear regarding what is meant by 'built frontages'.

Policy CC16, Kerrison Road: Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way:

- Site promoter does not support provision of a public transport interchange on site and a public transport strategy for the wider east Norwich strategic regeneration area, but would support wording change to: "Facilitate potential for enhanced pedestrian and public transport access to the wider Norwich strategic regeneration area".
- Cllr Lesley Grahame would like to add 2 further points re-opening of train halt at Trowse + provision of open amenity space.
- Clarification required relating to numbers as there are consents on this site.
- Policy relating to river frontage relates to elements that have now commenced on site.
- Broads Authority suggest early engagement with them is added to supporting text.
- Approach to car free/low car housing should be consistent throughout relevant allocation policies.

Policies CC17 a and CC17b, Land at Whitefriars, Barrack Street:

• Sites referenced CC17a and CC17b are not being carried forward under these boundaries/policies. They have been replaced with GNLP0409AR and GNLP0409BR. It is assumed that the representation made here relates to the new site references: "This is acceptable and welcomed, subject to social housing, environmental standards and traffic neutrality that make the plan consistent with climate and planning legislation"

Policy CC18 (CC19), Oak Street and Sussex Street:

 Historic England suggest reference to the Area of Main Archaeological Interest and requirement to produce an archaeological assessment are included in policy criterion.

Policy CC24, Bethel Street, land rear of City Hall:

Historic England suggest reference to the Area of Main Archaeological Interest.

Policy CC30, Westwick Street car park:

• Historic England - need for a policy requirement for archaeological assessment.

Policy R1, The Neatmarket, Hall Road:

Promoting agent suggests greater flexibility of use classes in spirit of new class E;
 also, that wording relating to junction improvements should revert to that in existing policy.

Policy R13, Gas Hill, Site of former Gas Holder:

 Norwich Green Party and Cllr Lesley Grahame advocate retaining this site as woodland for biodiversity and climate objectives given the acknowledged constraints of the site.

Policy R17, Dibden Road, Van Dal Shoes and car park:

• The site promoter objects to the criterion relating to retention/reuse of existing buildings. Wording requiring 'high quality, locally distinctive design' repeats requirements of strategic policies & places undue emphasis on this site which is misleading.

Policy GNLP0068, Duke Street, land adjoining Premier Inn and River Wensum:

 Historic England suggest inclusion of reference to Area of Main Archaeological Interest.

Policy GNLP0133BR, Land adjoining the Enterprise Centre Earlham Hall (walled garden and nursery):

 Historic England suggest a Heritage Impact Assessment is required for the whole campus.

Policy GNLP0133C, Bluebell Road (UEA, land north of Cow Drive):

Anglian Water - existing water mains on site, suggest inclusion in policy.

Policy GNLP0133DR, Land between Suffolk Walk and Bluebell Road:

 Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities.

- Historic England suggest a Heritage Impact Assessment (HIA) is required for whole campus.
- Comprehensive objection from Yare Valley society allocation is contrary to national and local policies, the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0133E, UEA Grounds Depot:

- Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities. Suggest allocation removes building works in this area to protect green corridor of the Yare Valley.
- Support from Environment Agency as development is sited in Flood Zone 1 area of allocation site & is in accordance with SFRA & previous EA comments.
- Support from site promoter subject to suggested changes to be more flexible regarding scale and massing of allowed development & difficulty in achieving cycle & pedestrian connections to sites outside of their ownership.
- Comprehensive/substantial objection from Yare Valley society allocation is contrary to national and local policies as well as inconsistent with strategic policies of the GNLP; the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0401, Duke Street, former EEB site (Dukes' Wharf):

- Minor typographical/wording suggestions from Broads Authority.
- Support from Environment Agency and Historic England.
- Additional criteria relating to existing water main suggested by Anglian Water.

Policy GNLP0409AR, Land at Whitefriars:

- Support from Environment Agency 'text does not acknowledge that the site is in future Flood Zone 3a but flood risk issues should be able to be addressed on a site specific basis'.
- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested revisions to/re-ordering of policy wording by Historic England. Suggest inclusion of reference to Area of Main Archaeological Interest. Suggest a Heritage Impact Assessment is required for this site.

Policy GNLP0409BR, Land at Barrack Street:

- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested minor revision to policy wording by Historic England. Suggest a Heritage
 Impact Assessment is required for this site.

Objection from Site promoter - Mixed use requirement is not evidenced to be viable or deliverable, the allocation is inconsistent with strategic policies. The inconsistency of parking policies between local authority areas throughout the plan undermines the attractiveness of City sites for business/employment uses.
 Suggestion that the site boundary is not correct (however, boundary is in accordance with site promoter's reg 18C representation). Sustainability Appraisal is misleading as it refers to expired consents for this site. Site promoter has provided suggested alternative allocation policy wording.

Policy GNLP0451, Queens Road and Surrey Street, land east of Sentinel House:

- Objection from site promoter on behalf of developer the site has extant consent for student accommodation due to commence on site summer 2021. The site allocation policy is considered unsound for three reasons: i) Unjustified and ineffective heritage requirements. ii) Unjustified and ineffective approach to affordable housing. iii) Unjustified and ineffective approach to landscaping and biodiversity. (Suggested revision to policy wording to make sound provided by agent)
- Minor alterations to wording and reference to the Area of Main Archaeological Interest into the policy suggested by Historic England.

Policy GNLP0506, Anglia Square:

- Agent on behalf of site developer suggests that the site boundary should be extended to include the area underneath the flyover. A comprehensive suggestion for revised supporting text has been provided by the agent. The agent has also suggested a comprehensive review of the allocation policy wording.
- Additional criteria relating to existing water mains, foul and surface water sewers suggested by Anglian Water.
- Significant concerns raised by Historic England relating to scale height and density. Suggestion that the allocation figure should be reduced from the current 800 to 600. Aside from housing, the permissible extent of other development on site is unclear. A Heritage Impact Assessment (HIA) should be prepared for the site. Suggested reinstatement of historic street pattern and suggested wording revision provided to policy.
- Comprehensive objection from Norwich Green Party consider the policy repeats
 the same elements which lead to a lack of public support for the rejected scheme.
 800 homes should be a maximum and this figure should include any potential
 student accommodation. Objection raises issues relating to: existing artistic
 community, provision of multi-storey car park/carbon emissions, more ambitious
 energy efficient design, landmark building. Proposal should reflect medieval street
 pattern, reference green open space and high-quality landscaping; low car
 environment.

Policy GNLP1061R, Land north of Norwich International Airport, Imperial Park:

- Historic England suggest reference to nearby Horsham St Faith Conservation area and heritage assets is made within policy.
- Site promoter on behalf of site owner supports an allocation subject to changes to
 policy requirements. Site boundary to be extended to include land at Petans, policy
 needs to provide a mixture of aviation and non-aviation uses in line with endorsed
 airport masterplan (current policy wording is inconsistent and overly restrictive).
 Ancillary uses should also be allowed to make site more sustainable.

Policy GNLP2114, Muspole Street, St Georges Works:

• Objection from site promoter. 110 homes, 5,000 sqm offices/managed workspace and potentially other ancillary uses is not achievable. Revised wording suggested.

Policy GNLP3054, Duke Street, St Marys Works:

- Historic England suggest that a detailed HIA is prepared for this site. Minor amendment of policy wording and reference to the Area of Main Archaeological Interest into the policy suggested.
- Site promoter objection number of homes should not be 'minimum' but 'in the region or order of'. The requirement to justify the housing type against a local community need is not considered to be justified or consistent with national policy. Suggestion that policy is amended to allow full or part retention of the locally listed building. Suggested revision to policy wording provided in representation.

East Norwich Strategic Regeneration Area

- Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the success or otherwise of the project.
- Opportunity to provide pedestrian and cycle links to Whitlingham enabling reduced carbon emissions through sustainable modes of transport.
- Introduction of a road bridge to Yarmouth Road would change the quiet suburban character of Thorpe, add noise and pollution, reduce air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas.
- Resident consultation is vital in the design and development of this new site.
- Low car development would reduce harm. Energy efficiency standards should reflect the best aspirations.
- Suggest opening former rail halt at Trowse to serve ENSRA & County Hall + bus connections to UEA, NRP & N+N Hospital.
- Potential impact of ENSRA on Whitlingham Country Park should be mitigated by extending the country park to cater for increased demands.
- The area is prone to flooding and development will need to mitigate against this risk.
- Any energy generation should be from recognisably clean sources (not combustion).

- Policy map should show area of utilities site in the Broads Local Authority area (allocated in their adopted local plan)
- The functioning of existing Carrow Yacht Club should be protected in the policy.
- The presence of County Wildlife Site does not preclude development, and this should be made clear in the allocation policy.
- Environment Agency "Whilst we are able to find this allocation sound, there is no mention of the need to preclude development on a large part of GNLP0360 due to being Flood Zone 3b, and there is no mention on the need to not increase flood risk elsewhere and therefore provide flood storage. There is lots of mention of 'flood resilient construction' when this tends to mean the buildings can recover from a flood, while we would require buildings to have raised floor levels to prevent them flooding in the first place. It is however possible that perhaps this is just differing terminology and the intention is the same as us. It is positive that the SFRA Site Summary Table includes lots of detail as to what is required to develop the site, so therefore this information should be covered here."
- Historic England raise significant concern with the proposed number of dwellings allocated which may have a harmful impact on the historic environment (there are numerous heritage assets on this site). Strongly advise that a HIA is prepared for ENSRA sites. Some suggested amendment to wording has been provided by Historic England.
- Dentons suggests that the viability and therefore deliverability is not sufficiently evidenced. This should not be deferred to an SPD stage. The requirements of the ENSRA SPD have not been adequately established in policy 7.1 and site allocation GNLP0360/3053/R10. This relates to the scope, timing and scale of the masterplanning process and whether elements of it are Justified and will be Effective.
- Rosconn Group No evidence that ENSRA will realistically yield this level of development in GNLP plan period. Significant Infrastructure requirements and flood risk indicates that site is more appropriate for long term than medium-long term. L2SFRA indicates areas of land in floodplain likely to affect amount of land available for development & mitigation needed. But no sequential test evidence is provided to demonstrate selection of these sites instead of sites elsewhere.

Norwich Site Assessment Booklet:

- Site GNLP0478 (Land east of Green Lane West) has not been allocated due to Highways related reasons it is suggested that an engineered solution could be found & that the site should be allocated.
- Land allocated at Colney Hall is misleading to allocate the entire area as it contains historic parkland that should not be developed & which is outside of the development boundary.
- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford. The number of homes allocated does not respect the figure of 1,200 in the adopted Cringleford Neighbourhood Plan. The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase

- over planned residential dwellings without providing evidence of need for the additional housing in Cringleford. Challenge that the plan meets the criteria of compliance with duty to cooperate (disregard of neighbourhood plan & parish council comments to previous consultations).
- Historic England suggest site assessments appear to be lacking. The assessments do not follow the 5-step methodology set out in HE advice note 3. They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets and do not consider mitigation and enhancement. This is of particular concern for sites where additional HIA was recommended at reg 18 but has not been carried out. Concerns regarding the indicative capacity of a number of sites. HE considers that Norwich's historic character is under pressure. we consider that it is essential evidence base document is prepared outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City.

<u>Urban Fringe</u>

- Historic England The changes made to Site Policies in view of comments made at Reg 18 are welcomed. Continue to advise that Heritage Impact Assessments (HIAs) should be prepared in advance of the EiP. This applies to Colney Hall GNLP0253 in particular.
- Costessey COS3/GNLPSL2008 (Overwood Lane) changes to Settlement limit suggested.
- **KES2 employment site** has the capacity to deliver in the region of 30, 000 sq. meters of employment floorspace so expansion suggested.
- Further evidence of Housing Need is required to justify increase in numbers at
 Cringleford in relation to NP and site allocated with uplift.
- Showground, Costessey COS5/GNLP2074
 - o amendments suggested to include small restaurants, café, PH, etc.
 - o retail and leisure will add greatly to the over stretched local road network and contradicts Policy 2 of Neighbourhood Plan.
- The site at **Farmland Road, Costessey**, offers an appropriate opportunity to deliver growth in a manner that is appropriate.
- Drayton Site DRA1 Carried Forward Sites / Planning permissions / GNLP Policy Requirements require update to reflect permissions.
- Drayton GNLP0290 (unallocated) Recommended changes to Policy 5 to enable viability of care homes, and Policy 3- as it does not specifically refer to CWS proposed amended text to set out a clear benefit a development can provide, such as a 10% biodiversity net gain.
- Taverham site 0337R should include Police Station Norfolk Constabulary / NPS (DTC)
- Code Developments (Horsford) on behalf of Drayton Farms The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLP0337(Taverham), identified contingency site GNLP2043/0581 and the rejection of Reasonable Alternative sites GNLP0332R and GNLP0334R (Hellesdon

- **north)** as site assessment is not transparent. Legal opinion obtained. Additional medium sized site allocations should be identified in order to reduce the overreliance of the plan's supply of housing on large-scale development sites. Site HEL4/GNLP1019 allocated for Open Space should be deleted and considered for housing under sites GNLP0332R and GNLP0334R instead.
- Code Developments Hellesdon (on behalf of Jarrolds) objects to Site
 Assessment and outcome of not allocating clients' Site GNLP2173 for Housing.
 There are inconsistencies in Site Assessment and SA Report approach taken between HEL1 'carried fwd sites' and 'new sites' GNLP2173.
- Easton PC DTC Easton EAS 1: objection to the additional 90 dwellings on the last parcel of allocated land, to the east of Easton Gymnastics Club.
- Lanpro Rackheath GNLP2166 should be allocated for 200 dwellings as unlikely to impact to Rackheath Hall unlike GNLP0132
- La Ronde Wright Sprowston New site promoted west of Blue Boar Lane near garden centre - unallocated in the GT AAP
- **Bidwells** Sprowston GNLP0132 Request flexibility on affordable housing requirement due to infrastructure requirements for High School and additional requirements by AW for pumping station to serve the surrounding area.
- Sprowston Request that GNLP3024 is allocated for mix and community uses to complement nearby housing developments.
- Norfolk Wildlife Trust Sprowston recommended text modification to site
 GNLP0132 adjacent to Ancient Woodland -GI requirement
- The SFRAs done are defective as maps have not been followed through properly.
 With regards to the NEGT, massive development has been approved within a massive flood plain that is close to sea level and where tidal effects are observable for miles.
- Broads Authority- recommended text for clarity for Policy 3 with respects to the built and historic environment. heritage impact assessment is required by government guidance for any application that affects any heritage asset or their setting.

Main Towns

Aylsham

- Substantial objections from 65 residents, as well as Aylsham Town Council, concentrating on the addition of GNLP0596R, and the increase in housing requirement to 550 new dwellings, without further consultation prior to progressing to the Regulation 19 stage. The soundness of the GNLP is challenged, in respect to its evidence and justification for the housing allocated. Issues include the demand on infrastructure such as highways and education provision, and sewerage capacity.
- An objection from the promoters of site GNLP0336 west of A140 argues for the inclusion of their site - the assessment process failed to take account of a variation of their proposal that would provide 150 homes instead of 300 homes.

- In relation to GNLP0596R on Norwich Road the promoter has reiterated their support for the site's allocation, whilst clarifying that the policy should be amended to exclude pedestrian connections via Copeman Road. Historic England raises the potential impact on the nearby Grade II Diggens Farmhouse. A minor modification put forward by Anglian Water is to amend the policy wording to allow for access to maintain the foul drainage infrastructure running through the site.
- In relation to GNLP0311/0595/2060 on Burgh Road the promoter has reiterated their support for the allocation, whilst suggesting minor modifications to reduce the carriageway width, and to clarify that their obligation is to provide land for the school (and not the school itself). A minor modification is put forward by Anglian Water to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the site.

Diss

- Objections from promoters that focus upon the strategic growth figure for Diss, and the devolution of site allocations to the Neighbourhood Plan. Sites in question include: DIS1, DIS3, GNLP0250/0342/0291, GNLP0599, GNLP1044, and GNLP1045.
- Diss Town Council state that a footway/cycleway is required as part of GNLP01022 (Frontier Site) northwards towards to join Frenze Hall Lane.

Harleston

- Minor modifications are put forward by Anglian Water to allocation policies GNLP2108, GNLP2136, HAR 4, HAR 5, and HAR 6 to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the sites.
- A development promoter wishes to see the settlement boundary to the south of Harleston redrawn around GNLP2109 and GNLP2136.

Hethel (Strategic Employment Area)

- The settlement boundary should be updated, reflecting changes such as the development of the Classic Team Lotus building.
- Norfolk Wildlife Trust states that policies should specifically address potential impacts on the County Wildlife Site and ancient woodland from impacts including encroachment and light pollution.
- Historic England state that policies should mention the impacts on nearby Grade II listed Little Potash/Brunel House and Corporation Farmhouse.
- Promoters on behalf of Goff Petroleum object to the non-allocation of their site for a new energy research centre (site reference GNLP0116R).

Long Stratton

• The strategic approach to Long Stratton should be changed, with promoters arguing for inclusion of their site GNLP0354, GNLP4033, and GNLP4034.

Wymondham

 The strategic approach to Wymondham should be changed, with promoters arguing for inclusion of their sites GNLP006 (north Wymondham) and GNLP0320 (south of Gonville Hall Farm). A generic comment from the Environment Agency for all Wymondham site
allocations states that the latest version of the Water Cycle Study shows that
Wymondham Water Recycling Centre will be over capacity post growth. The latest
findings and recommendations from the WCS should be incorporated and reflected
in the Local Plans and Site Allocations.

Key Service Centres

- Broads Authority would like dark skies consideration inserted into Acle site policy;
- Acle site promoter wants additional policy requirement for phasing plan for road;
- In Acle, Brundall, Hethersett, Hingham, Loddon, Anglian Water requests additional policy and supporting text elements in some sites with underlying water assets;
- Developers and site promoters suggest sites in Blofield should be allocated/included in settlement boundary;
- Pigeon proposed a school on GNLP0352 in Brundall, but this use was not assessed;
- Brundall BRU2 Unsound to allocate for open space as housing permitted and development has commenced;
- Page 40 of Hethersett site assessment booklet contains an error in that the site descriptions have been set under the wrong heading;
- Site GNLP0503 in Hingham has been withdrawn during Reg19;
- GNLP0520 Hingham Site policy for surface water only deals with site, not lower surrounding areas;
- Chedgrave PC considers duty to co-operate has been failed, entire process has been inadequate re involvement of public.
- Richard Bacon: Plan does little to address education needs in Poringland. NCC has need and funding allocation for primary school in Poringland, plan should address this.
- Reepham GNLP0353R in 2019 use changed to include employment land 1.6ha (as well as housing and potential expansion of GP). Part 1 booklet neglects to mention employment. Rep has not been taken into account when selecting sites contrary to reg 18(3) which requires all reps taken into account. Reg18C rep repeated employment, and submitted access strategy. Highways view unchanged. (NB site booklet did not include employment in table stage 1 (part 3, post-reg18c) but correct description in stage 4.)
- Reepham REP1 allocation is not deliverable, as evidenced by application 20200847, viability information of which shows 141 homes, only 20% affordable housing, and sports hall on alternative site (stated by developer).
- Unsound not to allocate housing in Poringland, partly due to dispersal strategy.
 Commitment has reduced as housing has been delivered in the village. GNLP0494R is suitable, available, deliverable. Site access given as constraint, but access was not disputed by Highways Authority in recent application 2017/2871. For GNLP0485R, failed to consider school and country park while pressing need for school in Poringland and GI in Greater Norwich. Highways Authority have not considered evidence submitted during Reg18C.

 Hingham booklet: contradictions in site assessments, decisions on some sites are flawed, not based on proportionate evidence. Highway Authority evidence is disputed, mitigation afforded to allocated sites could be applied to other sites. No reference to town centre. Conclusion in booklet justifies predetermined decision to allocate 0520.

Broadland Village Clusters

- Anglian Water objections regarding assets within the boundary of allocated sites, requesting new text and policy requirement (BLO5, 0297, FOU2, 0264, HNF1, 0188);
- Foulsham significant opposition focussing on issues of historic hedgerow and access;
- Horsford recent flooding being investigated by NCC;
- Horsham St Faith increase in numbers without consultation, Historic England objection – request for HIA;
- Lingwood introduction of 4016 without consultation;
- Marsham alternative site 3035, Historic England objection request for HIA;
- Lack of allocation in Great and Little Plumstead cluster;
- Reedham lack of consistency no safe route to school;
- South Walsham potential change of access point.

Non-Residential

- Policy BKE3 -- Brooke Industrial Estate Norfolk Wildlife Trust request policy update to include an ecological assessment to reflect proximity to Atlas Gravel Workings CWS.
- Review of strategic gaps required. The promoter of GNLP0177-BR has completed
 an initial assessment for the Hethersett- Cringleford strategic gap. They argue that
 development can be accommodated without resulting in coalescence between the
 two settlements.

Costessey Contingency Site

- **Historic England** A Heritage Impact Assessment be undertaken.
- Code Developments Additional contingency sites should be identified.
- Barton Wilmore As the site can deliver educational land at the beginning of the period it should be a full allocation. Revisions to site policy include 977 dwellings @35 dph.
- **Client Earth** Site could contribute towards the urbanisation of countryside.
- **Various sites** suggested for allocation instead of having a contingency site.

3. Evidence Studies

Equalities Impact Assessment

Highway safety concerns (Raised by Hingham Town Council – specific to Hingham)

Green Infrastructure Study

Hingham Conservation area is out of date, the boundary was revised in 2016.
 Need to know if any other boundaries used are out of date.

Gypsy and Travellers

- The Gypsy/Traveller Accommodation Assessment is flawed, failing to take proper account of need and supply;
- Accusations of improprieties in planning overall leading to extensive breaches of Human Rights and Equalities legislation.

Habitat Regulations Assessment (HRA)

- Not legally compliant HRA incomplete.
- Not sound inadequate evidence to demonstrate that no adverse effects on European Sites (incomplete HRA) (both Norfolk Wildlife Trust).

HELAA

• Incorrect HELAA assessment of sites at Coltishall and Silfield Garden Village

Statement of Consultation

- Lack of Reg 18d consultation for people to have their say
- SNC SCI not complied with and consultation not on the 'Have your Say page of the SNC website

Strategic Flood Risk Assessment

- Fundamental concern with the production and use of FRAs and SFRAs for development sites – not just locally, but nationally;
- A single map linking the all groundwater flood susceptibility areas in GNLP and one for Surface Water flood areas would give a holistic picture for these matters in the GNLP area;
- It is surprising that maps showing the extent of major floods have not been produced;

- It would be informative if planners published information on the number and location of flooded properties in their area in the last 50 years and the dates when these properties were built;
- Allocation of site on land north of Tuttles Lane East, Wymondham (currently unallocated) is suggested would alleviate flood issues related to the river Tiffey.

Sustainability Appraisal

- Spatial strategy is not justified other reasonable alternatives have not been properly appraised;
- SA is flawed in its assessment of specific sites and consideration of alternatives (inc strategic alternatives e.g. Hethersett / Cringleford, Silfield Garden Village proposal, Long Stratton);
- SA findings support a different approach to site allocation avoiding as far as possible new development on greenfield land and in unsustainable locations (e.g. KSCs and villages);
- Contingency sites not justified (based on size and not speed of delivery);
- Carried forward allocations have not been treated comparably with other sites (no evidence or proper assessment);
- SA is inadequate in terms of carbon assessment and addressing climate change.

Viability Study

- Benchmark Land Value (BLV) -- £100,000/acre is not justified. The £348,000/acre adopted in the 2017 Hamson CIL is fully supported by a respondent.
- Typology 11 (strategic sites) the gross to net areas assumption is unrealistic. To achieve 88% net to gross site area on a Typology 11 development is not practical or feasible in reality.
- Revenue Assumptions are not sound concern exists that the private sale revenues assessed in the Viability Appraisal remains excessive. Using the housebuilder's actual sale prices (all of which are publicly accessible on Land Registry), the range of values recorded was £1,866/m2 to £3,634/m2.
- Developer Profit on Gross Development Value (GDV)— the reduction from 20% to 17.5%. The reduction in developer profit is un-justified.
- Build costs for apartments –the appropriate BCIS rate should be applied.
- The Viability Appraisal does not include a typology to fit the East Norwich Strategic Regeneration Area and specific viability appraisals for strategic sites are not provided.
- Sales-values, build costs and benchmark land values are too generic and not backed up by comparable evidence.

Water Cycle Study

Summary of main issues raised:

- Not legally compliant WCS incomplete and so insufficient evidence to meet Habitat Regulations
- Not sound WCS incomplete so insufficient evidence on water quality to show no impacts on SACs (both Norfolk Wildlife Trust).



Agenda Item: 6 Cabinet 19/07/2021

Long Stratton Neighbourhood Plan – Consideration of Examiner's Report

Report Author(s): Richard Squires

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Portfolio: External Affairs and Policy; Stronger Economy

Ward(s) Affected: Stratton; Forncett

Purpose of the Report:

South Norfolk Council has received the independent examiner's report in relation to the Long Stratton Neighbourhood Plan. The examiner suggests several recommended modifications to the Neighbourhood Plan and concludes that, subject to these modifications, it should proceed to referendum. South Norfolk Council now needs to decide whether it is satisfied with these recommendations.

Recommendations:

1. Cabinet to approve each of the recommended modifications of the independent examiner of the Long Stratton Neighbourhood Plan, as detailed within the examiner's report, and publish a Decision Statement setting out the Council's response to the examiner's recommendations and announcing the intention for the Neighbourhood Plan to proceed to a referendum.

1. Summary

- 1.1 South Norfolk Council has now received the report of the independent examiner appointed to inspect the submitted Long Stratton Neighbourhood Plan (see Appendix 1). In accordance with paragraph 12 of Schedule 4B of the Town & Country Planning Act 1990, South Norfolk Council should now decide on what action to take in respect of each of the examiner's recommendations.
- 1.2 The examiner suggested 11 recommended modifications to the Neighbourhood Plan in order to ensure it meets the Basic Conditions of neighbourhood planning. On the basis of these modifications being made, the examiner is satisfied that the Plan should proceed to a referendum.

2. Background

- 2.1 The submitted Long Stratton Neighbourhood Plan (which can be viewed here) was approved by South Norfolk Council on 15th March 2020. This was followed by a statutory six week publication period in which the Plan and its supporting documents were made available for inspection and subject to representations from the public and stakeholder bodies. This is in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.
- 2.2 During the six week publication period, which took place between 22 March and 6 May 2021, a total of 49 representations were received from 22 different organisations/individuals (click here for details of responses). These representations were submitted, along with the Neighbourhood Plan and supporting information, to the independent examiner, Mr Andrew Freeman, the appointment of whom was confirmed by South Norfolk Council in mid-May.
- 2.3 The examination was conducted via written representations during May/June 2020 (the examiner deciding that a public hearing would not be required).

3. Current position/findings

- 3.1 The recommended modifications are set out in the examiner's report. However, for ease of reference, all of the examiner's recommendations and the proposed responses from South Norfolk Council are set out in the Decision Statement, comprising Appendix 3 to this report.
- 3.2 Each of the recommendations involves modifying the wording of policies within the Neighbourhood Plan, to bring them in line with the Basic Conditions of neighbourhood planning, as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. None of the Neighbourhood Plan policies have been recommended for deletion.
- 3.3 During the regulation 16 publication stage, South Norfolk Council submitted four representations relating to different elements of the submitted Plan. These representations, the examiners recommendations relating to the respective elements of the Neighbourhood Plan, and some subsequent commentary from

- Council officers for the purposes of this report, are available to view within Appendix 2.
- 3.4 In reviewing the examiner's recommendations, some of which address the representations made by the Council more so than others, officers do not feel that the issues presented would necessitate a proposal by the Council to take a different view to that of the examiner. Officers are content with the recommended modifications of the examiner.
- 3.5 The Long Stratton Neighbourhood Plan group has confirmed that it is satisfied with the recommended modifications of the examiner.

4. Proposed action

- 4.1 It is proposed that South Norfolk Council approves each of the examiner's recommended modifications, as detailed in his report, and authorises the Neighbourhood Plan to proceed to a referendum within the neighbourhood area.
- 4.2 Following this decision, officers will publish the Council's Decision Statement on its website and notify Long Stratton Town Council and those individuals and organisations which responded at the Regulation 16 publication stage.
- 4.3 This will fulfil South Norfolk Council's obligations in terms of paragraph 12 of Schedule 4B of the Town & Country Planning Act 1990.

5. Other options

- 5.1 South Norfolk Council could decide not to approve either one of the examiner's recommendations, should it wish, and make alternative proposals.
- 5.2 However, should the local planning authority propose to make a decision that differs from any of the examiner's recommendations (and the reason for the difference is wholly or partly as a result of new evidence or a new fact or a different view taken by the authorities about a particular fact) then the local authority:
 - (a) is required to notify all those identified in the Neighbourhood Plan consultation statement about this position and invite representations over a six week period;
 - (b) may refer the issue to an independent examination if it is considered appropriate.
- 5.3 Officers do not consider that any of the examiner's recommended modifications would prevent the Neighbourhood Plan from meeting the Basic Conditions set out in paragraph 8 of Schedule 4B of the 1990 Act.

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. MHCLG has recently confirmed that this funding will continue to be available to local planning authorities during 2021-22.
- 6.4 **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.
- 6.5 **Equality Implications** An Equalities Impact Assessment has been completed on the submitted Neighbourhood Plan.
- 6.6 **Environmental Impact** Habitats Regulation Assessment and Strategic Environmental Assessment Screening Reports have been produced for the Plan and agreed with the Environment Agency, Historic England and Natural England.
- 6.7 **Crime and Disorder** The Plan is not likely to have any impacts on crime and disorder, nor is it likely to have any impacts on disadvantaged groups.
- 6.8 **Risks** No other particular risks associated with the Neighbourhood Plan are identified.

7. Conclusion

7.1 In accordance with the conclusions of the independent examiner, it is proposed that Cabinet agree to make the recommended modifications to the Long Stratton Neighbourhood Plan and to approve it for a referendum within the neighbourhood area.

8. Recommendations

8.1 Cabinet to approve each of the recommended modifications of the independent examiner of the Long Stratton Neighbourhood Plan, as detailed within the examiner's report, and publish a Decision Statement setting out the Council's response to the examiner's recommendations and announcing the intention for the Neighbourhood Plan to proceed to a referendum.

Background papers

<u>Long Stratton Neighbourhood Plan – Submission Version</u> <u>LSNP Regulation 16 Consultation Responses</u>

Appendix 1: Long Stratton Neighbourhood Plan Independent Examiner's Report

Appendix 2: South Norfolk Council Reg. 16 representations and examiner responses

Appendix 3: Long Stratton Neighbourhood Plan – Decision Statement



Report on Long Stratton Neighbourhood Plan 2019 to 2036

An Examination undertaken for South Norfolk Council with the support of Long Stratton Town Council on the January 2021 submission version of the Plan.

Independent Examiner: Andrew S Freeman BSc (Hons) DipTP DipEM FRTPI

Date of Report: 5 July 2021

Intelligent Plans and Examinations (IPE) Ltd, 3 Princes Street, Bath BA1 1HL

Contents

	Page
Main Findings - Executive Summary	3
1. Introduction and Background	3
 Long Stratton Neighbourhood Plan 2019-2036 	3
The Independent Examiner	4
The Scope of the Examination	4
The Basic Conditions	5
2. Approach to the Examination	5
 Planning Policy Context 	5
Submitted Documents	6
Site Visit	6
 Written Representations with or without Public 	7
Hearing	
 Modifications 	7
3. Procedural Compliance and Human Rights	7
 Qualifying Body and Neighbourhood Plan Area 	7
Plan Period	7
 Neighbourhood Plan Preparation and Consultation 	7
 Development and Use of Land 	8
Excluded Development	8
Human Rights	8
4. Compliance with the Basic Conditions	8
EU Obligations	8
Main Issues	9
Issue 1: Housing	9
Issue 2: Design and Character	11
Issue 3: Employment	11
Issue 4: Outdoor Recreation, Green	12
Infrastructure and Biodiversity	
Issue 5: Community Facilities	12
Other Policies	13
 Conclusions on the Main Issues 	13
5. Conclusions	13
 Summary 	13
 The Referendum and its Area 	13
 Overview 	14
Appendix: Modifications	15

Main Findings - Executive Summary

From my examination of the Long Stratton Neighbourhood Plan (the Plan) and its supporting documentation, including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – Long Stratton Town Council;
- The Plan has been prepared for an area properly designated Long Stratton Neighbourhood Area Figure 2.1 on Page 11 of the Plan;
- The Plan specifies the period to which it is to take effect 2019 to 2036; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Long Stratton Neighbourhood Plan 2019 to 2036

- 1.1 Long Stratton is a town in South Norfolk District. It is located halfway between the county city of Norwich and the market town of Diss. The town lies astride and to the west of the busy A140 Norwich Road which is a Roman-built road between Cromer and Ipswich running in an approximate north-south direction through the Neighbourhood Area. Long Stratton is home to the headquarters of South Norfolk Council and to about 4,500 residents.¹
- 1.2 The Neighbourhood Area was formally designated by South Norfolk Council on 8 June 2016. The area designated includes the whole of Long Stratton Parish as well as southern parts of the Parish of Tharston and Hapton. The draft Plan is being progressed by Long Stratton Town Council.
- 1.3 Preparation of the Plan has been carried out in four distinct phases, inception, initial plan development, advanced plan development and formal pre-submission consultation under Regulation 14. The Plan now

¹ Draft Plan, Paragraph 2.13.

submitted has a vision and objectives together with 22 policies under eight topic headings.

The Independent Examiner

- 1.4 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Long Stratton Neighbourhood Plan by South Norfolk Council with the agreement of the Long Stratton Town Council.
- 1.5 I am a chartered town planner and former government Planning Inspector with over forty years' experience. I have worked in both the public and the private sectors. I am an independent examiner and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.6 As the independent examiner, I am required to produce this report and recommend either:
 - (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.7 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ("the 1990 Act"). The examiner must consider:
 - Whether the Plan meets the Basic Conditions.
 - Whether the Plan complies with provisions under Section 38A and Section 38B of the Planning and Compulsory Purchase Act 2004 (as amended) ("the 2004 Act"). These are:
 - it has been prepared and submitted for examination by a qualifying body for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land;
 - it specifies the period during which it has effect;
 - it does not include provisions and policies for "excluded development"; and
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area.

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- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
- Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').
- 1.8 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

- 1.9 The "Basic Conditions" are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
 - have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan for the area;
 - be compatible with and not breach European Union (EU) obligations (under retained EU law);² and
 - meet prescribed conditions and comply with prescribed matters.
- 1.10 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.³
- 2. Approach to the Examination

Planning Policy Context

2.1 The Development Plan for this part of South Norfolk Council, not including documents relating to excluded minerals and waste development, is the South Norfolk Local Plan. In addition, there is an emerging Local Plan in the form of the Greater Norwich Local Plan (GNLP), which was subject to

² The existing body of environmental regulation is retained in UK law.

³ This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

- pre submission Publication Stage consultation from 1 February 2021-22 March 2021.⁴
- 2.2 The South Norfolk Local Plan includes various development plan documents. Of relevance are the Joint Core Strategy, the Long Stratton Area Action Plan (AAP), the Site Specific Allocations and Policies Document and the Development Management Policies Document.
- Planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published on 19 February 2019 and all references in this report are to the February 2019 NPPF and its accompanying PPG.

Submitted Documents

- 2.4 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including:
 - the draft Long Stratton Neighbourhood Plan 2019 to 2036, January 2021:
 - a map of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
 - the Consultation Statement, December 2020;
 - the Basic Conditions Statement, December 2020;
 - the Long Stratton Neighbourhood Development Plan Screening Opinion for SEA,⁵ 17 March 2020;
 - the Long Stratton Neighbourhood Plan Habitat (sic) Regulations Assessment (HRA) Screening Report 2019;
 - Long Stratton (and parts of Tharston and Hapton Parish) Housing Needs Assessment, December 2017;
 - Long Stratton Design Guideline, November 2020;
 - Long Stratton Masterplanning Report, January 2018;
 - Demographic & Socio-Economic Review of Long Stratton 2017;
 - all the representations that have been made in accordance with the Regulation 16 consultation; and
 - the Examiner's questions of 18 May 2021 and the Town Council's response received on 1 June 2021 (dated May 2021) and South Norfolk District Council's response of 24 May 2021.

Site Visit

2.5 I made an unaccompanied site visit to the Neighbourhood Plan Area on 31 May 2021 to familiarise myself with it and to visit relevant sites and areas referenced in the Plan and evidential documents.

⁴ See the advice in relation to the emerging GNLP in PPG Reference ID: 41-009-20190509.

⁵ Strategic Environmental Assessment.

⁶ View at: https://www.southnorfolkandbroadland.gov.uk/downloads/download/54/long-stratton-neighbourhood-plan

Written Representations with or without Public Hearing

2.6 This examination has been dealt with by written representations. I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum.

Modifications

- 2.7 Where necessary, I have recommended modifications to the Plan (PMs) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.
- 3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Long Stratton Neighbourhood Plan has been prepared and submitted for examination by Long Stratton Town Council which is a qualifying body for an area that was designated by the South Norfolk Council on 8 June 2016.
- 3.2 It is the only neighbourhood plan for Long Stratton Neighbourhood Area and does not relate to land outside the designated Neighbourhood Plan Area.

Plan Period

3.3 The Plan specifies clearly the period to which it is to take effect, which is from 2019 to 2036.

Neighbourhood Plan Preparation and Consultation

- 3.4 Details of plan preparation and consultation are set out in the Consultation Statement dated December 2020. At the outset, the inception stage involved the setting-up of a steering group. This was followed by the first stage of public consultation including, in particular, a survey seeking people's views.
- 3.5 The initial plan development stage took place between May 2017 and December 2018. Various engagement activities were involved as well as evidence gathering and consideration of the scope of the emerging Plan. At the advanced stage, this informed writing of a first draft of the Neighbourhood Plan followed by further consultation and development of the pre-submission draft.

- 3.6 The Consultation Statement records 29 discrete responses from the Regulation 14 stage which took place between 12 October and 7 December 2019, together with the actions take. Fifteen responses were from statutory consultees and 14 from residents. Regulation 16 consultation was carried out between 22 March 2021 and 6 May 2021. Representation covering a variety of matters were submitted by 22 different parties including residents, statutory consultees and developers.
- 3.7 I confirm that the legal requirements have been met by the consultation process. In addition, there has been regard to the advice in PPG on plan preparation and engagement.

Development and Use of Land

3.8 The Plan sets out policies in relation to the development and use of land in accordance with Section 38A of the 2004 Act.

Excluded Development

3.9 The Plan does not include provisions and policies for "excluded development".

Human Rights

- 3.10 Long Stratton Town Council is satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998). From my independent assessment, I see no reason to disagree.
- 4. Compliance with the Basic Conditions

EU Obligations

- 4.1 The Neighbourhood Plan was screened for Strategic Environmental Assessment (SEA) by South Norfolk Council, which found that it was unnecessary to undertake SEA. Having read the Environmental Assessment Screening Opinion, 17 March 2020, I support this conclusion.
- 4.2 The Long Stratton Neighbourhood Plan was further screened for Habitats Regulations Assessment (HRA), which also was not triggered. The Neighbourhood Plan Area is not in close proximity to a European designated nature site. Natural England has not indicated that HRA would be required. From my independent assessment of this matter, I have no reason to disagree.

⁷ Consultation Statement, Paragraph 5.7.

Main Issues

- 4.3 Before I deal with the main issues, I have a few observations to make with regard to the representations. First, the Long Stratton Neighbourhood Plan should be seen in the context of the wider planning system. This includes the extant Local Plan as well as the NPPF and PPG. It is not necessary, and it would be inappropriate, to repeat in the Neighbourhood Plan matters that are quite adequately dealt with elsewhere.8
- 4.4 Secondly, the Neighbourhood Plan does not have to deal with each and every topic raised through the consultation. In this regard, the content of the Neighbourhood Plan and the scope of the policies are largely at the discretion of the qualifying body, albeit informed by the consultation process and the requirements set by the Basic Conditions.
- 4.5 Thirdly, my central task is to judge whether the Neighbourhood Plan satisfies the Basic Conditions. Many of the representations do not demonstrate or indicate a failure to meet those conditions or other legal requirements. Similarly, many of the suggested additions and improvements are not necessary when judged against the Basic Conditions.
- 4.6 The following section of my report sets out modification that are necessary in order to meet the Basic Conditions. Some of the proposed modifications are factual corrections. Others are necessary in order to have closer regard to national policies and advice. In particular, plans should contain policies that are clearly written and unambiguous. In addition, the policies should be supported by appropriate evidence.
- 4.7 Having regard for the Long Stratton Neighbourhood Plan, the consultation responses and other evidence, and the site visit, I consider that there are five main issues relating to the Basic Conditions for this examination. These concern:
 - Housing;
 - Design and Character;
 - Employment;
 - Outdoor Recreation, Green Infrastructure and Biodiversity; and
 - Community Facilities.

Issue 1: Housing

4.8 Policy SC1 deals with housing mix. However, I find the provisions a little confusing. There is reference to incorporating a mix that reflects the

⁸ See NPPF, Paragraph 16 f).

⁹ Modifications for the purpose of correcting errors is provided for in Paragraph 10(3)(e) of Schedule 4B to the 1990 Act.

¹⁰ NPPF, Paragraphs 15 and 16.

¹¹ PPG Reference: 41-041-20140306.

- evidence in an up-to-date housing needs assessment. The policy then continues to set out specific requirements. It is not clear whether the requirements are one and the same.
- 4.9 For clarity, the specific (current) requirements should be set out first. There should then be reference to the possible use of an alternative housing mix. This could arise out of a more up-to-date assessment or because the site context suggests a different mix.
- 4.10 Clear wording is set out in proposed modification PM1. The amendment also corrects an error in the wording. Additionally, and in reference to entry-level purchasers, the modification refers to "Appropriate regard" rather than "Specific regard". This is because an application could pay specific regard to the matter (provide comment) without achieving the desired outcome of including low-cost property. Similar comments apply to meeting the needs of older people through non-specialist housing (specialist housing is dealt with in Policy SC2).
- 4.11 Policy SC2 has the title "Specialist and Supported Housing". With regard to residential institutions, the policy states that *a proposal* (in the singular) will be supported. However, it was not the intention to restrict support to a single proposal.¹³ A correction would be effected under proposed modification PM2. Proposed modification PM2 also deals with a small point of consistency in the grammar of the policy.
- 4.12 Policy SC3 addresses affordable housing. There is a provision for "A proportion" of affordable housing to be prioritised for residents with a close local connection. Whilst I understand the reasons for not specifying an actual proportion, 14 the requirement could be met through any proportion of affordable housing. This is unlikely to meet the desired outcome. Under proposed modification PM3, reference would be made to a meaningful proportion. This would enable the District Council to seek a proportion based on the circumstances of the particular case.
- 4.13 Proposed modification PM3 would also add clarity in circumstances where applicants are expected to refer to "any other up to date information" on affordable housing need. Specific reference to the Long Stratton Demographic and Socio-Economic review would be added.
- 4.14 With proposed modifications PM1 to PM3 in place, the housing ("strong community") policies would pay appropriate regard to national policy and accuracy and meet the Basic Conditions.

¹² See Paragraph **3.1 of the Town Council response to the Examiner's que**stions.

¹³ See Paragraph **6.1** of the Town Council response to the Examiner's questions.

¹⁴ See Paragraphs **8.1 to 8.4 of the Town Council response to the Examiner's questions.**Intelligent Plans and Examinations (IPE) Ltd, 3 Princes Street, Bath BA1 1HL

Issue 2: Design and Character

- 4.15 Policy DC7 concerns landscape and settlement character. Amongst other things, the policy states that "key features of the ancient countryside will be protected". However, for the applicant, the policy does not indicate what are the key features to which regard must be paid.
- 4.16 The Town Council's response to my questions indicates that the principal reference is Norfolk County Council's Historic Characterisation and Sensitivity Assessment as applied to Long Stratton East Sensitivity Zone (Map 1 in the draft Plan). For clarity, reference to this document would be added through proposed modification PM4.
- 4.17 Policy DC8 (Creating successful neighbourhoods) makes reference to a "Building for Life 12 assessment". Building for Life 12 has now been replaced by "Building for a Healthy Life". As such, an up-dated reference would be appropriate. Proposed modification PM5 refers.
- 4.18 Under Policy DC9, "opportunities to address issues at individual listed buildings and buildings of townscape significance will be sought".

 However, the policy does not indicate what those issues might be. Such issues are highlighted in the Long Stratton Conservation Area Character Appraisal and would be identified through proposed modification PM6.
- 4.19 Policy DC10 (Long Stratton Design Principles) contains two references that require clarification. The first is reference to "Passivhaus standards" (what these are and where they are to be found). The second is to "an area-wide design code" connected to Long Stratton's strategic site allocation. For clarity, more precise information would be provided through proposed modification PM7.
- 4.20 In respect of the design and character policies, proposed modifications PM4 to PM7 would have regard to national policy and ensure accuracy, contribute to the achievement of sustainable development, and the Basic Conditions would be met.

Issue 3: Employment

- 4.21 Policy E12 (Training Long Stratton's local workforce) seeks investment in local training or apprentice schemes by larger employers "where necessary to secure a strong and sustainable economy". However, it will be difficult for a decision maker to interpret this phrase and to apply it consistently and with confidence.¹⁵
- 4.22 It is likely that most schemes creating a high number of job opportunities will benefit the local economy and investment in local training or apprenticeship schemes would be justified. This should be assumed for the purposes of the policy. Exceptions could be recognised in the policy

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¹⁵ See PPG Reference ID: 041-20140306.

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wording, for example when the test regarding planning obligations would not be fulfilled. Proposed modification PM8 sets out a revised form of wording that would have regard to national policy and meet the remaining Basic Conditions.

Issue 4: Outdoor Recreation, Green Infrastructure and Biodiversity

- 4.23 Policy GI17 (Delivering green infrastructure in Long Sutton) opens with the phrase "Where green infrastructure is required". However, there is no clarity over what is required and under what provisions. Reference to the Town Council's answers to my questions indicates that this relates to green infrastructure that is required as part of Local Plan provisions including Policy LNGS5 and Appendix 3 of the Long Stratton AAP. Amendment under proposed modification PM9 would ensure that the policy is clearly written and unambiguous in line with national guidance.
- 4.24 Policy GI19 has the title "Protecting existing sites of biodiversity value in the plan area". I have considered whether there is general conformity with strategic policies in the Long Stratton AAP, May 2016, specifically Policy LNGS5 (General Green Infrastructure Requirements for New Developments within Long Stratton AAP Area).
- 4.25 The AAP indicates that all new developments (which would include a link road) should deliver a net biodiversity gain. The equivalent provision in Policy GI19 of the draft Neighbourhood Plan states that "development proposals will be expected to deliver net gains in biodiversity". I see no lack of general conformity in this regard.

Issue 5: Community Facilities

- 4.26 Map 8, as referred to in Policy R20 (Delivering a new community meeting space in Long Stratton), identifies the Town Council's preferred location for a new community centre in Long Stratton. Representations¹⁷ indicate that, under revised proposals, provision for a community space is now made elsewhere. Amendment of the text is necessary to recognise this point (proposed modification PM10). However, the position in the draft Neighbourhood Plan remains as stated in the policy.
- 4.27 Finally, Policy R21 encourages provision of a swimming pool. The policy as drafted is aspirational. It would be difficult to apply in the determination of planning applications. Due regard to national guidance would be met through proposed modification PM11, which would indicate that a proposal for a swimming pool would be supported.

¹⁶ See NPPF, Paragraph 56.

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¹⁷ See Regulation 16 representations of Norfolk Homes Ltd.

Other Policies

- 4.28 Various policies have not been the subject of discussion in the above report. These concern community integration (Policies SC4, 5 and 6), employment (Policy E11), town centre matters (Policies TC13, 14 and 15), open space (Policy GI16), green infrastructure (Policy GI18) and broadband provision (Policy C22).
- 4.29 To a greater or lesser extent, these topics are covered in the NPPF (Section 6 Building a strong, competitive economy; Section 7 Ensuring the vitality of town centres; Section 8 Promoting healthy and safe communities; Section 9 Promoting sustainable transport; Section 10 Supporting high quality communications; and Section 15 Conserving and enhancing the natural environment). I find that there has been regard to this national policy and the Basic Conditions have been met.

Conclusions on the Main Issues

4.30 With the modifications that I have recommended, the Plan would meet the Basic Conditions. Other minor (non-material) changes, including suggestions and corrections set out in the representations, can be incorporated into the final version of the Plan.

5. Conclusions

Summary

- 5.1 The Long Stratton Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard for all the responses made following consultation on the Neighbourhood Plan and the evidence documents submitted with it.
- I have made recommendations to modify a number of policies and text to ensure the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Long Stratton Neighbourhood Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary, requiring the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Overview

5.4 It is evident that a considerable amount of time and effort has been devoted to the development and production of this Plan and I congratulate those who have been involved. The Plan should prove to be a useful tool for future planning and change in Long Stratton over the coming years.

Andrew S Freeman

Examiner

Appendix: Modifications

Proposed modification number	Page no./ other reference	Modification
(PM)	rererence	
PM1	Page 40	Substitute the following for the text of Policy SC1:
		"Major residential development proposals (10 dwellings or more) will be supported where they incorporate a significant proportion (circa 70 percent) of two and three bedroom dwellings. Appropriate regard shall also be had to meeting the needs of 1) entry level purchasers on low and medium incomes for example by including flats and terraced housing; and 2) older people through accessible, adaptable general needs housing.
		An alternative housing mix must be justified by 1) an up-to-date assessment of existing needs applicable to Long Stratton; or 2) the site-specific context."
PM2	Page 44	In Policy SC2, under the "Specialist housing" heading, insert "they" at the start of the third bullet point.
		Under "Residential institutions", substitute "Proposals" for "A proposal".
PM3	Page 45	In Policy SC3, add "meaningful" before "proportion".
		Substitute "relevant information including the Long Stratton Demographic and Socio-Economic review and the strategic housing market assessment" for "up to date information (e.g. the strategic housing market assessment)".
PM4	Page 54	In the second bullet point of Policy DC7, after "settlement boundaries", insert "(Map 1 – East Sensitivity Zone)".
		After "ancient countryside", insert "as identified in Norfolk County Council's Historic

Proposed modification number (PM)	Page no./ other reference	Modification
		Characterisation and Sensitivity Assessment".
PM5	Page 57	In Policy DC8, replace "Building for Life 12 assessment (as updated or equivalent)" with "Building for a Healthy Life Assessment".
		Edit the supporting text accordingly.
PM6	Page 58	In relation to Policy DC9, add the following to Footnote 15: "Current issues where attention should be focussed are highlighted on Page 15."
PM7	Page 62	In Policy DC10, after "Passivhaus standards", insert a footnote: https://www.passivhaustrust.org.uk/ Delete all text after and including "an areawide design code" and replace with "the Long Stratton Design Code (or any accepted replacement) as agreed by South Norfolk Council in connection with the planning permission for the site."
PM8	Page 66	Substitute the following for the second paragraph of Policy E12: "Where relevant and appropriate, development proposals which are anticipated to create a high number of job opportunities will be required, via a S106 planning obligation, to invest in local training and/or apprenticeship schemes."
PM9	Page 81	In the opening of Policy GI17, insert "under Local Plan provisions" before "Green Infrastructure".
PM10	Page 88	In Paragraph 5.6.31, replace the wording after "Star Lane" with the following: "which was part of the proposal as submitted in a planning application by Norfolk Homes Ltd in 2018".

Proposed	Page no./	Modification
modification	other	
number	reference	
(PM)		
PM11	Page 93	For the words "is strongly encouraged" in Policy R21, substitute "would be supported".

Appendix 2

Long Stratton Neighbourhood Plan – South Norfolk Council Reg. 16 representations and examiner responses

Section of NP	Representation	Examiner Response	SNC Officer Commentary
Policy E12 - Training	Following its comment during the Regulation	Policy E12 (Training Long Stratton's local	The Inspector has not considered it
Long Stratton's local	14 consultation stage, and despite being	workforce) seeks investment in local	necessary to add in the additional
workforce	supportive of the policy intent, South	training or apprentice schemes by larger	detail requested by the Council in
	Norfolk Council remains concerned as to	employers "where necessary to secure a	order for the plan to meet the basic
	how and when this policy could be applied.	strong and sustainable economy".	conditions.
		However, it will be difficult for a decision	
	In particular, the Council feels that greater	maker to interpret this phrase and to	Whilst this means that the Council will
	clarity is required, in terms of the operation	apply it consistently and with confidence.	needs to exercise its planning
	of the policy, the circumstances in which it		judgement in respect of the
	would apply, the likely level of contribution	It is likely that most schemes creating a	implementation of the policy,
	required, and how impacts on viability have	high number of job opportunities will	contributions will be secured via S106
	been considered.	benefit the local economy and	agreement. Section 122 of the
		investment in local training or	Community Infrastructure Levy
		apprenticeship schemes would be	Regulations 2010 sets out the
		justified. This should be assumed for the	statutory limitations on the use of
		purposes of the policy. Exceptions could	planning obligations. As referred to by
		be recognised in the policy wording, for	the inspector, this will provide a basis
		example when the test regarding	to judge when and where
		planning obligations would not be	contributions could justifiably be
		fulfilled. ¹ Proposed modification PM8	sought.
		sets out a revised form of wording that	
		would have regard to national policy and	On this basis, it is considered
		meet the remaining Basic Conditions.	acceptable to progress the
			Neighbourhood Plan in line with the
		Modification PM8:	Inspector's recommendations.

¹ See NPPF, Paragraph 56.

Protecting existing sites of biodiversity value in the plan area	"The Council is concerned that this policy is in conflict with the adopted Long Stratton Area Action Plan, in that the Neighbourhood Plan policy expects net gains in biodiversity at the site level from development proposals, as opposed to an overall net gain (as expressed in AAP Policy LNGS5).	Substitute the following for the second paragraph of Policy E12: "Where relevant and appropriate, development proposals which are anticipated to create a high number of job opportunities will be required, via a S106 planning obligation, to invest in local training and/or apprenticeship schemes." I have considered whether there is general conformity with strategic policies in the Long Stratton AAP, May 2016, specifically Policy LNGS5 (General Green Infrastructure Requirements for New Developments within Long Stratton AAP Area). The AAP indicates that all new developments (which would include a link road) should deliver a net biodiversity gain. The equivalent provision in Policy GI19 of the draft Neighbourhood Plan states that "development proposals will be expected to deliver net gains in biodiversity". I see no lack of general conformity in this regard.	The examiner has considered the Council's concerns, concluding that there is no lack of general conformity between the AAP and the Neighbourhood Plan Policy. General conformity is a matter of planning judgement but typically necessitates upholding the general principle of the overarching strategic policies. With the comfort of the Inspectors judgement on matters of general conformity, Officers consider that there are unlikely to be significant issues in bringing forward
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			On this basis, it is considered
			acceptable to progress the
			Neighbourhood Plan in line with the
			Inspector's recommendations.
Policy R20 -	The Council feels it would be useful if the	Map 8, as referred to in Policy R20	The Inspector has not explicitly
Delivering a new	policy could give some further clarity on the	(Delivering a new community meeting	addressed the Council's
community meeting	types and scale of development from which	space in Long Stratton), identifies the	representation in his report. However,
space in Long	contributions might be sought (i.e. does the	Town Council's preferred location for a	it can be reasonably deemed that he
Stratton	obligation apply to all development or just	new community centre in Long Stratton.	has concluded further detail is not
	major development, as defined within	Representations ² indicate that, under	needed in order for the plan to meet
	planning legislation?), the level of	revised proposals, provision for a	the basic conditions.
	contribution that might be required in	community space is now made	
	different circumstances, and any	elsewhere. Amendment of the text is	Nonetheless, on the basis of the policy
	consideration that may have been given to	necessary to recognise this point	as drafted there remains uncertainty
	viability. Any further information of this sort	(proposed modification PM10).	around the level of contributions that
	that could be provided to assist the decision	However, the position in the draft	would be sought. This will require the
	maker in interpreting and applying the policy	Neighbourhood Plan remains as stated in	Council to exercise its planning
	would be considered valuable.	the policy.	judgement in respect of the
			implementation of the policy
		Modification PM10:	
		In Paragraph 5.6.31, replace the wording	Nonetheless, as with Policy E12,
		after "Star Lane" with the following:	contributions will be secured via S106
		"which was part of the proposal as	agreement. Section 122 of the
		submitted in a planning application by	Community Infrastructure Levy
		Norfolk Homes Ltd in 2018".	Regulations 2010 sets out the
			statutory limitations on the use of
			planning obligations. This will provide
			a basis to judge when and where
			contributions could justifiably be
			sought.

² See Regulation 16 representations of Norfolk Homes Ltd.

			On this basis, it is considered acceptable to progress the Neighbourhood Plan in line with the Inspector's recommendations
Policy R21 - A new swimming pool for a larger community	The Council is aware of the significant amount of community support that sits behind this policy, as well as the work that has gone into providing a positively-worded statement that reflects this aspiration, but which also takes account of the need for further detailed evidence. However, there is a concern that, as the decision maker, it would be difficult for the Council to apply this policy in the determination of applications. Consequently, it may be worth considering changing this from a policy to a 'project' or 'community aspiration'.	The policy as drafted is aspirational. It would be difficult to apply in the determination of planning applications. Due regard to national guidance would be met through proposed modification PM11, which would indicate that a proposal for a swimming pool would be supported. Modification PM11: For the words "is strongly encouraged" in Policy R21, substitute "would be supported".	The inspector has not recommended this policy become a project, as per the Council's representation and the circumstances in which contribution will be sought and the level of those contributions remain uncertain. However, as with policies referred to elsewhere, contributions will be secured via \$106 agreement. Section 122 of the Community Infrastructure Levy Regulations 2010 sets out the statutory limitations on the use of planning obligations. This will provide a basis to judge when and where contributions could justifiably be sought. Again therefore, on this basis, it is considered acceptable to progress the Neighbourhood Plan in line with the Inspector's recommendations



South Norfolk Council

Long Stratton Neighbourhood Plan - Decision Statement

1. Summary

Following an independent examination, South Norfolk Council has received the examiner's report relating to the Long Stratton Neighbourhood Plan. The report makes a number of recommendations for making modifications to policies within the Neighbourhood Plan. South Norfolk Council has made a decision to approve each of the examiner's recommendations and to allow the Neighbourhood Plan to proceed to a referendum within the neighbourhood area.

2. Background

Following the submission of the Long Stratton Neighbourhood Plan to South Norfolk Council in January 2021, the Neighbourhood Plan was published in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 and representations invited. The publication period took place between 22nd March and 6th May 2021.

The local planning authority, with the approval of Long Stratton Town Council, subsequently appointed an independent examiner, Mr Andrew Freeman, to conduct an examination of the submitted Neighbourhood Plan and conclude as to 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 concludes that, subject to making certain recommended modifications, the Neighbourhood Plan meets the basic conditions for neighbourhood planning and should proceed to a Neighbourhood Planning referendum within the adopted neighbourhood area.

3. Decision

Having considered each of the recommendations in the examiner's report and the reasons for them, South Norfolk Council has decided to approve each of the examiner's recommended modifications. This is in accordance with section 12 of Schedule 4B to the Town and Country Planning Act 1990. The Council considers this decision will ensure that the Neighbourhood Plan meets the basic conditions.

The following table sets out the examiner's recommended modifications, the Council's consideration of those recommendations, and the Council's decision in relation to each recommendation.

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 SC1 – Housing Mix	Substitute the following for the text of Policy SC1: "Major residential development proposals (10 dwellings or more) will be supported where they incorporate a significant proportion (circa 70 percent) of two and three bedroom dwellings. Appropriate regard shall also be had to meeting the needs of 1) entry level purchasers on low and medium incomes for example by including flats and terraced housing; and 2) older people through accessible, adaptable general needs housing. An alternative housing mix must be justified by 1) an up-to-date assessment of existing needs applicable to Long Stratton; or 2) the site-specific context."	The Council agrees with the examiner that the original policy wording was unclear in terms of its requirements for providing a suitable mix of housing.	Accept examiner's recommended modification.
Policy SC2 – Specialist and Supported Housing	In Policy SC2, under the "Specialist housing" heading, insert "they" at the start of the third bullet point. Under "Residential institutions", substitute "Proposals" for "A proposal".	The Council agrees that the recommended modification will clarify the intention to not simply support one residential institution.	Accept examiner's recommended modification.
Policy SC3 – Affordable homes meeting Long Stratton needs	In Policy SC3, add "meaningful" before "proportion". Substitute "relevant information including the Long Stratton Demographic and Socio-Economic review and the strategic housing market assessment" for "up to date information (e.g. the strategic housing market assessment)".	The Council agrees that the recommended modification would provide further clarity to the policy.	Accept examiner's recommended modification.

Policy DC7 – Landscape and settlement character	In the second bullet point of Policy DC7, after "settlement boundaries", insert "(Map 1 – East Sensitivity Zone)". After "ancient countryside", insert "as identified in Norfolk County Council's Historic Characterisation and Sensitivity Assessment".	The Council agrees that the recommended modification would provide further clarity to the policy.	Accept examiner's recommended modification.
Policy DC8 – Creating successful neighbourhoods	In Policy DC8, replace "Building for Life 12 assessment (as updated or equivalent)" with "Building for a Healthy Life Assessment". Edit the supporting text accordingly.	The Council agrees that the reference should be updated to reflect the current guidance.	Accept examiner's recommended modification.
Policy DC9 – Strengthening and enhancing Long Stratton's historic core	In relation to Policy DC9, add the following to Footnote 15: "Current issues where attention should be focussed are highlighted on Page 15."	The Council agrees that this modification would provide added clarity as regards this policy.	Accept examiner's recommended modification.
Policy DC10 – Long Stratton Design Principles	In Policy DC10, after "Passivhaus standards", insert a footnote: https://www.passivhaustrust.org.uk/ Delete all text after and including "an area-wide design code" and replace with "the Long Stratton Design Code (or any accepted replacement) as agreed by South Norfolk Council in connection with the planning permission for the site."	The Council agrees that the modified wording would provide added clarity to this policy.	Accept examiner's recommended modification.
Policy E12 – Training Long Stratton's local workforce	Substitute the following for the second paragraph of Policy E12: "Where relevant and appropriate, development proposals which are anticipated to create a high number of job opportunities will be required, via a S106 planning obligation, to invest in local training and/or apprenticeship schemes."	The Council agrees that this modification would provide added clarity as regards this policy.	Accept examiner's recommended modification.

Policy R20 – Delivering a new community meeting space in Long Stratton	In Paragraph 5.6.31, replace the wording after "Star Lane" with the following: "which was part of the proposal as submitted in a planning application by Norfolk Homes Ltd in 2018".	The Council agrees that the modified supporting text will help to provide further context and clarification.	Accept examiner's recommended modification.
Policy R21 – A new swimming pool for a larger community	For the words "is strongly encouraged" in Policy R21, substitute "would be supported"	The Council agrees that the modification will better reflect the aspirational nature of this policy.	Accept examiner's recommended modification.

4. Next Steps

This Decision Statement and the examiner's report into the Long Stratton Neighbourhood Plan will be made available at:

- www.southnorfolkandbroadland.gov.uk
- South Norfolk Council offices South Norfolk House, Cygnet Court, Long Stratton, Norwich, NR15 2XE (normal opening times: 8:15am to 5pm Monday to Friday. Closed weekends and Bank Holidays)

N.B the offices are open forpre-booked appointments only

If you wish to make an appointment to view the documents, please contact the Place Shaping Team on (01508) 533805

South Norfolk Council is satisfied that with the modifications it has approved, as detailed above, the Long Stratton Neighbourhood Plan should proceed to a referendum within the neighbourhood area, in which the following question will be posed:

'Do you want South Norfolk Council to use the Neighbourhood Plan for Long Stratton 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.



Agenda Item:7
Cabinet
19 July 2021

Adoption of Conservation Area Appraisals and Boundary Amendments for Burston, Forncett, Gissing, Thorpe Abbotts, Winfarthing and Wramplingham Conservation Areas

Report Author(s): Chris Bennett

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Portfolio: Stronger Economy

Ward(s) Affected: Bressingham & Burston, Beck Vale, Dickleburgh & Scole,

Forncett and Wicklewood

Purpose of the Report:

The purpose of this report is for Cabinet to recommend to Council approval and adoption of amended conservation area boundaries, and conservation area appraisals and management guidelines.

Recommendations:

- 1. To recommend that Council approves and adopts the amended conservation area boundaries for Burston, Forncett, Gissing, Thorpe Abbotts, Winfarthing and Wramplingham Conservation Areas.
- To recommend that Council approves and adopts the conservation areas of Burston, Forncett, Gissing, Thorpe Abbotts, Winfarthing and Wramplingham Conservation Areas

1. Summary

1.1 The report seeks the recommendation to Cabinet and Council for the approval and adoption of revised conservation area boundaries, appraisals and management guidelines for the Conservation Areas of Burston, Forncett, Gissing, Thorpe Abbotts, Winfarthing and Wramplingham conservation areas subject to any revisions following public consultation.

2. Background

- 2.1 Under the section 69 of Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is required from time to time to determine which part of their areas are of special architectural or historic interest whose character or appearance it is desirable to preserve or enhance, and to designate them as conservation areas. Under Section 71 of the Act the authority is also required to formulate and publish proposals for their preservation and enhancement.
- 2.2 The council currently has 52 conservation areas. The current programme of conservation area appraisals being undertaken is the first comprehensive review of the conservation areas since their original designations, in some cases dating back to the mid-1970s. During this period development has led to a change in the character and appearance of the conservation areas and there has also been a change in opinion as to what heritage may be considered worthy of preservation.
- 2.3 The rolling programme of reviewing conservation areas has given priority to those areas where the character and appearance is considered to be at greatest threat from change. The appraisals previously adopted are: Brockdish (2018) Bramerton (1975) Diss (2012) Trowse with Newton (2012) Wymondham (2012) Long Stratton (2013) Stoke Holy Cross (2013) Cringleford (2014) Harleston (2016) Hingham (2016) Loddon & Chedgrave (2016) Bawburgh (2017) Dickleburgh (2017) Hempnall (2017) Mulbarton (2017) Saxlingham Green (2018) Saxlingham Nethergate (2018) Scole (2018) Shotesham (2018), Fritton (2019), Pulham Market (2019), Pulham St. Mary (2019), Seething (2019), Starston (2019) and Wacton (2019). In addition, appraisals prepared by the Broads Authority and adopted include Ditchingham Dam (2013), Ellingham (2013), Geldeston (2013) and Langley Abbey (2014).
- 2.4 The appraisals have been carried following guidance in the Historic England Conservation Area Designation, Appraisal and Management Historic England Advice Note 1 v 3.0 Feb 2019.
- 2.5 The appraisals and proposed boundary revisions were taken to the Regulation and Planning Policy Committee on 9 April 2021 who recommended to Cabinet and Council the approval of the revised boundaries, conservation area appraisals and the conservation management guidelines.

3. Current position/findings

- 3.1 The conservation area boundaries have not been amended for these conservation areas since the original designations in 1994. In order to be effective in assisting in making planning determinations and making informed decisions it is important that the conservation area boundary and the appraisals content is up-to-date.
- 3.2 Th e appraisals assess the character and appearance of the conservation area and recommend either extending or removing peripheral areas by changing the boundary line depending on whether the areas make a positive, negative or neutral contribution to the conservation area. Conservation management guidelines are included which set out proposals as to how the conservation areas can be managed and further enhanced.
- 3.3 Consultation on the appraisals was undertaken from 15th February to 15th March. The process, comments and responses are summarised in Appendix C.

4. Proposals

4.1 The maps at Appendix A show the proposed revised conservation area boundaries with the areas to be included and the areas to be excluded, with amendments following consultation. Appendix B shows the new conservation area boundaries to be approved. A full consultation response is contained at appendix C, however the main changes proposed and altered following consultation are as follows:

Burston

No amendments to suggest boundary changes. An additional conservation management guideline is included to cover parking on the verges in the newly extended area along Audley End. This suggests finding suitable alternative parking or designing he verge so that cars do not damage them (e.g. plastic mesh netting.)

Forncett

The extension to the school area to only include buildings and playground. The new boundary for Street Farm has been retained as it coincides with the line of a roadside ditch rather than across the field on a random line.

Several comments to extend the conservation to include additional buildings, however these are scattered and interspersed with modern buildings so do not form an area of sufficient architectural or heritage interest to warrant inclusion in the conservation area.

Gissing

No suggested revisions to the proposed amended boundary. Mention of including the Malthouse Farm along Malthouse Lane at parish council meeting. This is an architecturally and historically important listed building along Malthouse Lane, but too far along the lane and remote from the village to be considered for inclusion in the conservation area.

Thorpe Abbotts

There is an issue with verge damage from vehicles – kerbs suggested. However, this would not be so sympathetic to rural character so other solutions such as timber bollards are promoted in the appraisal. Parish council suggested including school lane buildings and county wildlife site. School Lane cottages are some distance from the rest of the village and it is not considered to justify extending out the area. Areas are designed for architectural and historic significance rather than natural conservation importance – so wildlife areas not included unless important part of village character in terms of street views for example.

Winfarthing

The extension of boundary to Holly Barn is no longer included following representations. As a fruit orchard it does not add significant value in terms of a potential contribution to the area. Boundary extension adapted to the school following representations to only include buildings and play area. Following representation from Woodsfield the proposed boundary extension is drawn along the former curtilage line to include some street frontage. Other parts are either fields or were former fields only relatively recently included within the property's curtilage, and according to the owner poorly planted.

Wramplingham

No boundary changes were recommended. Some comments on design of railings as safety issue and telephone box as key feature. Text to be amended accordingly.

Appendix D contains the appraisals to be approved.

5. Issues and Risks

- 5.1 Inclusion in the conservation area will result in the following changes to those properties to be included:
 - Any submission for planning permission will be considered with regard to preserving and enhancing the character and appearance of the conservation area.
 - Planning permission will be needed to demolish buildings and other structures such as front garden walls (if over 1m in height)

- Alterations affecting external appearance, particularly to the front elevation are likely to require planning permission e.g. dormer windows and satellite dishes
- Six weeks notice is required to be given to the council prior to undertaking any works to trees.
- 5.2 Removing areas from the conservation areas will result in some deregulation for owners of those properties. However, the removed areas will be subject to design policies Joint Core Strategy and the Local Plan, and guidance on design such as the South Norfolk Place Making Guide. A high standard of design will still be sought when considering planning applications.
- 5.3 It is important to note that the setting of the conservation area is a material consideration. Any development outside the conservation area but still deemed to affect the setting will be considered on its relative merits on that basis.
- 5.4 The character assessment in the appraisals will provide improved background information on defining the character and appearance of the conservation areas, and this in turn will lead to an improvement in design and access statements and assist in decision making when determining planning applications.
- 5.5 The conservation management guidelines are written to support and develop good practice in managing and enhancing the conservation areas.

6. Conclusion

6.1 The appraisal of the conservation areas and the review of the boundaries will provide up-to-date information on the conservation areas when making planning decisions. The management guidelines assist in identifying areas where there is potential for enhancement.

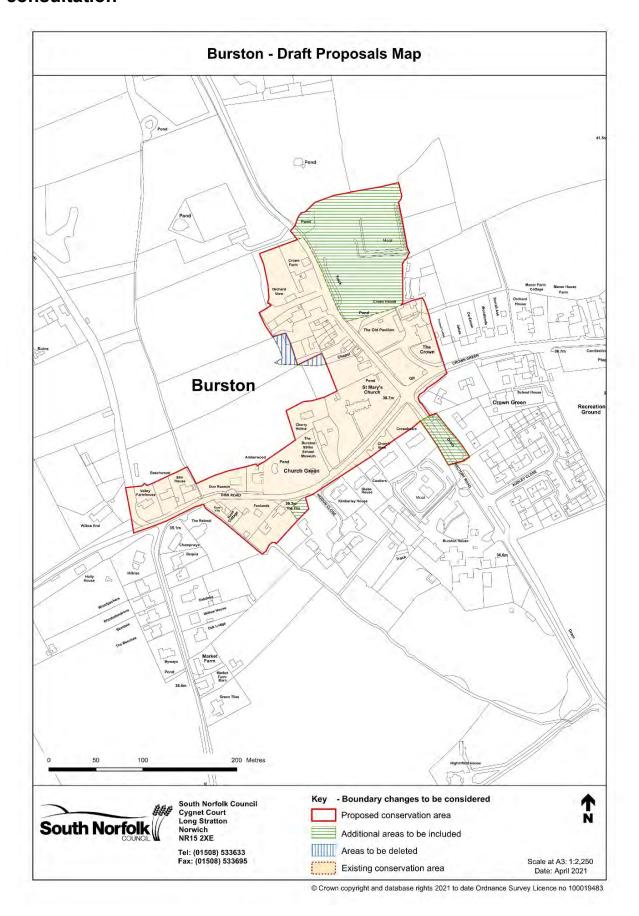
7. Recommendation

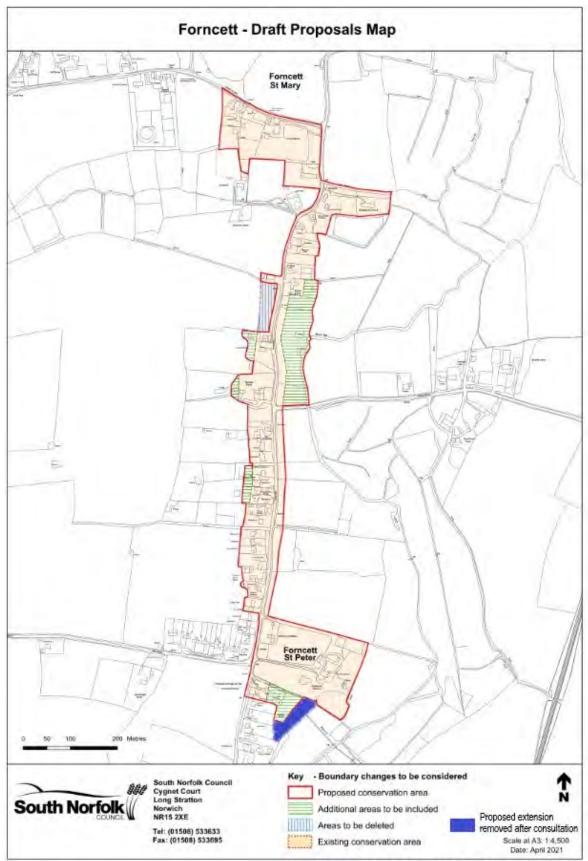
- 7.1 Cabinet to recommend to Full Council the approval and adoption of the proposed changes to the boundaries of Burston, Forncett, Gissing, Thorpe Abbotts Winfarthing and Wramplingham Conservation Areas.
- 7.2 Cabinet to recommend to Full Council the approval and adoption of the conservation area appraisals and conservation management guidelines for the conservation areas of Burston, Forncett, Gissing, Thorpe Abbotts, Winfarthing and Wramplingham Conservation Areas.

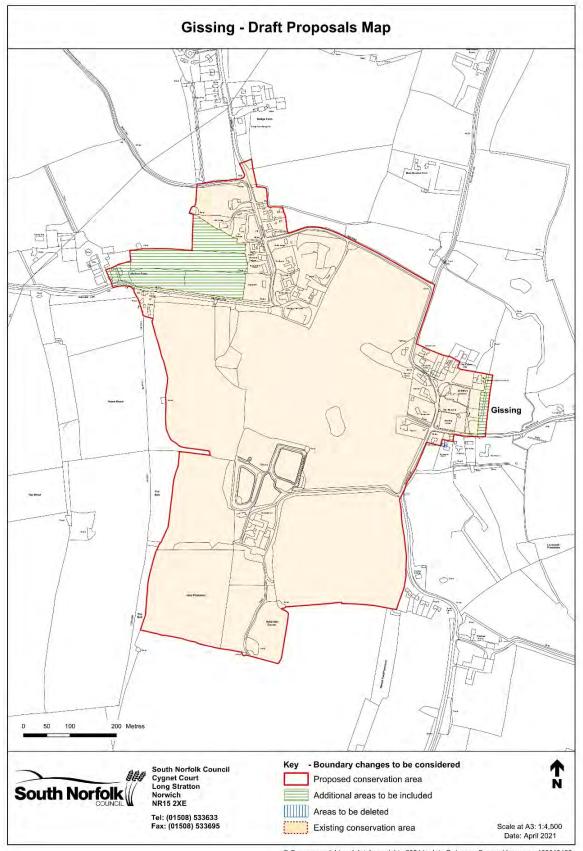
Background papers

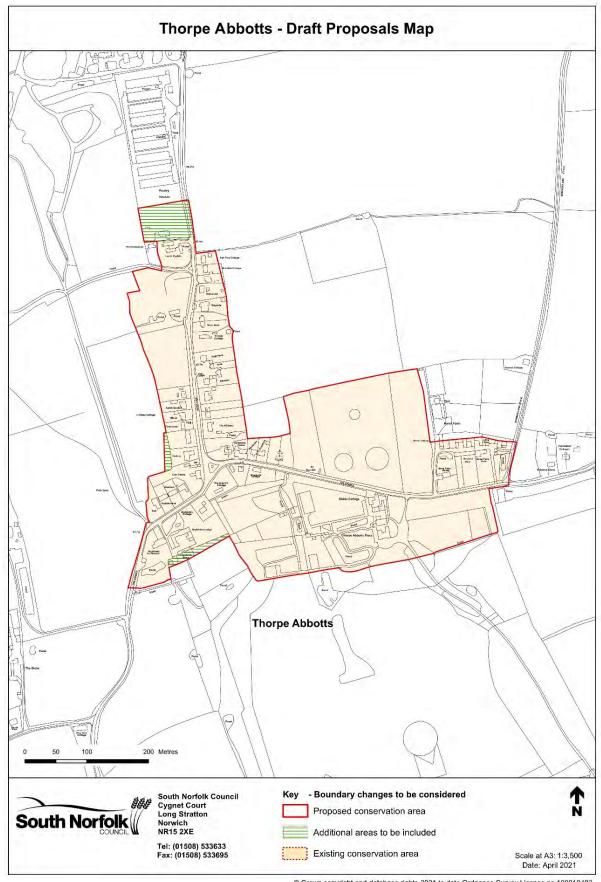
- Appendix A: Maps indicating the proposed revised conservation area boundaries with the areas to be included and excluded
- Appendix B: Maps showing the new conservation area boundaries to be approved and adopted (indicated by a red line)
- Appendix C: Summary of Consultation Responses
- Appendix D: Conservation Area Appraisals to be adopted for Burston, Forncett, Gissing, Thorpe Abbottss, Winfarthing and Wramplingham Conservation Areas.

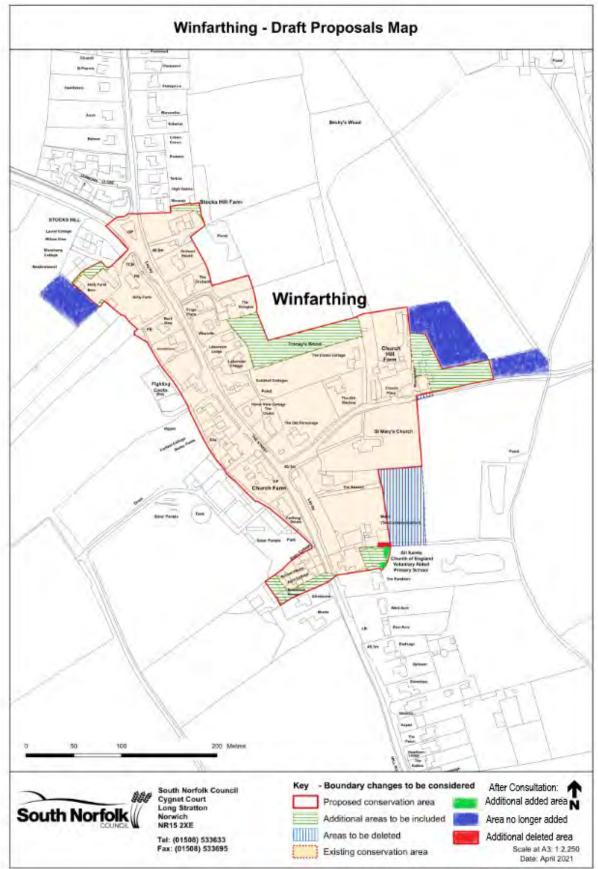
Appendix A - Maps showing Final amendments following consultation

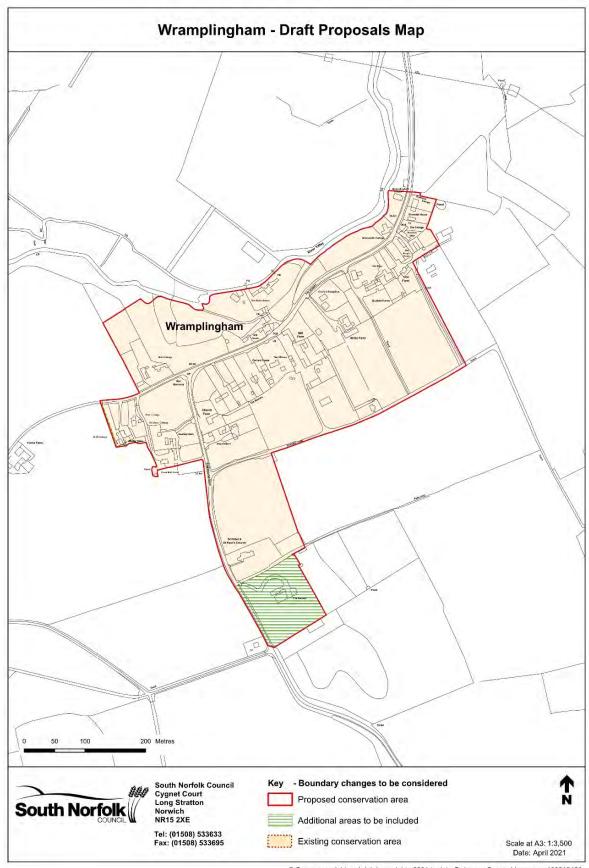




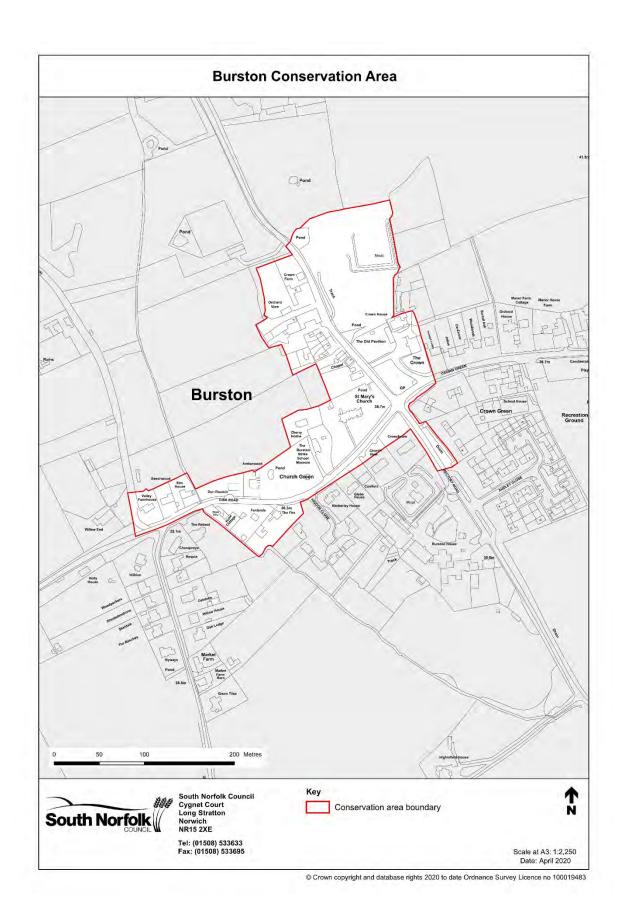


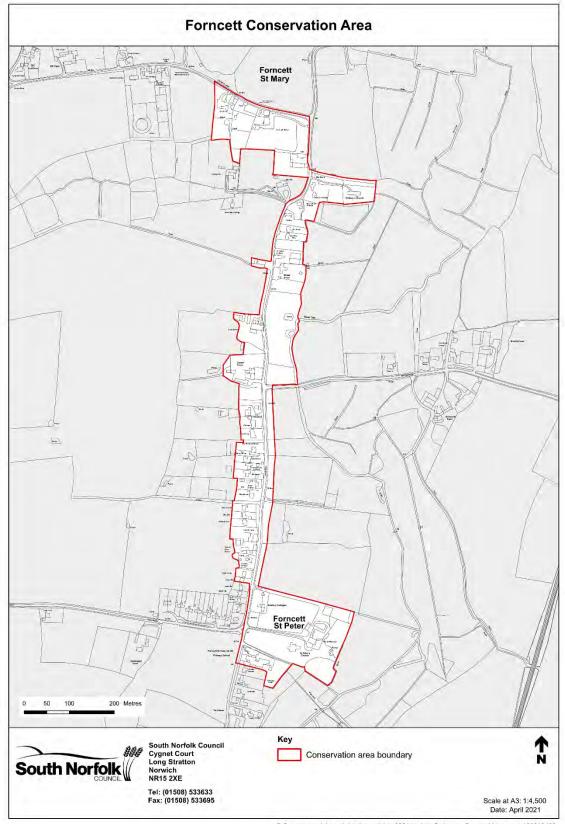


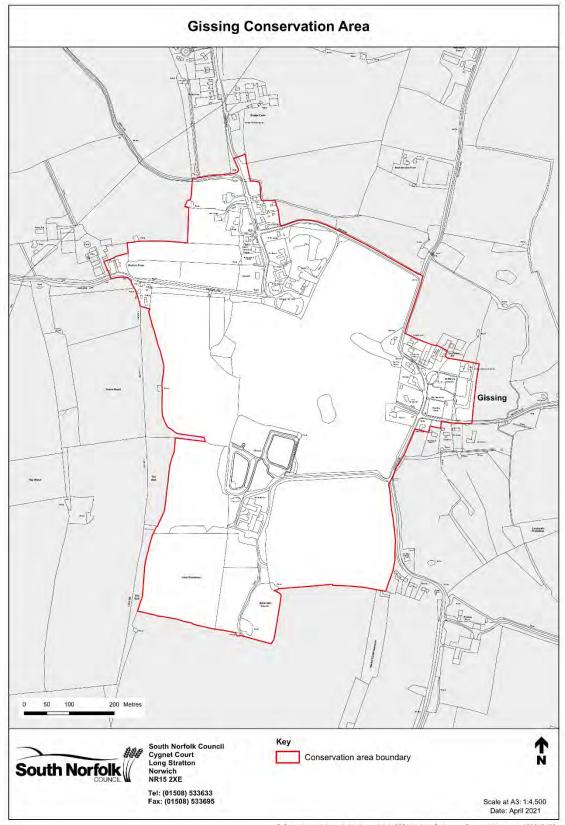


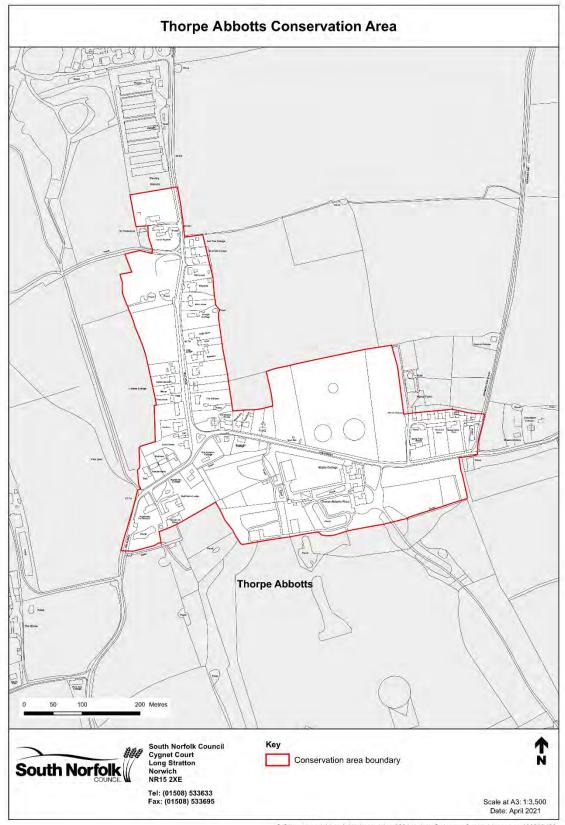


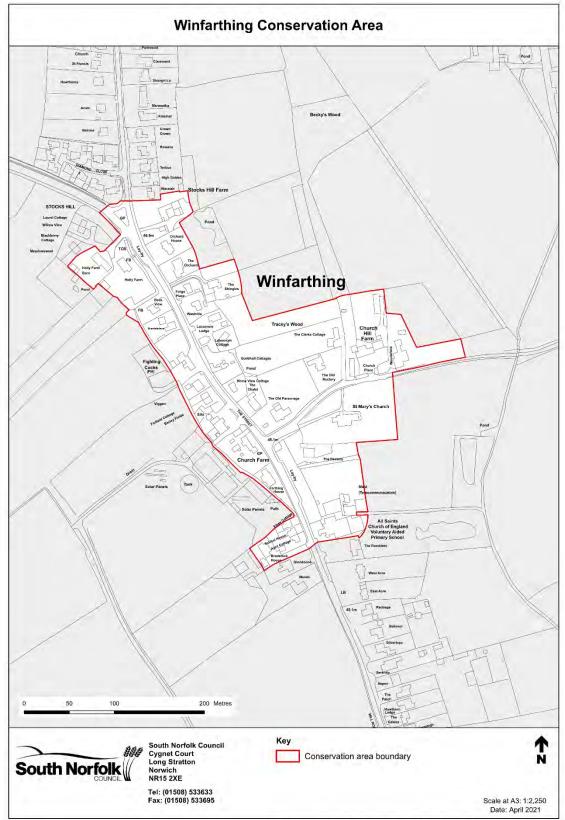
Appendix B: Maps showing the new conservation area boundaries to be approved and adopted (indicated by a red line)

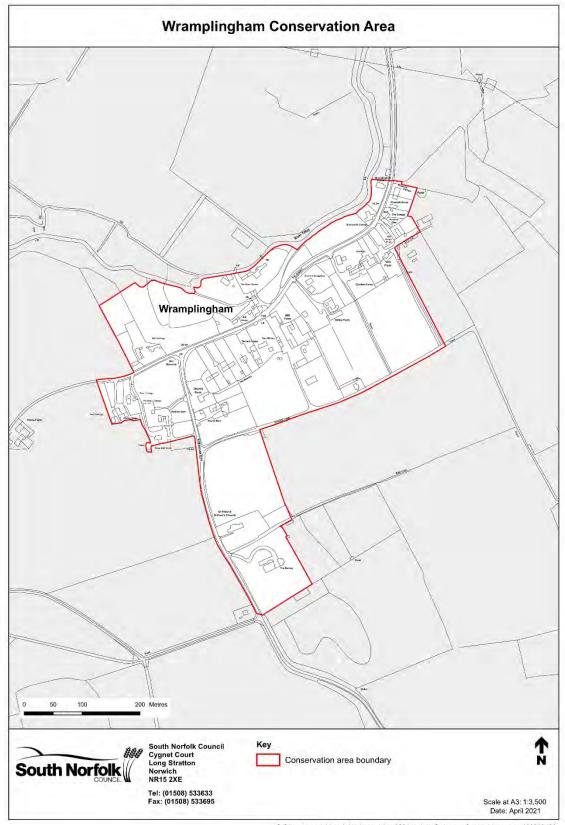












Appendix C

Consultation responses

Consultation process

Informal 'walkabouts' of the conservation areas took place as part of the process of reviewing the existing boundaries and proposing any boundary changes. This was formed of small groups of local councillors (district and parish).

The statutory consultation on the prepared appraisal drafts, which included recommended boundary changes and conservation management guidelines, took place from February 15th February until March 15th. The following process took place:

- Residents directly affected by the proposed boundary changes were contacted by letter.
- Emails were sent to Ward Councillors, County Councillors, the Parish Councils, and Historic England.
- Adverts were placed at local information points such as village noticeboards.
- The appraisals were available to view on the council's website.
- Presentations were made to each Parish Council via Zoom to which members of the public were invited to attend. (This meets the requirement of holding a public exhibition.) The parish meeting for Burston was held on 16th March.

Comments received and responses:

Burston:

Comment	Response
Burston Parish Council commented Crown Green car park not village car park but pub car park. Some historical factual and place name corrections to text pointed out including Burston Rally being in September and not May.	Noted. Corrections have been made following input.
Parish meeting it was pointed out that there is damage to the roadside verges resulting from parked cars. It was discussed that there was limited parking opportunities but that it may be beneficial to find a parking solution or surface treatment such as plastic grasscrete to avoid unsightly damage.	Agreed. An additional conservation management plan point relating to parking on verges and need for greater protection has been added.
Pastor of the chapel commented that they are looking to repairs and decorate the chapel to enhance its appearance.	Noted.

Forncett:

Comment	Response
Various additions relating to St Peter's Church	Agreed. Appraisal text will be amended
Request for a web page link to be added in respect of St Mary's Church	Agreed. Appraisal will be amended
Update reference to the village hall and allotment	Agreed. Appraisal will be amended
Head of Primary School concerned at impact of extension to boundary on school activities	Agreed to limit the extension only to the buildings and playground which will not affect the operation of the school
Owner of Street Farm queried the change in the boundary opposite	Checked original maps and boundary did run across the field on a random line; proposed revision runs along road side ditch. Retain amended boundary
Several comments asking to extend the area north along Low Road, west along Cheneys Lane and south along Aslacton Road where there are significant listed buildings.	It is true that there are many listed buildings scattered along these roads. But they are interspersed with new buildings and/or agricultural land a character which does not lend itself to designation as a conservation area.

Gissing:

Comment	Response
Resident recommended at parish meeting	The farmhouse is grade II but is relatively
that Malthouse Farm should be included	isolated and some distance away from the
because of its heritage value.	upper and lower street clusters of the
	village, and therefore does not meet the
	criteria of extending the conservation area to
	include it. The building and its setting are
	already protected through its grade II listing.

Thorpe Abbotts:

Comment	Response
Parish Council - Some incorrect information	Text of appraisal document to be corrected
with regard to the history, including the use	with additional information included.
of the buildings. PC also provided additional	
information on history. Some descriptive text	
incorrect referring to details that have been	
removed.	

Parish Council - Pump not shown as a listed building and telephone box referred to as being listed but is identified as being of townscape significance in the appendix.	Map to be corrected to show pump as listed. Telephone box is not listed to text will be amended.
Local resident - Text refers to Home Farm being concealed in views from the road but this is not correct.	Text to be amended as building is visible.
Parish Council – Kerbs should sometimes be used to prevent deterioration of grass verges	Appraisal discourages the use of kerbs as this detracts from the rural character. Damage to verges does tend to occur in wet weather and is generally temporary. It is still considered that the use of kerbs would be more detrimental to the character of the conservation area. The use of some form of low height timber posts has been discussed for the green and could be a way forward. This will be referenced in the text as a possible solution for some areas
Parish Council – include school lane in the conservation area as there are some older rural cottages here.	School Lane, although part of Thorpe Abbotts, is very much separate from the main settlement. Although there are some older estate houses here, they are quite remote and do not justify creating an additional extended area as part of the conservation area.
Local Resident – historical information on Lion House incorrect as it was not built as one of the estate houses and was originally a public house.	Text to be amended to provide the correct information.
Parish Council – A water course does flow from the old airfield into the settlement.	Appraisal currently refers to the lack of water courses so the text will be amended to take into account the PC's comment.
Parish Council – There is a County Wildlife site at the back of Thorpe Abbotts Place – can this be included?	Appraisal primarily deals with the character of the settlement in the context of its built heritage. Whilst the natural character forms and important part of the character of the settlement in contrast to its buildings, we would not seek to include additional areas for their wildlife value.

Winfarthing:

Comment	Response
Several comments supporting the aims of the appraisal.	Noted
Three comments re the proposed boundary changes: Holly Barn: New boundary includes fruit orchard to the west which does not make a significant contribution to the area	Agreed, revise the boundary accordingly.
Winfarthing Primary School concerned at the effect the change would have on school activities	A revision was required to take account of the extensions to the school and play ground. There is no reason why their inclusion would have any detrimental effect: retain revised boundary line.
Woodsfield: Owner concerned that extension to boundary would compromise the work they have done to improve their site, that two outbuildings are of no value, and part of the included area is owned by someone else.	The present boundary does not include a later extension to the listed house, so the main reason for the change was to include that and find a clear boundary line to avoid any confusion in the future. The boundary is to be drawn along the old boundary line prior to the curtilage being extended.

Wramplingham

Comment	Response
Parish Council – design of existing railings	Text to be amended to include safety
was dictated by safety issues. This could be	reference.
referenced in the appraisal document.	
Parish Council – Telephone box in centre of	Test to be amended to include reference to
the village could be referenced as a key	telephone box. Take a further look at the
feature, owned by Parish Council. To	loading stand to see how best to reference
highlight an old milk churn loading stand	in the text.
near to the Old Kings Head which might be	
conserved.	



Burston

Conservation Area Character Appraisal and Management Guidelines

July 2021









Content

Introduction	3
Historical Development	4
Character Assessment	5
Conservation Management Guidelines	13
Appendix 1(i) - Listed Buildings in Burston Conservation Area	15
Appendix 1(ii) - Unlisted Buildings in Burston which are of townscape significance	15
Appendix 2 - Policy & Consultation	16
Appendix 3 - Conservation Area Boundary	17
Appendix 4 - Historic Map	18
Appendix 5 - Streetscape	19
Appendix 6 - Natural Character	20

Introduction



Church of St Mary set amongst trees

The historic core of Burston is concentrated around the Church of St Mary, the village green and the Burston Strike School. The landscape character is also important to the village with a number of important trees in the centre of the village and existing hedgerows. Consequently, although the village has seen some growth in the 20th century, it still retains a very rural character.

Under the terms of Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is required to identify areas of special architectural or historic interest whose character or appearance it is desirable to preserve or enhance, and to designate them as a Conservation Area. The 1990 Act also requires local authorities to prepare management guidance and proposals for Conservation Areas. Burston conservation area was originally designated in 1994. This document should be read in conjunction with the adopted Local Plan, the National Planning Policy Framework and Planning Practice Guidance.

Key Characteristics

- Key buildings within the area include the Church of St Mary, the Crown public house and the Burston Strike School
- The Strike School is grade II* and of national historic importance to the labour movement
- The centre of the village retains its rural character with landscaping and open spaces including the churchyard and the village green, trees and hedgerows.
- Dwellings are predominantly detached with a varied grain typical of a smaller rural village.

Historical Development (also see historic map in Appendix 4 p18)

In the Doomsday Book (1086) the village is referred to as Borstuna, in a 12th century record as Birston, and in records of the 13th century as both Burstone and Burston. Its meaning is possibly tun (homestead or village) [by the] byrst (landslip). Old English in origin, the name indicates an Anglo-Saxon settlement, predating the Norman Conquest. Blomefield's History of Norfolk refers to the village "at first being three parts,...,the whole town then being two miles long and one mile broad." In 1736 there were 48 houses.

The oldest building in the village is the church, dedicated to the Virgin Mary. The church previously had a round tower and was Saxon or early Norman in origin. The church was described by Blomefield as "The Church is small, and is leaded; the south porch and chancel are tiled; the steeple is round at bottom, and octangular at top, having five bells." The tower fell in 1754 and unfortunately the villages could not raise £225 to rebuild it, so permission was given by the Bishop to sell four of the bells to Tibenham to pay for the repair of the wall. The church then had a wooden turret erected for the one remaining bell, replaced later with the small bell turret which exists now. There was a Methodist chapel in Burston at least as early as 1845. The present building dates from the 1860s.

There were at least two moated sites associated with the village. To the north of the Crown are the remains of a moated site (NH 10991) and it is proposed to include this site within the area. The South and East side of the moat are still filled with water, whilst the north and west sides have been filled in but can be seen as depressions. There is also a moated site to the south west just outside the conservation area (NH 10992), although a modern house now stands on the platform.

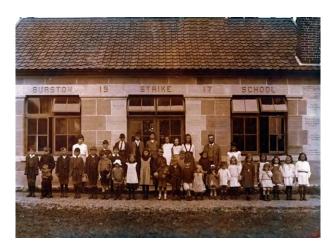
The relatively quiet rural life of this small country village changed with the building of the railway line from London to Norwich in 1840. The line passes a little east of the main village and a station was opened in 1840 but closed in 1966. Interestingly the Strike School has several stones laid with inscriptions from various railway union branches across the country showing the connections the village had to the railway line.

The Strike School, built in 1917, is the site of the longest recorded strike in England's history. It is listed grade II* and of national significance to the trade union and labour movements despite its relatively humble origins and construction. The school teachers Kitty Higdon and her husband Tom came to Burston in 1911 to take charge of the school. She was a fully qualified teacher. He worked as her assistant and was also a Primitive Methodist lay preacher as well as an active supporter of the Agricultural Labourers' Union. In their previous post at Wood Dalling they had not only complained about the condition of the school building, but had also drawn attention to the bad housing conditions and low agricultural wages in the village. Conflict with the school managers, mostly local landowners or farmers, came to a head when Tom Higdon was accused of assaulting a farmer for employing a boy who should have been at school. The Higdons had been given the options of dismissal from the school service or of moving to Burston.

Unlike many villages Burston had no resident squire and was largely run by tenant farmers and the Rector. As School Managers, their purpose, as they saw it, was to ensure that the children were brought up "in the fear of the Lord", to respect their social "betters" and to fit the role for which most of them were destined: the boys as farm labourers, the girls as domestic servants and then mothers. Few at this time would have quarrelled with these ideas, least of all in the countryside, but the Higdons stood for other values. They encouraged their pupils' interests outside the classroom and beyond the "three Rs", came and set them higher aspirations for their lives. Though as Christian Socialists, they attached to the Bible as much importance as the Rector did, the social gospel which they drew from it questioned the status-quo.







Kitty Higdon, Tom Higdon and the children outside the Strike School

In 1913 Tom Higdon caused a sensation by being elected to the Parish Council at the expense of the Rector. Sooner or later conflict with the School Managers would be inevitable. After complaining about conditions in the school building, Kitty Higdon was criticised for lighting a fire to keep it warm without express permission. Then she was accused of beating Barnado children. The Managers requested the Higdons be transferred, and although an Enquiry found that the only charge which could be sustained was one of discourtesy to the Managers, they were nonetheless dismissed.

The consequence was to be so novel and unexpected that the Rector at first thought it was an April Fool. On April 1st 1914, sixty-six of the seventy-two children of Burston School, supported by their parents, went on strike and marched around the village with placards demanding 'Justice' or 'We want our teachers back'. At first the Higdons taught them in a marque on Church Green, but soon a 'Strike School' was opened in a disused workshop. Collections were made to pay school non-attendance fines. The cause attracted nation-wide interest, particularly in Trade Union and Women's Suffrage circles, and supporters, taking advantage of the easy train journey, would come down from London at weekends to speak at open-air meetings on the Green.

The strike divided the Chapel: members of the congregation who supported the strike held services on the Green, led by a lay preacher whereas others opposed to it resigned their membership. The Chapel virtually closed for some years as a result.

A nationwide fund was launched to erect a purpose-built Strike School and to pay the Higdons' salaries. Surprisingly perhaps, in the light of the controversy it must have caused at the time, the building, completed in 1917, stands confidently at the very heart of the village, between the Green and the Church. Its foundation stone, laid by George Lansbury, later to become Leader of the Labour Party, records why it was built and proclaims it as a "centre of rural democracy and a memorial of the villagers' fight for freedom". Other stones record the names of subscribers to the fund, which included many Trade Union branches as well as individual supporters.

The arrival of a new Rector in 1920 marked the start of a period of more friendly rivalry between the two schools in the village. The Strike School finally closed in 1939 following the death of Tom Higdon. By then there were only twelve children left to be transferred to the Council School.

The Strike School is now a museum covering the background and history of the strike. A commemorative rally is held on the green every September.

Although outside the conservation area, the mill to the north of the village has had quite an impact on the village. In 1922 William Tuck bought the old windmill at Mill Green and began animal feed production. The mill remains an important local rural employer, however HGVs accessing the mill

along Mill Road have caused some damage to the verge side and the heavy vehicles disturb what would otherwise be a relatively tranquil village.

In recent years there has been the building of a number of substantial houses in the village, such as those in Higdon Close, and the houses opposite the Church, as well as the modernisation and extension of older cottages. These developments reflect the changing nature of the modern village, from a predominantly agricultural settlement into a desirable place from which to commute or retire.

The green formerly known as Crown Green to the east of the church is now a gravelled car park. The area was being used for parking for the Crown pub and this has been formalised, but with the area in front of the pub changing from a parking area to lawn. This has improved its immediate setting.

Despite new house building, the population of the combined parishes of Burston and Shimpling has only increased very slightly since mid-century. The population was 502 in 1951, 475 in 1961, 411 in 1971, 491 in 1981, 540 in 1991, 538 in 201 and 568 in 2011.

Character Assessment

(Also see Streetscape and Natural Character Maps in Appendices 5 and 6 pages 19 and 20)

Burston and its setting

Burston is set on a flat plateau north of the Waveney valley. It is some two and a half miles northeast of Diss and about one and a half miles west of the A140 road from Norwich to Ipswich. A network of minor roads as well as an unusually large number of public rights of way crisscross this area, and Burston marks the meeting point of several roads and footpaths. The main railway line passes the village at a level crossing about half a mile to the east.

The centre of the village retains a very rural character with buildings set at varying orientations and amongst landscaping. There are however limited views of the open countryside from within the village.

Conservation Area Boundary

The Conservation Area was designated in 1994 and centres on the two greens of Church Green and Crown Green, although Crown Green has now become the car park for the Crown public house. It also includes the Church and the Strike School both situated between the two greens, development west along Diss Road as far as Valley Farmhouse and development north along Mill Road as far as Crown Farm. The conservation area has been extended to include the archaeological moated site to the north east and an area of trees along Rectory Road.

Street Patterns and Historic grain

The village was historically relatively dispersed fronting onto historic lanes. There is no consistency in curtilage size, building orientation, buildings lines or setbacks, which contributes to the more informal rural character of the village. Later infilling has concentrated development along Diss Road, and there is large estate to the east of Rectory Road known as Audley Close, which lies outside the conservation area.

Perambulation

Diss Road

Starting with the western approach into the village from Diss, the first building is the grade II listed Valley Farmhouse, dates back to the 17th century. It is typically timber framed and rendered and in terms of appearance relatively plain with a simple form and casement windows. Unusually the roof is a mix of red and dark coloured pantiles, but in no discernible pattern. Hedgerows and trees are already important in providing character to the street.

The next house, Beechwood, is relatively modern, but with a traditional gabled form, and notable for its mock timber framed porch, which could be considered incongruous within a rural Norfolk setting. Unfortunately, the garage and solar panels are also prominent, but the house is set back from the road so these do not have a significant impact on street views. The next house, Elm House, is also a humble timber framed rendered cottage and 17th century in date. It has an attractive porch with a decorative bargeboard. To the left of the elevation is a screen wall capped with a castellated parapet which provides some interest. The roof has a lower pitch, indicating a later date, with red pantiles and a central replacement stack.





Elm House Amberwood

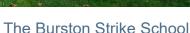
The road now crosses a brook which runs relatively discretely through the village and therefore not a prominent and defining feature of the settlement. On the right hand side is Rose Villa, a long and narrow house with an unusually shallow plan and set at an unusual angle to the road. This was previously three cottages amalgamated into one, which would account for its elongated form. The house is constructed in red brick with black glazed pantiles, and with quite large and wide casements windows (the central opening window being metal), stone/plaster lintels with decorative vermiculated keystone, and gault brick dressing to the side of the windows. This is the only example of such brickwork in the conservation area. The building has a date stone on the west gable: J.S. 1868.

On the west side is a modern bungalow called Dun Roamin', and is positioned relatively discretely behind a hedge. In contrast the south side of the road opens out with a front lawn to a modern house, Fenlands. The openness of the front lawn without defining hedgerow marking its boundary would be considered detrimental to the character of the conservation area, however in this case it complements the openness and spatial qualities of the village green opposite. The blank gable end facing west, being featureless, is a little unfortunate. This is followed by the large 19th century house, 'The Firs', notable for its twin gables and decorative 19th century bargeboards. On the north side is a 19th century house called Amberwood, which fronts towards The Green.

The village green is an important part of the conservation area and one of its defining features. As previously mentioned, Amberwood fronts directly onto the green with a symmetrical elevation of sash windows, which is unusual in the village. It is important that the relationship of the house to green is maintained. Unfortunately, the currently windows are replacement with 'mock sashes' with top opening casements rather than sliding sashes. Thick landscaping obscures views of open countryside to the north and consequently there is not a visual connection to it. To the east of the green the Burston Strike School is situated in a very prominent position also fronting onto it.

The green is a significant historic space in the village, having been the place where the strike school teachers first held their lessons in a tent, and where the Strike School was chosen to be built. A yearly commemoration event takes place on the green on the first Sunday in September and is attended by notable public figures of the trade union and labour movements, including well known members of parliament. Also located on the green is a small modern brick war memorial with a flagpole, and the village sign which is a totem pole designed and made by Martyn Welch. Thick landscaping obscures views of the church and the graveyard to the east. Because the church no longer has a tower it is not as prominent or as much of a landmark as parish churches in other villages, although it is still very much remains a focal point for the community.







The Crown

The modern housing on the south side of Diss Road is designed with traditional gable forms and red brick. With the associated frontage landscaping they do not detract from the setting of the conservation area and can be considered to have a neutral impact. The conservation area includes on the south side an important group of trees but not the modern houses. A further group of trees along Rectory Road have now been included to complement the existing group of trees around the junction.

On the north side of the road is the church of St Mary within its landscaped churchyard setting. There are numerous trees within the churchyard, which is also surrounded on the south and east sides by a ditch and hedge. Consequently, the church and its churchyard have a relatively 'contained' setting.

Mill Road

Mill Road is a narrow rural lane without a footpath. There is not much general traffic on the lane, but it is a route used frequently by HGVs accessing the commercial mill to the north of the village. These lorries have caused quite a lot of damage to the verge adjacent to the churchyard and it may be considered suitable to give it some extra protection.

On the east side of the lane is the Crown Inn, originally a C17 house but now the village pub. Between the road and public house was an historic green called Crown Green. In the tithe map this is shown as an open area and later C19 map shows it as an open green with a diagonal footpath. The green is now gravelled and used as a car park for the pub, however the previous area in front of the pub (which was gravelled) has now returned to lawn, improving the setting of the listed building. Parked cars are quite effectively screened by the boundary hedge in street views. The inn is a red brick facing with an earlier timber frame core. The steep sloping roof pitch indicates that the building was originally likely to have been thatched. To the north is a house called The Old Pavilion, which used to be pavilion for the old bowling club.

Further along Mill Road on the west side is the Red House. This has an important principal elevation fronting the churchyard rather than the lane, and there is interesting pargetting (decorative plasterwork) which is more common in southern reaches of the county. The historic attached barn was actually erected in the early 2000s, and according to the Norfolk Record Office (NH37371) is a French barn relocated from St Gilles in France.

The small rendered chapel remains in use but is very plain in appearance. Nos 5 & 7 is a traditional 19th century clay lump semi, unfortunately now with modern casement windows and concrete tiles. The next building is a relatively new terrace of four houses with broken massing, dating from 1993. The middle cottages are a full two storey whereas the two end units are a storey and half. The barns relating to Crown Farm are modest red brick farm structures which need some attention in terms of repair. Crown Farmhouse is an interesting building originally being timber framed and dating from the 17th century, but encased in brick in the 19th century, and with casement windows installed, as well as drip mouldings to windows and decorative bargeboards. The house is largely obscured from the street views by the thick hedging to the front.

To the east it is proposed to include the land and orchard, which is important archaeologically as the site of a former medieval house with the existing moat still partially extant and visible.



The Chapel and 5 & 7 Mill Lane



Barns associated with Crown Farm

Traditional Materials & Architectural Details

Examples of most of the building materials traditional to South Norfolk can be found within the conservation area.

Clay pantiles are the most prevalent roofing material. These are mixture of black and red pantiles. Slates are found on the Church dating from its restoration in 1853. Bargeboards are a feature of a number of houses. With older properties the opportunity to replace concrete tiles with clay tiles would enhance the character of the village.

There is a mixture of earlier rendered timber framing and red brick, although some white gault brick has been used for detailed elements at Rose Villa. In some cases the brick has been used to re-face earlier timber framed buildings, as at Crown Farmhouse, the Crown public house and Rose Cottage, or as a face to clay lump construction, as at the Chapel (side walls).

There are a number of rendered buildings, in some cases over timber frames, as at Valley Farmhouse and Elm House in Diss Road, and, in Mill Road, at Red House. In others, possibly over clay lump, as at a house opposite Church Green, Nos. 5 and 7 Mill Road and the Strike School. The Red House has pargetting (decorative patterns) on its rendered elevations, a tradition more associated with Suffolk than in Norfolk, but sometimes found in the south of the county.

The Church is mainly of flint construction. The front wall of the Strike School is stone faced ("ashlar") with a number of names of donors and supporters of the school, including Leo Tolstoi, the son of Leo Tolstoy the Russian writer. These building materials are specific to these two properties and should not be taken as the general material for houses in the area.



Render and pargetting



Steep gables, pantiles, red brick and bargeboards

Natural Character



Extensive tree coverage in the centre of the village

The natural character is important to retaining the rural character of the central area of the village. Although only a small village, the central areas and approaches to the centre feel quite self-contained without views into surrounding open countryside.

Street Furniture, Walls and Railings



The village's new war memorial

The village sign (see front cover) and war memorial are situated on the village green in a prominent position. The war memorial is a relatively new addition with a flagpole.

There are no walls or railings of note in the village, mainly being characterised by rural character with hedges.

Conservation Management Guidelines

Highways



The verges on Mill Road have been eroded and scarred by the heavy goods vehicles.

Although verges should be kept informal there may be a need to give some protection to the verge on the west side of the road.

Upgrading Windows and Doors



In some cases windows and doors have been replaced with different materials such as uPVC and/or different styles.

If door or window frames need to be replaced they should ideally be replaced with the original style of windows and materials. The opportunity should be taken to reinstate traditional style windows where they have been unsympathetically replaced in the past.

Fencing and walls



The village centre retains a rural character with hedgerows as well as spaces linked to the village green. Inappropriate boundary treatment such as close boarded fencing would be harmful to the character and appearance of the conservation area.

Boundary treatments require careful consideration to ensure the rural character of the village is preserved.

Painting/colour washing buildings



A number of properties within the conservation area are timber framed and rendered. Although there is a variety of colours, the colours chosen are generally muted pastels to match historic limewash and currently well chosen.

Colours should be well chosen to match historic limewash.

Verge car parking



Properties built without adequate parking spaces on Rectory Road, which is relatively narrow and does have large agricultural vehicles passing along it, has led to verge parking. This has consequently damaged verges and is unsightly.

Enhancement opportunities should be considered to provide adequate parking for residents without damaging the verges, such as grasscrete plastic matting.

Appendix 1 (i)

Listed Buildings

Diss Road Valley Farmhouse, Church of St. Mary (Grade II*)

Church Green The Strike School (Grade II*)

Crown Green The Crown Public House

Mill Road Red House, Crown Farmhouse

Appendix 1 (ii)

Unlisted Buildings of townscape significance

Diss Road (north side) Elm House

Amberwood

Diss Road (south side) Rose Villa

The Firs

Mill Road Burston Chapel

Nos. 5 and 7.

Barn & attached buildings belonging to Crown Farm

Policy background

In recent years, the approach to conservation area designation has changed considerably. It is now recognised that development plan policies, development control decisions, and proposals for the preservation or enhancement and the management of conservation areas, can best be achieved when there is a sound understanding of the special interest of the conservation area.

This position is reinforced as follows:

The Planning (Listed Buildings and Conservation Areas) Act 1990 in section 66(1) makes it a duty of local authorities when considering applications to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest.

Under section 72 of the same Act, it is a duty with respect to any buildings or land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

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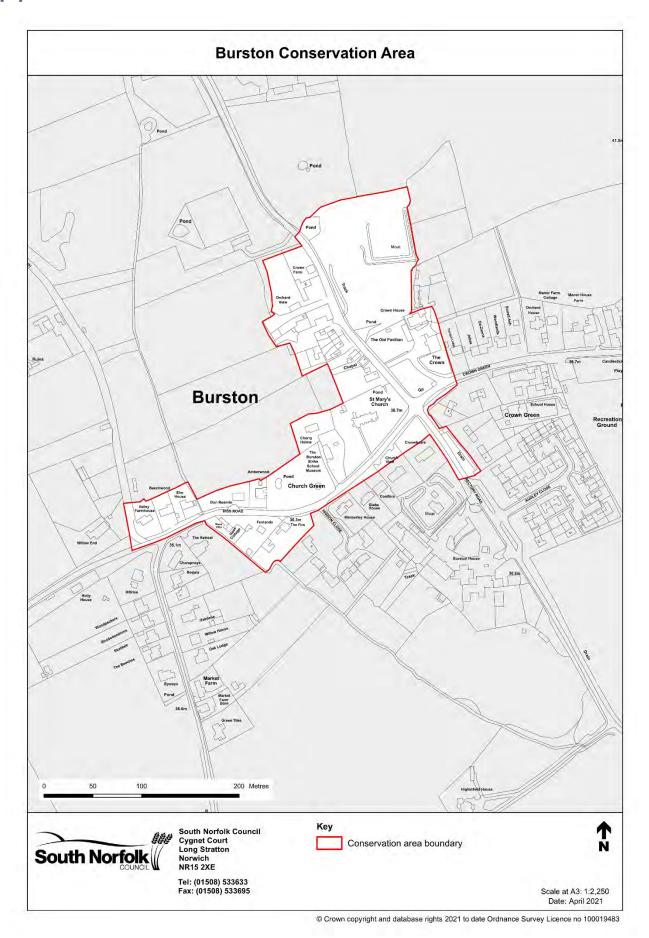
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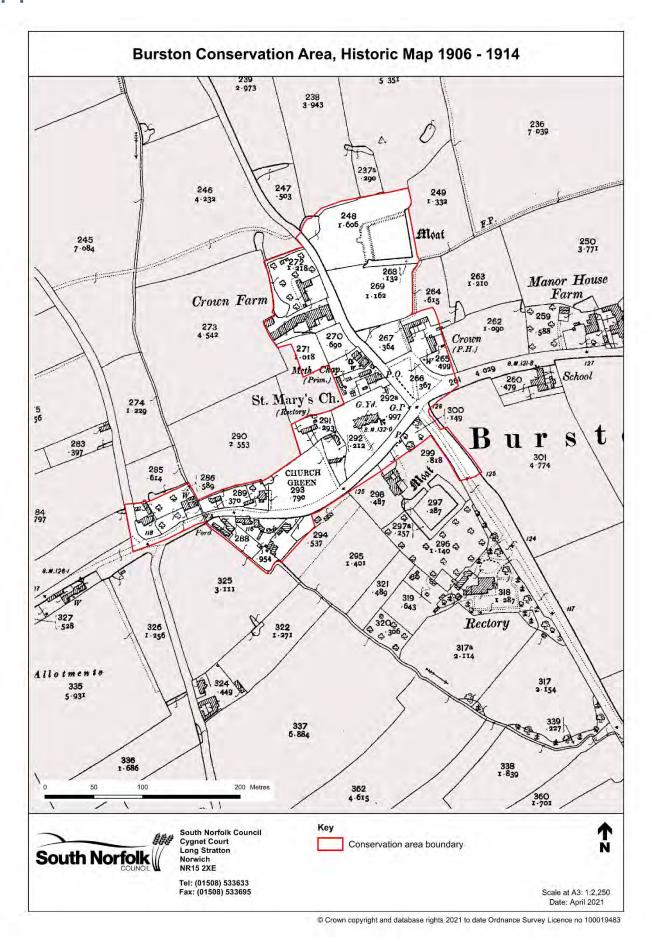
Public Consultation

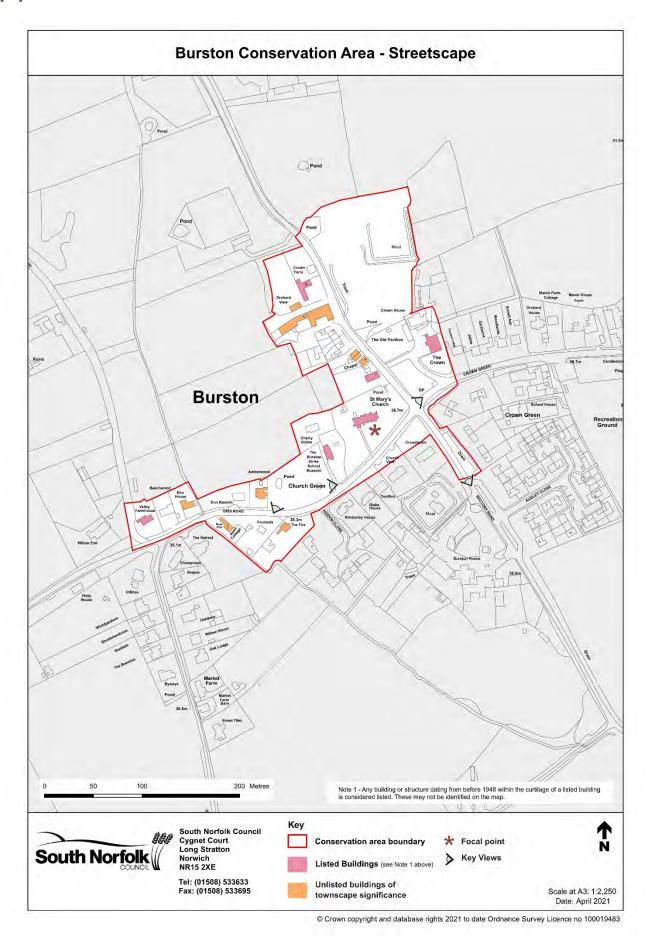
An informal 'walkabout' of the area was organised with the Parish Council on 21st January 2020. This informed the proposed boundary changes and the conservation management guidelines within the draft appraisal. The public consultation on the draft appraisal took place from 15th February to 15th March, with attendance at the parish meeting on 16th. Due to the Covid-19 Lockdown regulations the public meeting was carried out through virtual attendance at the parish council meeting online. The consultation and parish council meeting were advertised through:

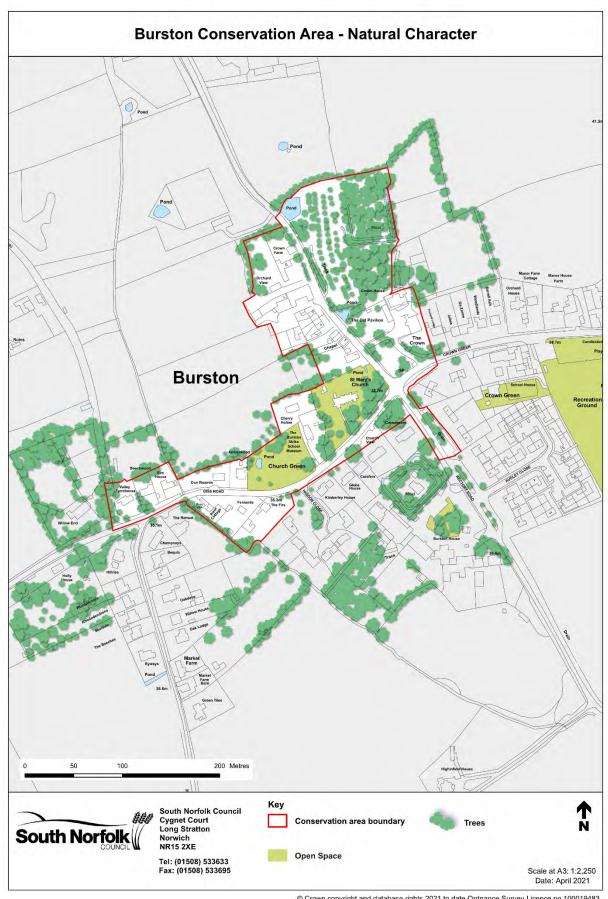
- An advert in village notice board and local publicity by the parish council
- The draft appraisal being available to view on the council's website.
- Emailing Ward Councillors, County Councillors, the Parish Council and Historic England.
- Contacting residents directly affected by the proposed boundary changes by letter informing them of the consequences of being included in the conservation area.

As a result of the consultation corrections were made to the appraisal and a further conservation management guideline was added relating to verge parking on Rectory Road.











Forncett

Conservation Area Character Appraisal and Management Guidelines

July 2021









Content

Introduction	3
Historical Development	4
Character Assessment	6
Conservation Management Guidelines	15
Appendix 1(i) - Listed Buildings in Forncett Conservation Area	16
Appendix 1(ii) - Unlisted Buildings in Forncett which are of townscape significance	16
Appendix 2 - Policy & Consultation	17
Appendix 3 - Conservation Area Boundary	18
Appendix 4 - Historic Map	19
Appendix 5 - Streetscape	20
Appendix 6 - Natural Character	21

Introduction



Forncett lies about 4 kilometres west of the main Norwich to Ipswich (A140) road. The parish comprises three "parts": St Marys in the north linking to St Peters in the south, with Forncett End at the western edge where it merges with Tacolneston.

Under the terms of Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is required to identify areas of special architectural or historic interest whose character or appearance it is desirable to preserve or enhance, and to designate them as a Conservation Area.

The village sign

The 1990 Act also requires local authorities to prepare management guidance and proposals for Conservation Areas. Forncett conservation area was originally designated in 1994. This document should be read in conjunction with the adopted Local Plan, the National Planning Policy Framework and Planning Practice Guidance.

Key Characteristics

- A linear settlement shaped by trees and hedges
- Significant churches at each end of the area
- River valley setting, with open east aspect
- Spaces between historic buildings largely infilled by modern dwellings

Historical Development (also see historic map in Appendix 4 p19)

The village is referred in Domesday Book (1086) as *Fornesseta*, while a record of the twelfth century has *Fornesset* and one of the thirteenth century, *Fornesete*. It is thought to derive *Forne's* saete. *Forni* is an Old Scandinavian name and *(ge)set or saete* is an Old English word for "abode". It certainly therefore predates the Norman Conquest.

Though always one benefice, originally St. Mary's was the "mother church", while St. Peter's Church was only a "chapel of ease" serving the outlying hamlets of *Kettleton End* (now Forncett End) and *Swanton* End *or* Tuantuna (now Forncett St. Peter).

After 1496, the [position of the churches was reversed, St Peter's becoming the parish church. Both churches are now part of the 7 church parish of Upper Tas Valley All Saints.

Domesday Book refers to four *vills* (hamlets) within the present-day parish: the three just mentioned together with *Middleton or Middletuna* (now Bustard's Green). By the early fourteenth century records refer also to the hamlets of *Galegryne* (in the area of Cheneys Lane) and *Sugate*, and there are later references to *Morgate* (south of Forncett St. Peter) and *Lovington*.

Immediately before the Norman Conquest the manor of Forncett belonged to Bishop Stigand. It was clearly a 'grand manor", holding lands or other manors in no less than sixteen *towns* (i.e. villages) at the time of the Domesday Survey. Following the Conquest, the lordship of the manor was granted to Roger Bigod, one of William the Conqueror's "attendants". In the fourteenth century it was granted by the King to Thomas de Brotherton, from whom it descended to the Howards, Dukes of Norfolk and in whose ownership it remained till the nineteenth century. Their manor house may have stood on the site of Yew Tree Farmhouse, Low Road, Forncett St Mary, a fifteenth century "Wealden"-type house but its location is not certain.

A series of manorial accounts and court records for Forncett have survived from the thirteenth to the sixteenth century. In 1906, Frances Davenport used these accounts and records to give us a glimpse of the life on a manorial estate during this period.

She found that between a third and a half of the fields of Forncett were already enclosed when a survey was made in 1565. A study carried out three hundred years later, found that many of the field boundaries still survived, their irregular alignments contrasting with the straight lines of the enclosures of the eighteenth and nineteenth centuries. It seemed that much of what was now no more than rough fen and carr had, in the mid-sixteenth century, been productive pasture.

The building of a main railway line in the 1840s, included a station at Forncett, to the east of the area, and gave the villagers another way to reach Diss, Norwich and even London. Life can never have been the same again.

From 1846 to 1853 J. W. Colenso was Vicar of St Mary's before becoming Bishop of Natal, where he was known as *Sobantu* (father of the people). His concern for the people led to his exposing colonial corruption and to denouncing the Zulu War. He was also the author of textbooks on mathematics. His Village Sermons were originally preached in Forncett St Marys.

The Church built the School at St Peters in 1848. The school is still in use as a Voluntary Aided Primary School. In the same year the Rectory in St Mary, now Forncett Manor, was built at a cost of £1394.

For many years St Mary's Church was unused and officially redundant. But in 2009 the new owner of Church Cottage created a group which, with initial help from both Norfolk County and South Norfolk Councils, carried out essential maintenance and repairs aided by Harry Barker, a retired carpenter. The Church was taken out of Redundancy in 2012 and in 2014, the Bishop of Norwich granted licenses to enable weddings and other ceremonies to be carried out once again. The Church was back! More recent successful grant applications enabled the tower to be restored. A well- deserved Angel Award was bestowed on the Church for the best restoration project in 2015. Further details can be found on their web site: www.forncettstmarvchurch.org.uk. There is a Village Hall at St. Mary's, housed within the former school.

St Peter's Church is currently on the Heritage at Risk Register, requiring over £750,000 for essential repairs and renovations to secure the fabric and provide facilities to enable the building once again to operate as a community hub. The recently established Friends of St Peter's (FOSP) have secured grants of £28,500 and donations approaching £10,000, in advance of applying for a major National Lottery Heritage Fund Grant.

The population of the parish was 723 in the 1930s falling to 660 in 1951 then recovering to 793 in 1981. In 2001 this had risen to 1000 and 1126 in 2011. Most of this increase reflects the new residential developments in Forncett End.

More information about the history of the parish can be obtained via the Forncett History Group's web site: www.forncetthistory.net, and information about village activity can be found at www.forncett.info., which also includes a section on the churches.

Information about the "Save St Peter's ' campaign can be found at https://forncett.info/forncettchurches/st-peter.html.

A new book "History of St Marys Church" by Roy Tricker is also recommended.



Forncett village stores (courtesy of Forncett History Group)

Character Assessment

(Also see Streetscape and Natural Character Maps in Appendices 5 and 6 pages 20 and 21)

Forncett and its setting

The two settlements which make up the Conservation Area merge together along the west side of the Tas valley over about a 1km: Forncett St. Peter to the south and Forncett St Mary to the north. Low Road follows the valley and forms the main street of both settlements. Within the conservation area, buildings are confined to the higher, west side of the road, while the east side marks the boundary of the flood plain. At either end, however, where the river bends away from the road, the historic settlement switches to the east side of the road and here are to be found the two churches.

Near the south end of the area, Mill Road, climbs west from Low Road towards Forncett End, while Aslacton Road continues to the south. At the north end, Cheney's Lane heads west to Tacolneston. The river Tas comes closest to Low Road at Station Road which heads east towards the old station and Long Stratton. There are good views from Low Road across the valley to the gently rising ground to the east, while the Church of St Mary can be seen in the valley landscape from Station Road.



Views of the village hall

Conservation Area Boundary

The Conservation Area was designated in 1994. It presently takes in the linear settlement from Cheney's Lane to Mill Road. It currently includes mostly the developed frontages on the east or west side of the road. At the south end, the conservation area extends to include St. Peter's Church and the Old Rectory. While at the north end, it includes St. Mary's Church, the village hall, Forncett Manor and The Croft off Cheney's Lane.

Amendments to the area were agreed as part of this appraisal, mainly to incorporate changes in property boundaries since 1994, but also to include the copse and meadow opposite Corner and Laurel Farms. It is suggested that part of the farm land north of Laurel Farm is excluded.

Street Patterns and Historic grain

The character of the village is determined by the valley landscape: a flat flood plain running north south between gently rising ground to either side. Low Road runs parallel with the valley just to the west of the flood plain and most of the development is one-plot deep.

The bends in the road, with trees and hedges, only enable two or three buildings to be seen at any one time in a series of individual building groups. These typically comprised a farmhouse with barn and outbuildings, separated from one another by fields, hedges and tracks. More recently, these gaps have often been infilled by modern dwellings. The character of the village is still determined more by the relationship of buildings to the landscape and trees, than to one another.

A church stands at either end of the village, each set back from the road largely masked by trees, which limits their impact. At either end also is a large house in spacious grounds: the Old Rectory in St Peter's and Forncett Manor (originally built as a rectory) in St. Mary's. But again, their position and abundant trees screens them from the road.

Perambulation

From South to North



Contemporary extension to village Primary School with green roof



St Peter's Church

Aslacton Road

The Primary School is dated 1848. It is a good example of a typical Church School of this period, of red brick and slate with a Tudor-style doorway and drip moulds over windows. The school has been enlarged with a contemporary extension on the east side, beyond which a belt of trees to the north of the playground. There is a good brick wall along the south side. Opposite to the west, there are long views over rising ground and open fields.

The Church of St. Peter, The Old Rectory, Rectory Cottages

The Church and the Old Rectory are reached by an avenue, lined with fir and lime trees, running eastwards from Low Road almost opposite the junction with Mill Lane. The churchyard is bordered by trees, as is the paddock on the north side.

The Church of St. Peter, is listed grade 1. It has a Saxon round tower of the 11th century and nave, aisles and chancel in the Perpendicular style of the fourteenth and fifteenth centuries. It is built of flint with stone dressings and roofs of slate or lead. There is an extremely rare timber staircase in the tower probably dating from the 15th/16th century. An alabaster tomb of Thomas and Elizabeth Drake dated 1485 is of note. There are good examples of Victorian Stained Glass. Park railings and hedges enclose the churchyard. A modest car park has been formed to the left of the entrance screened from the road by a hedge. The village sign and the listed war memorial stand on the west edge of the churchyard, facing the road.

The Old Rectory is a fine brick house of the early 18th century, with two principal Georgian styled facades, one facing the avenue approach, the other, the garden. Low outbuildings, of some interest, surround a yard to the north. Dorothy Wordsworth lived here for several years and William visited on two occasions. Rectory Cottages, set behind a good boundary hedge, were built as one house in the 17th century. The building is L-shaped, probably timber framed with a steep roof covered with black-glazed pantiles.

A line of modern bungalows have been built on the raised bank on the west side of Low Road. The hedge boundaries, where they survive, have been set back to leave wide grass verges in contrast to the more traditional pattern opposite.



Claver's Cottage



Church Farmhouse

Rectory Cottages to Station Road

Trees and hedges predominate. Buildings remain on the west side, while on the east, behind the roadside hedge, are the open flood plains of the river.

At the southern end, only Clavers Cottage is of note, rendered and thatched with later extensions. Church Farmhouse to the north is a fine seventeenth century house, timber framed and plastered, with a pin tiled roof, traditional windows and a substantial central chimney. A fine group of farm buildings, in traditional design, complement the setting of the house, the ones to the rear are due to be converted to residential use. The range along the road edge particularly makes a positive contribution. This historic pattern with buildings closer to the road, has not been reflected with the later houses in the area.

Trees have generally been retained in the fore grounds of the houses to the north, and partially screen them, although the gravel access drives, and wide grass verges, are evidence of their presence.

The early 19th century Stone Cottage attracts attention due to its pebble flints and brick dressings, which is unusual for this part of Norfolk.



Stone Cottage



Bishops House (photo courtesy of owner)

The next three modern houses, and their outbuildings, try to reflect the traditional character but their outlines and detailing appear harsh in comparison to the adjacent White House. Its main wing comes forward of its neighbour, Bishop's House, a fine seventeenth century timber framed and plastered house with a central projecting two storey porch, and steep peg tiled roof. The crow stepped north gable is an attractive feature.

High hedgerows on either side of the adjoining track, provide a backdrop to the Bishop's House and separate it from two modern bungalows to the north, one of which has been nicely transformed into a more traditional cottage.

The Homestead is a timber framed house of the 17th century, with later alterations and an off centre chimney stack. It is set back from the road, and so the converted barn and single storev range along the road dominate the view, and make a positive contribution.

Station Road to the Village Hall

The buildings are confined to the higher west side but the views to the east are screened by willows and alders in the "copse" between the road and the river. The hedges, narrow verges and trees channel the view.

Significant works are in progress at Corner Farm restoring the building to its former character and appearance. The house is set back but its rendered walls, black tiled roof and shaped main chimney, is impressive. Its associated buildings behind make an attractive group.

Laurels Farm is another 17th century timber framed house. It stands at right angles to the road but is largely hidden from view by hedges and trees. Farm buildings to the north survive to form a traditional group,

From here, there are no hedges on the west side allowing views up across open fields. A solitary tree on the bank stands out while trees beyond shield the modern farm building. St Mary's Barn, now a house, appears at the head of the road.

Street Farmhouse is timber framed and plastered and has a steep black glazed pantiled roof with an off centre chimney stack. A good brick wall with a terra cotta coping divides the garden from the farmyard. Behind St Marys Barn are modern farm buildings.







St Mary's Barn

North of Street Farm are modern bungalows before the road then takes a sharp "S" bend to the east. On that side is Rattles, an attractive thatched cottage, gable to the road. On the west side of the bend, another modern bungalow, set back beyond a wide entrance and a sweeping drive. The garden is now open to the road: perhaps a new hedge along the road boundary would be a positive improvement?

On the east side of the bend, Blacksmith's Cottage, clad in modern fletton bricks, but is probably much older. Then, behind a high hedge and trees, lies Church Cottage, largely hidden with a small barn immediately to the north in traditional style.

The entrance to the church is alongside the War Memorial, designed by Thomas Rayson of Oxford, and carved by Harry Parfitt of Long Stratton. It was dedicated in 1921. An iron seat offers an opportunity to enjoy this peaceful setting.

The Church of St. Mary, also listed grade 1, was much restored in the late nineteenth century, from when the chancel dates. It had been redundant for many years until a commendable campaign to restore it began in 2009 which has brought the church back into use. It has medieval origins, of flint with stone dressings, with a pintiled roof and a thin unbuttressed tower, Like that of St. Peter's Church, the tower of St. Mary's can be seen from a distance, while the body of the church is all but invisible.

The Village Hall, originally a school, has rendered walls and a low pitched slate roof. The rough surfaced car park in front is pleasantly informal. It is divided from the former allotments, which are now called Jubillee Green and incorporated into the grounds of the village hall.

A high bank behind the Village Hall is planted with a variety of mature trees: and forms the boundary of Forncett Manor, which can be glimpsed through it. The grounds are most attractive and a perfect setting for the house itself, which was built in the late nineteenth century, in the high Victorian gothic style, of red brick, stone and slate and with tall elaborate chimneys. It is reached by a long curving drive from Low Road.

Cheney's Lane

At this point, Cheney's Lane cuts into the slope with steep banks on either side, with trees on the south side and open fields to the north. The back entrance to the Manor is marked by a high brick and flint wall and a two storey brick and slate outbuilding, both hard onto the road. The farm buildings of the Croft, now a dwelling, are also hard onto the road. The main block comprises a barn and lean-to of clay lump and pantiles; beyond it are stables, partly black boarded. The Croft itself is of great interest: a timber framed building possibly dating from the 15th century. It has a thatched half-hipped roof and some original windows survive, and a large 5-light mullioned and transomed dormer window with a carved beam over. It is largely hidden from view.



St Mary's Church



The Village Hall

Traditional Materials & Architectural Details

Examples of most of the building materials traditional to South Norfolk can be found within the Conservation Area.

Clay pantiles are the most prevalent roof covering. These are mostly red, but a good proportion are black or blue glazed. Red clay pegtiles are found on the Bishop's House and Church Farm, slates on St Peter's Church, the School and Forncett Manor, thatch on The Croft, Clavers Cottage and Rattles and lead on the side aisles of St Peter's Church.

The great majority of older buildings are timber framed, rendered and painted. The two churches are of flint with stone dressings; Stone Cottage is of pebble flints which is unusual for this part of the county. Part of Rectory Cottages, though of timber frame construction, is clad in brick. Several farm buildings (or former farm buildings) are of clay lump, rendered and painted or of timber frame clad in tarred weather boarding. The School and Forncett Manor, both Victorian, are of red brick, with stone dressings. Blacksmith's Cottage is probably of clay lump faced with a modern brick.

Architectural detailing

There are examples of tall, elegant and shaped chimneys, traditional leaded mullioned windows and Georgian sashes. Dutch gables adorn some of the historic buildings in the area.



Flint at St Marys



Porch at Church Farmhouse

Natural Character



Meadow land



St Peters Church yard



St Peter's Churchyard with war memorial

Trees and hedges are an important part of the Conservation Area. They provide an attractive setting to many buildings, help to maintain the street line, soften or mask out less attractive buildings and frame views across the valley floor.

The open spaces in the conservation area make a significant contribution. The open river meadows on the east side of the road, divided by hedges and trees. The two churchyards, the open farmland opposite Street Farm and the spacious, albeit, private, grounds of the Old Rectory and Forncett Manor.

Street Furniture, Walls and Railings



The War Memorial



EIIR postbox

All public roads and the drive up to the School are of tarmacadam. The avenue leading to the Old Rectory and to St Peter's Church, and several tracks leading to fields behind the frontage development, are gravel. Most private entrance drives are gravelled, but a few are also of tarmacadam.

There are a few notable walls or railings in the area: the section of the brick and flint wall to Forncett Manor along Cheney's Lane is one exception. Most of the boundaries are hedged. St Peter's churchyard has an agricultural style metal railing to its churchyard.

There is an attractive village sign, and two listed war memorials. A small post box survives at St Marys, so too a stone marking the boundaries between the parishes near Street farmhouse. The public seats in the area are plain timber or metal versions.



Gates to the Old Rectory

Conservation Management Guidelines

Highways & Footpaths



Along most lengths of the road, there is no formal footpath. Low Road is a busy thoroughfare and vehicles have eroded grass verges and broken tarmac edges, but road widening or kerbing the edges would have a harmful impact on the character of the area. One has been formed at the school, for obvious reasons, extending to St Peters Church and the bus shelter.

Should a case be made to extend the provision of paths, it would be better visually if they could be laid along the field side of the hedge.

Front boundaries



Most of the front boundaries tend to be hedges and this is part of the natural rural character of the area.

Their retention should be encouraged and any scope for new indigenous planting should be supported, subject to highway considerations.

Painting/colour washing buildings



Some of the buildings are rendered or brick with a light colour pastel finish that sits comfortably with the historic character of the area.

With any redecoration, the colours should be chosen to maintain that pattern.

Appendix 1 (i)

Listed Buildings (All Grade II, except as noted)

Low Road (west side) Clavers Cottage

Church Farmhouse

Barn west of Church Farmhouse

Stone Cottage

The Bishop's House and White House

Barn and Stables north-east of The Homestead

Corner Farmhouse

Laurels Farmhouse (Listed as 'Sunny Acres")

Low Road (east side) Church of St. Peter (Grade 1)

> War memorial The Old Rectory

Nos. 1, 2 and 3 Rectory Cottages (Street Farmhouse

Barn north-west of Street Farmhouse

Rattles

Church of St. Mary (Grade 1)

War Memorial

The Croft Cheneys Lane

Appendix 1 (ii)

Unlisted Buildings of townscape significance

Aslacton Road (east side) Forncett VA Primary School

Low Road (west side) Former farm buildings south and west of Church Farmhouse

> Farm buildings west of Corner Farmhouse Farm buildings north of Laurels Farmhouse

The Village Hall Forncett Manor

Outbuildings north of The Old Rectory Low Road (east side)

> Wall to Street Farmhouse Blacksmith's Cottage Church Cottage

Barn north of Church Cottage

Cheneys Lane (south side) Former farm buildings east of The Croft

Outbuilding and Wall to Forncett Manor

Policy background

In recent years, the approach to conservation area designation has changed considerably. It is now recognised that development plan policies, development control decisions, and proposals for the preservation or enhancement and the management of conservation areas, can best be achieved when there is a sound understanding of the special interest of the conservation area.

This position is reinforced as follows:

The Planning (Listed Buildings and Conservation Areas) Act 1990 in section 66(1) makes it a duty of local authorities when considering applications to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest.

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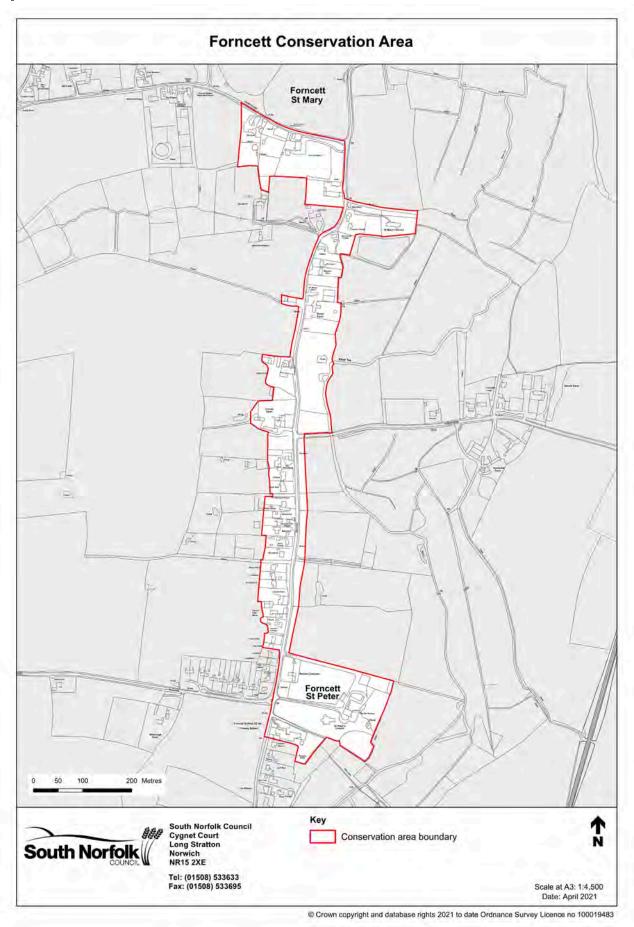
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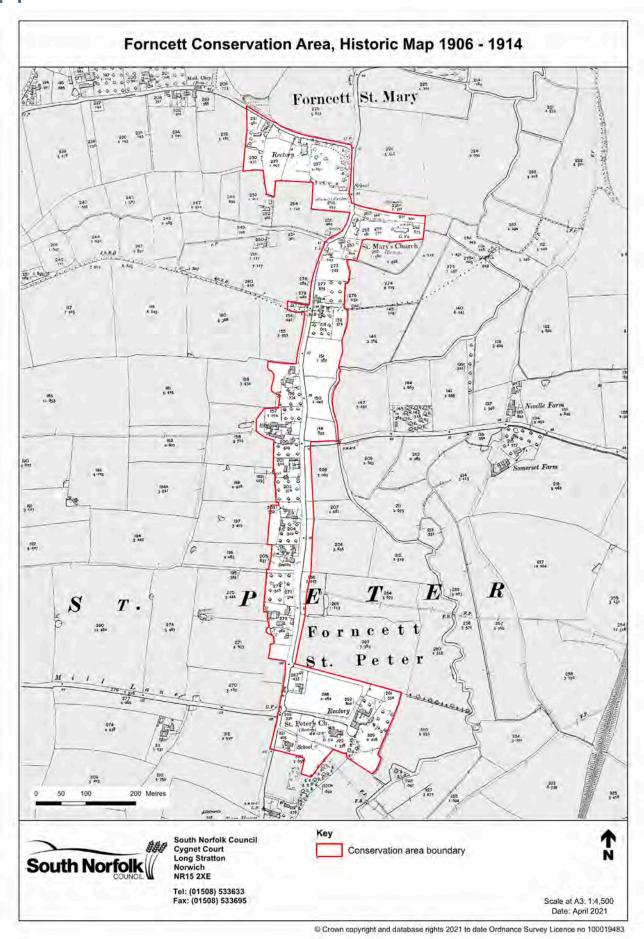
Public Consultation

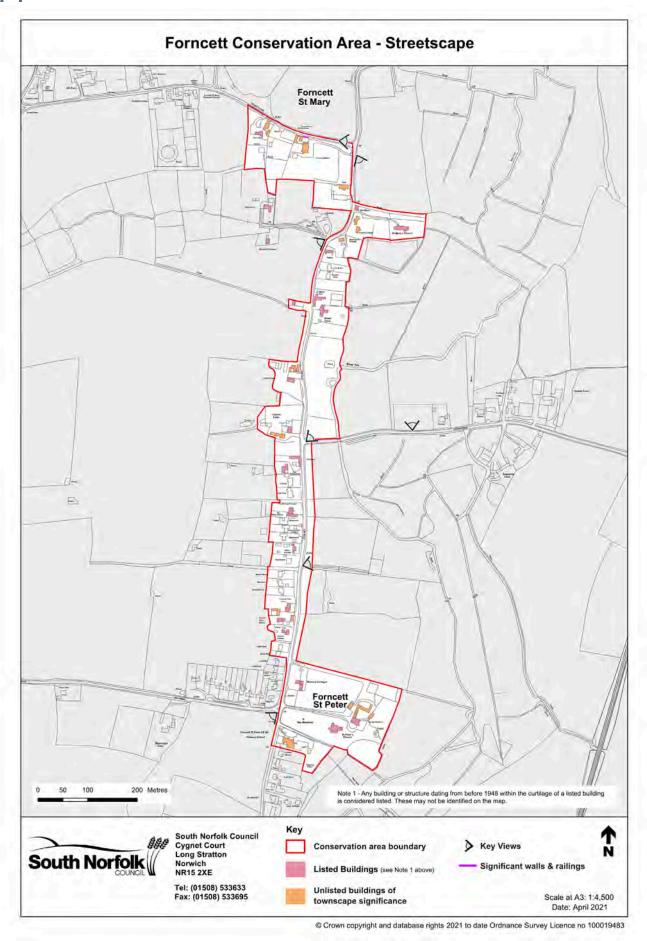
An informal 'walkabout' of the area was organised with the Parish Council on 24th January 2020. This informed the proposed boundary changes and the conservation management guidelines within the draft appraisal. The public consultation on the draft appraisal took place from 15th February to 15th March 2021, with attendance at the parish meeting on 18th February. Due to the Covid-19 Lockdown regulations the public meeting was carried out through virtual attendance at the parish council meeting online. The consultation and parish council meeting were advertised through:

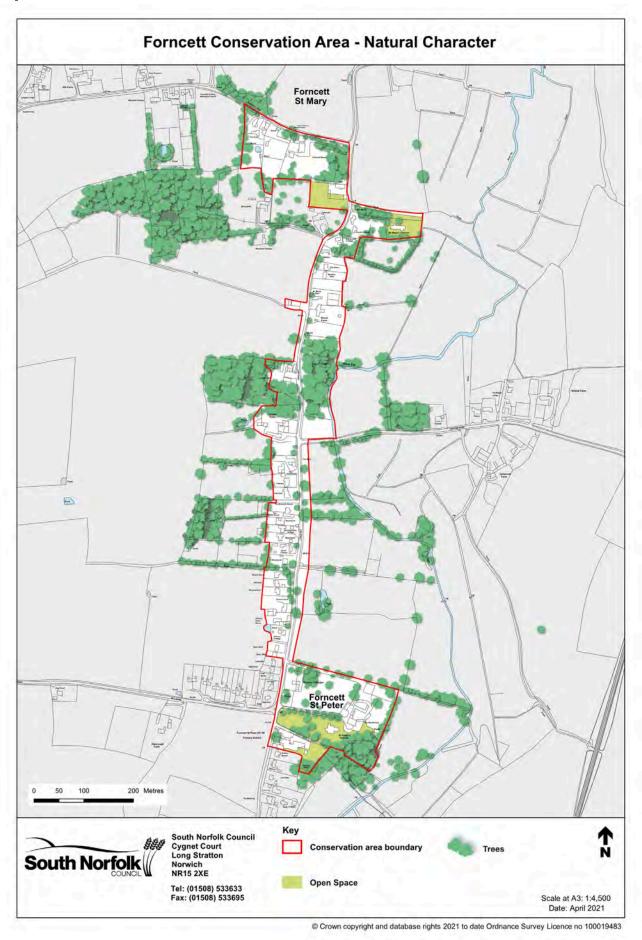
- An advert in village notice board and local publicity by the parish council
- The draft appraisal being available to view on the council's website.
- Emailing Ward Councillors, County Councillors, the Parish Council and Historic England.
- Contacting residents directly affected by the proposed boundary changes by letter informing them of the consequences of being included in the conservation area.

As a result of the consultation corrections were made to the appraisal. The boundary to the south east of the school was adapted to only include buildings and the playground.











Gissing

Conservation Area Character Appraisal and Management Guidelines

July 2021









Content

Introduction	3
Historical Development	4
Character Assessment	5
Conservation Management Guidelines	12
Appendix 1(i) - Listed Buildings in Gissing Conservation Area	13
Appendix 1(ii) - Unlisted Buildings in Gissing which are of townscape significance	13
Appendix 2 - Policy & Consultation	14
Appendix 3 - Conservation Area Boundary	15
Appendix 4 - Historic Map	16
Appendix 5 - Streetscape	17
Appendix 6 - Natural Character	18

Introduction



Norman South doorway

Despite being less than a mile from the Norwich to London railway mainline, Gissing has the feel of a hidden and remote village; rich in history and relatively untouched by time. The conservation area is formed mainly of the two separate areas of clustering around Upper Street to the west and Lower Street to the east, between which and to the south lies the former parkland to the old hall (demolished in c1700.)

The settlement has seen little development during the 20th and 21st centuries with only a handful of more modern detached dwellings, most to the south of the church. In recent years the church has been repaired, and there is an award-winning extension of the former school to create a well used new community hub.

Under the terms of Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is required to identify areas of special architectural or historic interest whose character or appearance it is desirable to preserve or enhance, and to designate them as a Conservation Area. The 1990 Act also requires local authorities to prepare management guidance and proposals for Conservation Areas. Gissing conservation area was originally designated in 1994. This document should be read in conjunction with the adopted Local Plan, the National Planning Policy Framework and Planning Practice Guidance.

Key Characteristics

Key buildings include the Church of St Mary, the Crown public house and the Community Hall (formerly the Village Board School and recently extended.)

- Two clustered areas of housing in Upper Street and Lower Street.
- Large area of former parkland with tree belts to the old hall, now farmed, between the two clusters.
- The church, community hall and The Crown public house are located in Lower Street which can be considered the village centre
- Houses mainly dating from 16th to 19th century with very little modern development

Historical Development (also see historic map in Appendix 4 p16)

The oldest building in the village and the most interesting in terms of historic development is the parish church. The church has Norman features but also some Saxon elements which date at least some of the church from the earlier period. Externally there is a striking contrast between the simplicity of the Saxon/Norman round tower with unknapped and course flint, and the flush-work of the knapped flints used to decorate the 15th century north porch (built in 1474). Unusually the porch is on the north side rather than the more normal south side – no reason has been found why.

The church is also however rich in Norman Romanesque detailing with arches of chevron detailing to both north and south entrances (the north arch contained within the later medieval porch.) The round windows half-way up the tower are identifiable as being of Norman origin though - they are known to have used round baskets as a frame to set the flints around. Saxon foundations have also been found under the north porch.

Internally there are features of interest too, with the two side chapels being associated with the Kemps, who were Lords of the Manor from 1324. The 15th century double hammerbeam roof with winged angels, unusually ornate for such a small rural church, is outstanding.

The Kemp family mausoleum is within the north chapel, which has a vault and is lined with an impressive collection of funereal monuments. The south chapel contains the family pew. Prior to the Kemps, the lords of the manor in the 13th century were the de Hastings who gave half of the patronage of the church to the monastery of Butley in Suffolk. The church was restored in 1876 and the south chapel was rebuilt in 1879 without disturbing the vault below. The floor has Victorian tiles dating from this period. A further extensive repair was carried out in 2017.

The ancient manor house of the Hastings and later the Kemps survived until c1700 when it was recorded as being torn down when the Kemp family moved to Ubbeston in Suffolk. The 1883 Kelly Directory records that Sir Robert Kemp suffered greatly for his loyalty to Charles 1st, who had made him a baronet. A decline in their fortunes may have been part of the reason for the move away from Gissing.

The second baronet, who was a member of parliament from 1675 to 1685, married Mary Sone, the only surviving daughter of John Sone of Ubbeston, following the death of his first wife. She inherited the estate, and hence the reason for the move of the Kemps to Ubbeston, although members of the family continued to be buried in the vault at Gissing. Blomefield described the former hall as having a remarkable collection of heraldic stained glass. The parkland was converted by the Kemps into a farm, with the collection of farm buildings to the south of the hall being retained. Part of the barn complex has now been converted to residential and the double moated site of the earlier manorial building survives to the north (NH10942.)

The present Gissing Hall is mostly hidden from view on Upper Street with its crenelated upper stories being glimpsed through and above the hedgerows. From the east it can be seen sitting slightly incongruously across the fields, rather like a red brick castle. The hall mostly dates in terms of its style and appearance from the rebuilding of the former rectory in the 1820s by the Reverend Sir William Robert Kemp. Being both the Lord of the Manor and vicar he combined the rectory with his manorial residence. The bulk of the house appears Jacobean in style, but is in fact a later 19th century copy. The house originally dated to the 17th century and parts of the original building appear to have been incorporated into the later dwelling. The hall remained in the ownership of the Kemps until the 1920s.

In the 19th century the Kelly directory described Gissing as 'a pleasant scattered village, 5 miles N. by E. of record that the parish registers were "destroyed by fire at the rectory some years ago" but that some 16th century fragments survived. Besides the Kemps the landowners are recorded as being the Norwich Free School and Doughty's Hospital in Norwich. Blomefield recounts that one hundred and fifty communicants were counted for the year 1603 in the church records.

By 1735 fifty-one houses and about three hundred inhabitants were recorded. Fifty years later the village was described thus:- "...it hath a fair, yearly on St James' Day (July 25th 1781) which in 1378 was granted to Sir Thomas de Gissing Knight together with a weekly market at Gissing, but that is now disused. The country hereabouts is a deep clay soil, and the roads very indifferent."

In 1881 the population was 454, showing that over the previous hundred and fifty years the village had grown by about fifty percent. The occupations this time include a shopkeeper, bailiff, wheelwright and post office keeper, eight farmers (one a woman), blacksmith and miller, three publicans, a plumber/shopkeeper, a baker/corndealer and a shoemaker. A Wesylan Chapel was built in 1860.

The population of Gissing declined from 364 in 1911 to 219 in 1981, but has recovered since to 265 in 1996. The settlement has a population of 252 in 99 households in the 2011 census.

In 1876 the Board School was also constructed, built for 88 children at a cost of £700, but closed in 1978 due to declining pupil numbers. The former school house was adjacent to the school. Both buildings have been used as a community centre since 1982.

A significant recent development of the village is the extension of the former school as a Children's Centre, incorporating a pre-school, and a new community hall, by the Heart of Gissing organisation. As part of the project a large extension was built to the east side of the school and completed in 2017, receiving a South Norfolk design award. The former village hall on Rectory Lane, dating from 1906, and a simple wooden structure on a brick plinth, is now disused and there is planning permission for a replacement dwelling. The church also underwent significant repairs with the help of a Heritage Lottery Grant in 2017. A History of Gissing Church is available by Avril Pierssene http://fogchurch.org.uk/media/GISSING-CHURCH-HISTORY-Avril.pdf

Character Assessment

(Also see Streetscape and Natural Character Maps in Appendices 5 and 6 pages 17 and 18)

Gissing and its setting

The conservation area is broken into two village clusters around Upper Street to the north west and Lower Street to the south east. There is also a cluster of housing to the south and other scattered houses around the area, including some houses near the railway bridge, which are considered part of the village settlement but are not within the conservation area.

The two areas within the conservation area are separated by fields and wooded areas which to the south of New Road formed part of the former parkland to the old hall. Although the tree plantation belts remain, the scattered parkland trees have been removed (still evident on the historic map) and the fields turned to arable. New Road links the two parts of the village and is in effect a rural lane free from development. Although the wider area is very flat, the extensive tree planting in the surrounding countryside limits longer distance views.

Lower Street is characterised by the irregular clustering around small greens on the corner. The church and community centre (the former school) and the Crown public house are in effect the centre and heart of the village. The group of buildings are viewed within a relatively spacious rural setting with open aspect to fields to the east and views across from Rectory Road when

approaching the village from the west. The church is very prominent along Lower Street and the church's round tower is visible from surrounding fields.

Upper Street buildings are arranged along rural lanes with buildings slightly set back and with extensive mature landscaping and hedging which limit views of the relative flat open countryside. The main house in the village, Gissing Hall, is set back from the road within its grounds and hidden from the street and public viewpoints – only its crenelated towers and roofline partially glimpsed through the hedgerow. Between Marlers Farmhouse and the other houses un Upper Street there are two long rectangular village meadows which are proposed to be include in the conservation area.

Conservation Area Boundary

The conservation area was first designated in 1994. It centres on three areas of Upper Street, Lower Street and the rural former rural parkland of Gissing Old Hall, which includes the former moated site with Hall Farm to the south. The fields are farmed but there are various remaining tree plantation belts which assist in define what was the former park area.

As part of the current assessment Upper Street area has been extended to include Marlers Farm and two meadows which are historic an important feature of this part of the settlement. At Lower Street the conservation area boundary house been altered to include the trees to the front of Pheasants Roost, but not the rest of the plot. Also, the conservation area has been widened to the east to include the new community building extension and the newly planted village orchard.

Street Patterns and Historic grain

The conservation area is guite loose knit and there is not a regular street pattern, with dwellings grouped into the two clusters of Upper Street and Lower Street. Due to the lack of more modern development, the setting of the church, the former school buildings and the Crown public house remain with a relatively spacious setting. New houses to the north east of the pub fit in with the existing character. In Upper Street the domestic properties generally address and front towards the lane but there is variety in plot sizes and building lines. This creates a very informal and rural character to the village which it is important to preserve.

Perambulation

There are three parts of the conservation separated by fields and open countryside, the part of the conservation area around Lower Street the form to the south church to the south east, and the part around Upper Street, including Gissing Hall to the north west, and the part to the south which was the former park land to the hall.

Upper Street area

Starting at the north end, there is marked transition during the approach along Common Road at the junction from Wash Lane from the flat Norfolk countryside of arable fields to the more enclosed character of buildings, trees and hedgerows.

On the east side is a cottage, now two properties, faced in red brick with a clay pantiled roof. The steep roof and low eaves indicate that the property was likely to be thatched and timber framed internally. The next house, 31, was built at a right angle to the street and was two cottages. In the noughties, the house was remodelled into a small cottage with traditional casement windows and a porch, and additional lean-to to the west. Behind is no. 33, again this was a row of small labourers' cottages, but is now combined to form one house with a low eaves and two eyebrow dormers, and brick gable ends.

6 Gissing Conservation Area Character Appraisal – July 2021







31 and 33 Upper Street

On the corner with Upper Street and New Road is the Old Post Office, a simple 17th /18th century gabled timber framed house. There are numerous architectural features – the remains of mullion windows at the north west end, and pargetted render. Pargetting is more of a tradition of Suffolk and Essex - although there are some examples in south Norfolk. On the south side is a good early 18th century door on the south end. A single storey extension to the west has a crow stepped gable and was the post office. To the south east corner is a small 19th century clay lump stables, now converted to residential. The south end wall is weatherboarded.

The houses on the west of Upper Street up to the junction with New Road are completely obscured by vegetation. Hidden from view 26 and 27 Upper Street is a 16th and 17th century timber framed and rendered with early 19th and more modern casements. More visible through the hedge is the large 16th and 17th century timber framed house with fragmentary remains of pargetting. The north part is a 17th century cross wing with jettied first floor on brackets and a jettied gable. These elevations have later sash windows inserted alongside earlier mullion windows which have been blocked up but with timber work re-exposed as a feature.

Following the junction on the west side there is again a low 18th century cottage with eyebrow dormer. The building was once single storey. The south end of the building was the bakehouse. This is followed by a modern brick house set back from the road, and a large farmhouse. The following cottage on the west side, the Chequers, is the picturesque thatched former pub, originally dating from the late 16th/17th century.

To the east side of Upper Street obscured by hedgerows and trees is Gissing Hall. The Hall was significantly remodelled in the Tudor/Jacobean style from the former rectory, which dating from the 17th century. The materials are predominantly red brick and slate, with crenulations, turrets and a clock tower. There is a more modern house now erected in the grounds to the west.

Further along the road following the bend, there is Firs Cottage – a former estate house now extended, and includes a coat of arms on the east gable end. Also, followed on the next corner by the listed 17th century Marlers Farmhouse. It is proposed to now include the paddock/field on the north side of the road and there are good views across to the collection of pantile roof pitches.





Chequers

Marlers Farm

Along New Road there is a 19th century house on the south side gable end to the street. A simple dwelling, rendered with modern casement windows, but very prominent thick overhanging bargeboards. Moving east along New Road there is thick tree planting on either side of the road, and there is no indication that there is another part of the settlement. Passing along the road there are views to the south east towards the Norman round church tower across the former parkland area.

Lower Street

The church is the oldest building within the area and stands out as a local landmark. The church, village pub and community centre are all focal points for the local area. The church stands out in approach view along Rectory Road, which has thick landscaping on the south side, but open views to the north. To the south of the church is a bowling green.

As well as the Norman-style stone carvings, there is another early feature on the main external fabric of the nave: the scratch (or mass) dial. It's located on the left side of the south doorway at about eye-level height. It shows a large hole in the centre and sixteen small holes circling below. A metal or wooden peg (a 'gnomon') was inserted in the central hole so that, if the sun was shining, a shadow was cast as a line that would give an indication of the time of day. This was a helpful guide for the priest so that he could tell when he needed to be ready to take the next service. It was called a mass dial after the word 'mass' meaning a church service.

From the west the first house is the converted Georgian chapel. Hedgerows provide a rural boundary treatment but gravestones and memorials can be glimpsed through the gaps. On the east side is the c19 red brick of the former village shop – with the shop front preserved below and the first floor surmounted by a crow stepped gable. The church provides a focal point on the other side of the small triangular green, with an unceremonious telegraph pole in the centre of it. There is a pleasant group of render coated cottages to the north – now divided into three cottages – with steep slate roof and casement windows in a cruciform style. Formerly one large, probably early 18th century, house.

8 Gissing Conservation Area Character Appraisal – July 2021







The Old School building /Community Hall

Adjacent to these cottages to the north is the Crown Public House, altered in the 1925 with a thick coating of roughcast render, and also now having modern style casement windows. Crown Cottage is a smaller more traditional adjoining cottage also in render. There is a new development of rendered cottages to the north east, with traditional form and scale and therefore fitting in quite harmoniously.

To the east is the former Board School and School House dating from 1875, typically in Victorian period revival style, steep roofs of slate and ridge tiles with bargeboards. A new extension was built for the community centre in 2017 on the east side with grey weatherboarding as a contrast. To the south of the community building is a K6 telephone box. This was relocated from Wash Lane.

On the corner of Rectory Road is a simple red brick cottage with central stack and dark pantiles called The Lodge. This is actually later brick 19th red brickwork encasing an earlier timber frame construction.

Area around moated site of Former Hall

This is essentially now an area of rural agricultural landscape, but with the remains of the tree belt plantations dating from the former parkland setting of the former hall, and the double moated site of the hall now also covered in thick vegetation. The existing farm complex has been converted into housing.

The farm buildings are approached along a drive and are red brick, dating from the 17th with some later 18th century work. There is also the survival of one bay of a 17th century house. The main barn has an unusual cranked queen post jointed to the tie which is an unusual feature of note. A historic building report on the barns from June 2008 can be found at the Heritage Environment Record or planning application 2008/0755.

Traditional Materials & Architectural Details

The materials of the buildings in the Gissing Conservation Area are typical of this part of Norfolk and are displayed in the fabric of the buildings using techniques traditional to the area.

The majority of buildings in the Conservation Area have rendered walls with a variety of colour washes. Two houses have remains of pargetting.

Plain red brick walls appear in 19th century buildings, notably the Hall, the School and school house and as a facade material upon an older front wall at nos. 28 and 29 Upper Street. Norfolk red brick also appears in Lower Street as the walling material on the former shop opposite the Wesleyan chapel and as the facade of the early 19th century cottage at the Tivetshall turning.

The surviving farm buildings on the Old Hall site, now converted, are also of soft red brick. The estate cottage at the western extremity of the Conservation Area in Chequers Lane is also built of soft reds.

There are two notable buildings that are the exception in terms of their different walling material. The church has different types of flintwork showing the development of this typical South Norfolk material from the 11th to the 19th century. In Upper Street next to the Bakery is a timber clad weatherboarded outhouse rising from a brick base

Most of the roofs are clay pantiled, a majority of them with black smut and glazed tiles. In some cases a mixture of red and black tiles occurs and one roof and there are examples of contrasting red and black sections of roof in the same building.

The church is unusually tiled with red plain tiles while close by the school and schoolhouse are roofed with large Welsh slates. Plain tiles can pre-date the arrival of pantiles, although in this case they are likely to have been put on as part of the 19th century restoration. Welsh slate is also usually a later 19th 'import' following better transport connections used for the row of early 18th century cottages next to the Crown and the Wesleyan chapel further along Lower Street. At Upper Street Gissing Hall is also Welsh slated. Also, at Upper Street the Chequers is thatched with a decorative scalloped ridge.



Pargetting at 40 Upper Street



Pastel colour render, steep pitched roof and later C19th bargeboards at the Crown



Weatherboarding outbuilding at the Old Bakery in Upper Street

Natural Character



The approach to Upper Street from west

The natural character is important to retaining the rural character of the village. Building are set amongst trees and hedges with village paddocks to the edge.

The conservation area contains several tree plantations to the south which are the remains of the former parkland to the old hall. These are remnants of the former parkland landscape, although the enclosed parkland is now farmland and no longer recognisable.

Street Furniture, Walls and Railings



Church gates with '1950' date



Railings at Chequers

Being a relatively small village and very rural in character there is little street furniture.

A K6 telephone box was moved from its original position on Wash Lane to south of the community centre in 2018.

The listed war memorial is in the south west corner of the churchyard facing toward the road.

There are interesting railings around the church from different dates. Also, some railings to the front of Chequers on Upper Street.

Conservation Management Guidelines

Highways



Informal rural character to the streets

The character of the village is very informal and rural, and although pavements can offer safety benefits they can also 'urbanise' informal rural streets.

Verges should be kept informal. Careful consideration needs to be given to footpath materials.

Upgrading Windows and Doors



Modern windows can be replaced with more traditional original style

In some cases windows and doors have been replaced with different materials such as uPVC and/or different styles.

If door or window frames need to be replaced they should ideally be replaced with the original style of windows and materials. The opportunity should be taken to reinstate traditional style windows where they have been unsympathetically replaced in the past.

Painting/colour washing buildings



The Old post office

A number of properties within the conservation area are timber framed and rendered. Although there is a variety of colours, the colours chosen are generally whites or pastels to match historic limewash and well chosen.

Colours should be well chosen to match historic limewash colours.

Appendix 1 (i)

Listed Buildings

Burston Road Barn approximately 50m east, south east of Old Hall Barn and Cowhouse

east of Old Hall.

Lower Street Nos. 52, 53 & 54 Crown Hill Cottages

Church of St. Mary (Grade I)

Crown Public House Crown Cottage

Upper Street Nos. 26 & 27, 28 & 29, 33 & 34, 40 & 41, 42

Stables south of No.41

Gissing Hall The Cottage Broomfield House The Chequers

Appendix 1 (ii)

Unlisted Buildings of townscape significance

Chequers Lane Firs Cottage

Lower Street Former school and school house

Old Chapel House

The Lodge

Upper Street Former stables and barns to Gissing Hall

White Lodge

No.31, outbuilding north of The Cottage

Outbuilding to the former Bakery

Policy background

In recent years, the approach to conservation area designation has changed considerably. It is now recognised that development plan policies, development control decisions, and proposals for the preservation or enhancement and the management of conservation areas, can best be achieved when there is a sound understanding of the special interest of the conservation area.

This position is reinforced as follows:

The Planning (Listed Buildings and Conservation Areas) Act 1990 in section 66(1) makes it a duty of local authorities when considering applications to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest.

Under section 72 of the same Act, it is a duty with respect to any buildings or land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

Department for Communities and Local Government. National Planning Policy Framework (NPPF) 2018 Paragraphs 184 to 202 cover "Conserving and enhancing the historic environment".

Joint Core Strategy- Policy 2: Promoting Good design South Norfolk Local Plan

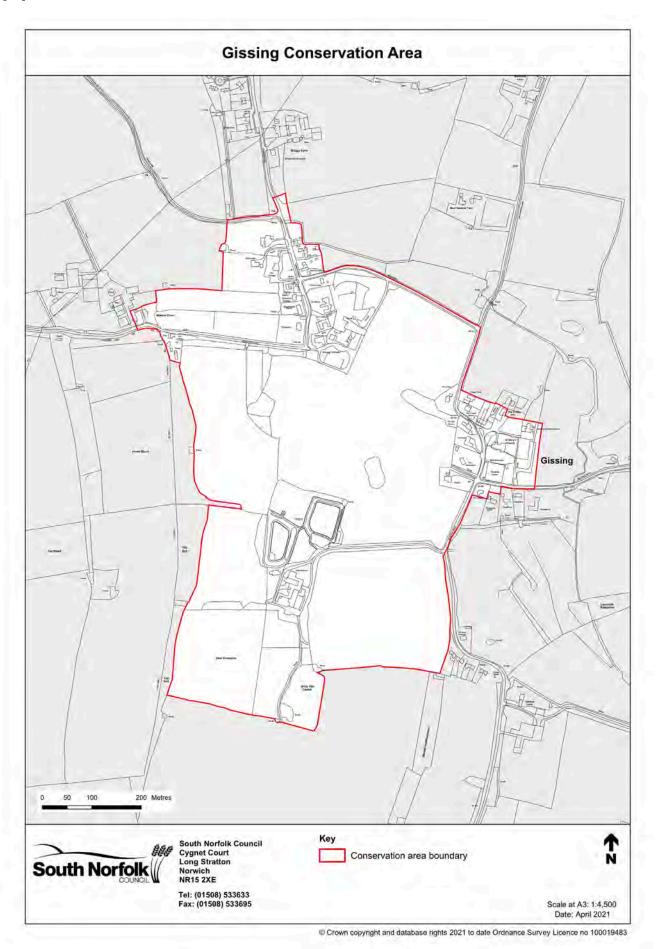
The South Norfolk Local Plan Development Management Policies Document was adopted in 2015 and policy 4.10 covers Heritage Assets.

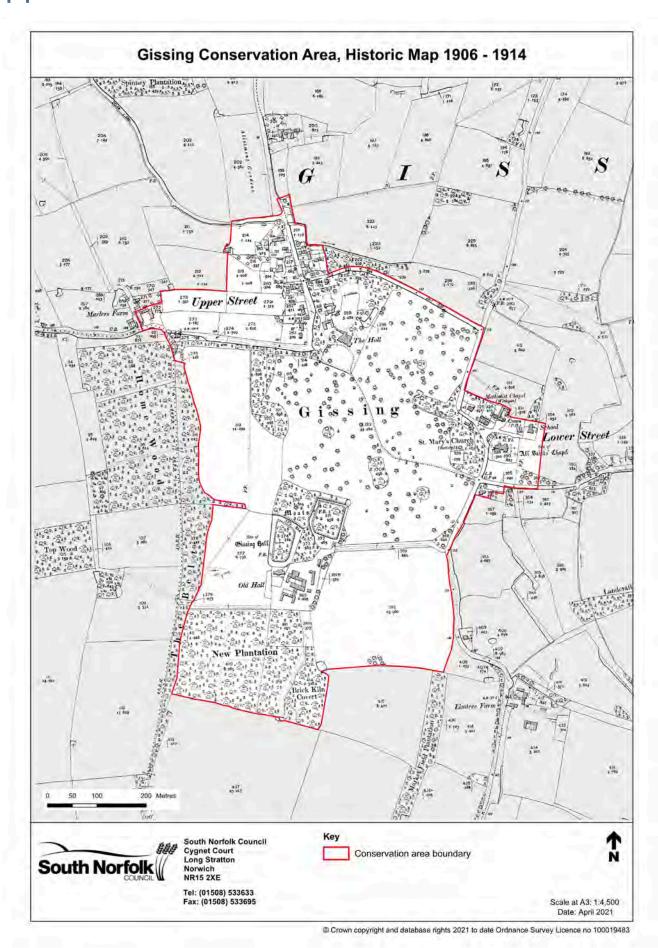
Public Consultation

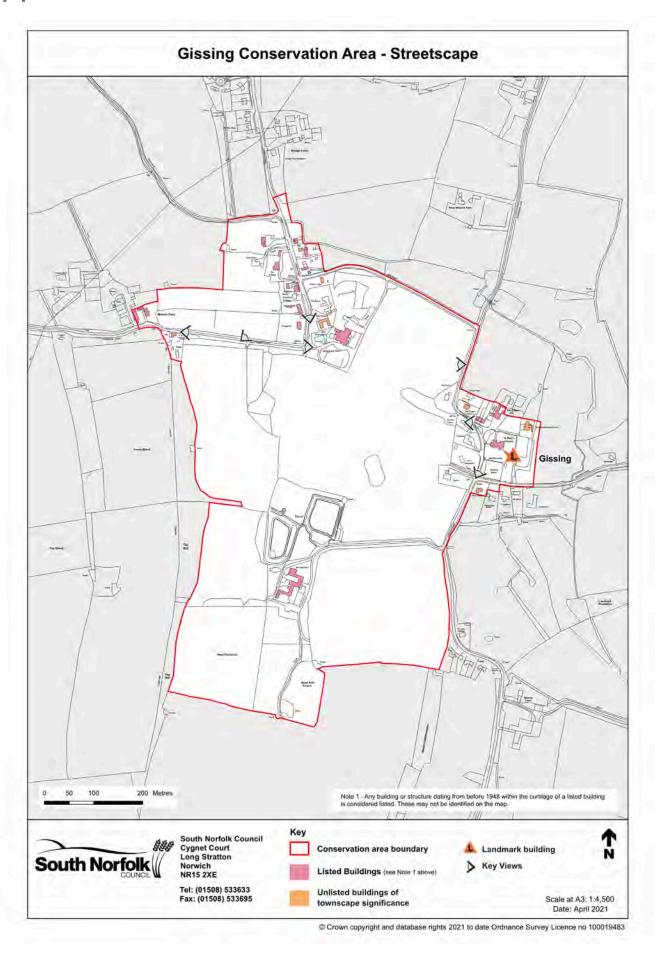
An informal 'walkabout' of the area was organised with the Parish Council on 3rd March 2020. This informed the proposed boundary changes and the conservation management guidelines within the draft appraisal. The public consultation on the draft appraisal took place from 15th February to 15th March 2021, with attendance at the parish meeting on 9th March 2021. Due to the Covid-19 Lockdown regulations the public meeting was carried out through virtual attendance at the parish council meeting online. The consultation and parish council meeting were advertised through:

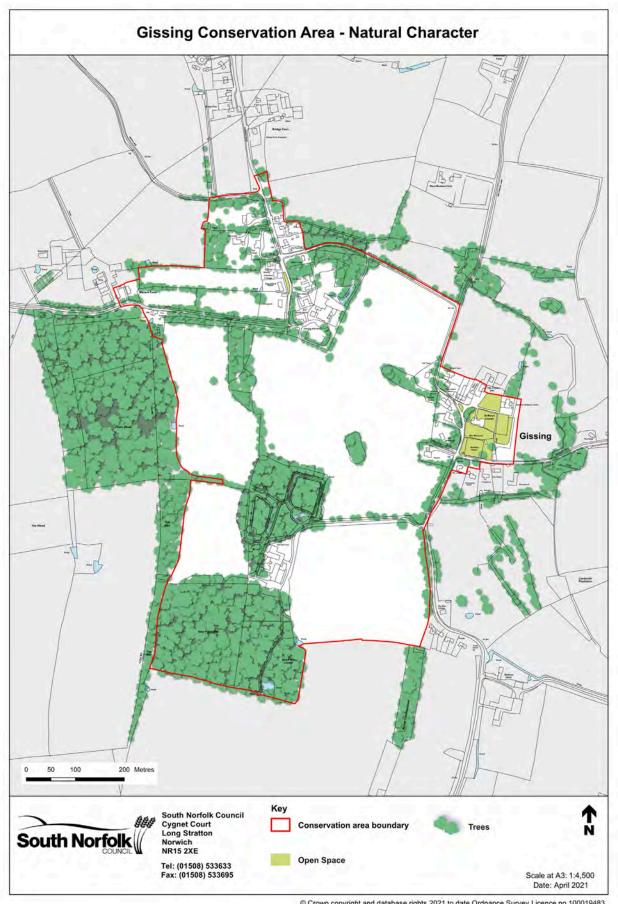
- An advert in village notice board and local publicity by the parish council
- The draft appraisal being available to view on the council's website.
- Emailing Ward Councillors, County Councillors, the Parish Council and Historic England.
- Contacting residents directly affected by the proposed boundary changes by letter informing them of the consequences of being included in the conservation area.

As a result of the consultation some minor corrections were made to the appraisal with the revised boundary remaining as proposed in the draft.











Thorpe Abbotts

Conservation Area Character Appraisal and Management Guidelines

July 2021









Content

Introduction	3
Historical Development	4
Character Assessment	4
Conservation Management Guidelines	14
Appendix 1(i) - Listed Buildings in Thorpe Abbotts Conservation Area	16
Appendix 1(ii) - Unlisted Buildings in Thorpe Abbotts which are of townscape significance	16
Appendix 2 - Policy & Consultation	17
Appendix 3 - Conservation Area Boundary	18
Appendix 4 - Historic Map	19
Appendix 5 - Streetscape	20
Appendix 6 - Natural Character	21

Introduction



Typical red brick estate house

Thorpe Abbotts is a small rural settlement, much of its character defined by its former estate housing. The form of the hamlet is that of a three-armed settlement, with the green marking its centre. Buildings mostly date from the 19th century and despite more recent development, the overall appearance is that of a Victorian estate village. It has a number of listed buildings, which interestingly are distributed at both the extremities of the conservation area and at its centre.

Under the terms of Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is required to identify areas of special architectural or historic interest whose character or appearance it is desirable to preserve or enhance, and to designate them as a Conservation Area. The Thorpe Abbotts Conservation Area was first designated in 1994. The 1990 Act also requires local authorities to prepare management guidance and proposals for Conservation Areas. This document should be read in conjunction with the adopted Local Plan, the National Planning Policy Framework and Planning Practice Guidance.

Key Characteristics

- Victorian estate village defined by modest sized red brick cottages/houses
- Hierarchy of estate houses
- Strong natural character provided by mature trees, hedgerows
- Wide grass verges either side of the road
- Dense woodland areas to the southeast and northwest

Historical Development (also see historic map in Appendix 4 p19)

The name 'Thorpe Abbotts' is reference to it being a secondary settlement or hamlet belonging to the abbots of Bury St Edmund. The primary settlement may be taken as nearby Brockdish, which remains the more dominant of the two villages. Thorpe Abbotts itself has developed as two separate smaller settlements; one around the church, outside the conservation area to the southwest and the other, the subject of this document, a hamlet north east of the church, at the junction of three roads.

The 1823 map shows Thorpe Abbotts (the settlement) was around the Church. There was a medieval Chapter House on the site of the current Thorpe Hall which was built in 1701. During the late 18th and early 19th centuries the village was referred to as Thorpe Cornwallis after the Cornwallis of Brome family who owned the Estate at this time. The 1840 plans for the Rectory use this name.

In the early nineteenth century the population of the parish was 281. During this period the land was divided between two major landowners. The lord of the manor at this time was the Rev. E. Holland and the second landowner the wife of Edward Bridgman, Esq. the owner of the Hall estate.

Enclosure of the village lands took place in 1803 and at that time 42 acres of land was awarded to the lord of the manor, subject to a yearly payment of £5 for distribution in coals among the poor". Enclosure is often seen as an oppressive process but here is evidence of at least a token of collective parish responsibility for the destitute. An older, anonymous donation of land already produced a yearly rent of £4 which was "carried to the poor rates."

These changes in land management in the early 19th century were accompanied by new building, most notably by the Rev. K. Wallace B. A., who had "lately built a neat parsonage house." A tradition of parsons of substance was well established in this part of Norfolk as the lord of the manor at the time testified.

The statistical account of 1845 does not record many other persons of substance, instead a small community supported a single wheelwright, the landlord of the one pub and six farmers. We may suppose that the remainder of the population were employed on the land or associated work, as no other commercial activity is recorded.

The part of the village identified as the conservation area reflects the earlier estate village, established from the late 18th century, although there are a number of surviving much earlier buildings.

Character Assessment

(Also see Streetscape and Natural Character Maps in Appendices 5 and 6 pages 20 and 21)

Thorpe Abbotts and its setting

Looking at the landscape setting of Thorpe Abbotts, to the south and east it is largely characterised by several kinds of planted woodland, whilst to the west and north the character is defined by hedged fields of varying size with hedgerow trees enclosing the conservation area. The land around the settlement is part of the plateau north of the Waveney Valley and is level with no noticeable contours. As with other settlements on the plateau there are many ponds. A water course flows off the airfield passing through the wood and under Mill Road south of Locks Pyghtle. It then joins the stream going through Brockdish and on to the Waveney.

The southern edge of the conservation area is bordered by parkland trees which dominate in views either side of The Street along the eastern approach. The tall parkland trees are clearly visible from the green at the centre of the conservation area and create the sense of a settlement in the shadow of a great house. Thorpe Abbots Place and its adjacent park have played this role since the creation of the hamlet.



Parkland trees in glimpsed views at southern end of the boundary

By contrast, Mill Road is much less enclosed with occasional trees within the individual gardens and the sight of hedgerow trees behind the properties. Here the views are more open along the road. The view north along Mill Road is closed by a clump of trees set around one of the several ponds, which dot the landscape around the settlement.

Conservation Area Boundary

Most of the conservation area boundary follows the rear garden boundaries of dwellings. Starting at the southwest corner of the conservation area at The Street, the boundary follows the roadside northwards to the village hall where it then continues north behind the hall following the field boundary and then along the garden boundaries of properties on the west side of Mill Road. It then follows the line of woodland, before finally skirting the boundary of part of The Homestead, an addition to the conservation area, before going eastward and then south along the rear garden boundaries of Mill Road. It then extends east just north of The Green along rear gardens of houses in The Street after which it encloses a large area of pasture and the southern half of Home Farm. From Home Farm the boundary goes south along Mormor Lane from which it then crosses Grove Road and goes west following the drainage ditch and enclosing Thorpe Abbotts Place. It then skirts the south boundaries of three dwellings that were formerly Highfields Farm before finally reaching The Street at the far southwest corner.

Street Patterns and Historic grain

Historically the settlement has developed in three separate areas; at Thorpe Abbotts Place, either side of the green at the village centre and at the north end of Mill Road. The pattern of development is a loose linear form extending from the green, with other parts of the settlement being groups of buildings set back from the road. These three main areas of the earlier settlement were originally separated by fields and woodland but infill development in the 20th century has continued the linear development pattern extending from the green although an open field with overgrown hedgerows and small trees still separates the settlement at the west side of Mill Road. The size of infill dwellings is generally in keeping with the modest scale of earlier dwellings, which allows them to sit comfortably in the street scene.

Perambulation

The buildings of the conservation area have a remarkable consistency of scale and type, despite differences of date, detail and to some limited extent, size. Their materials also vary but not so much as to disrupt an otherwise generally coherent architectural character. The streetscape of the conservation area is thus low key and consistently rural. This uniformity of character is the result of the settlement being mostly an estate village, with few of the original house types and only minor variations among those.

As the observer approaches from the southwest, the water pump and its shelter become visible on the green as the focal point of the settlement. On each side of the road the cottages and later Victorian houses, though of different materials and sizes, are respectful of each other and no single building dominates. Instead the trees form the largest objects in view and hold the composition. The small scale of the central shelter reflects the modesty of the character of the hamlet. Views of the green at the centre are framed by the mature hedges, cottages and trees of their gardens. The gentle curve of the road southeast and southwest of the green prevent longer views whereas there is a clear vista looking northward up Mill Road.

The predominant building type is the estate cottage and the evolution of this important Norfolk building type in the village is evident over a period of more than one hundred years. The listed buildings in the conservation area form a group which is less characteristic of the place as a whole than is usual in rural villages. This is because unlike the majority of the buildings they are either singular (as the pump shelter), or of 'important status' (as the farmhouses of different dates.) Of the six listed dwellings in the conservation area, three are 17th century timber frame houses: Lock's Pyghtle near to the north boundary being the earliest; another house is of 19th century date, with the remaining two listed structures being an 18th century wall and the village water pump on the green. Fadens map of 1797 indicates a number of houses Locks Pyghtle, Cringle Cottage, houses in the wood south of Locks Pyghtle (no longer in existence), Keepers Cottage and Highfields Farmhouse. The map also indicates a larger house near the pump which might have been the (Red) Lion Public House.

Mill Road

Lock's Pyghtle is a timber framed house of modest size but an example of a dwelling originally belonging to an owner of substance for the period. Opposite the copse south of Lock's Pyghtle stand two relatively recent houses designed carefully within the local vernacular tradition of rendered walls beneath a low-pitched tiled roof and two-light casement windows. These make a positive contribution to the conservation area. A rather more modern detached brick house then stands adjacent but is more set back from road and is of a general traditional design.



Looking northwards up Mill Road from the South West



The approach to the green from the East



Lock's Pyghtle - the oldest building in the Conservation Area



The listed boundary wall at Highfields Farmhouse

Next on this eastern side of Mill Road are a former pair of estate cottages, now one house. After these are two modern bungalows and then what originally appears to have been earlier cottages, possibly in clay lump, that now form a single dwelling. Cringle Cottage here is of Clay Lump construction with a brick outer skin probably done by William Valliant the Landlord of the Lion and the local Bricklayer. There is an inscription "John Valliant 1880" on the West gable end, referring to his son who would have been a boy at the time, perhaps helping his father.

It is sensible to assume that these represented the first type of estate cottage built in the settlement. Going further south continuing the east side is the much later infill development around a loose courtyard area. The close form hedging and wide grass verges at this part of Mill Road at the east side help to blend in the development with the remaining natural landscape opposite. The infill houses are of two storeys and respect the scale of the rest of the hamlet. They are built of brick, the larger detached dwelling with square hipped roof having a rendered finish. Roofs are red clay pantiles and windows simple traditional style casements. Next is a pyramidal roofed bungalow that has been remodelled, its form marking the point of transition in the road between the more recent loose courtyard layout and the older traditional row of houses to the south side, the latter including Rosary Cottage, an attractive early 19th century "cottage ornee" style with decorative bargeboards.

Rosary Cottage was in fact built as an Almshouse and used to have three front doors of a similar design to that which is there today. The roof ridge line still indicates where there would have been a second chimney stack. The conversion into a single dwelling was during the 1970s when most of the estate houses were sold off.

Continuing southward on this east side are two pairs of estate red brick cottages with central chimney stacks. The first pair have been extended either side. After the cottages is an area of rough grass land which corners the central green together with the adjacent well-maintained garden of an estate cottage at the entrance to The Street. The rough grassland is part screened by boundary vegetation but does add to the rural character towards the centre of the village.

Looking at the west side of Mill Road, there are Victorian estate cottages together with 20th century houses of the same scale and form. The later houses have been designed to give a similar appearance to the earlier pairs of cottages, but their detailing is not of the same quality, although they generally sit comfortably in the overall street scene. At this side close to the road there is a red K6 telephone box and its accompanying post box on its black iron post, both providing a visual focus in views looking north from the green.



Pair of estate cottages, Mill Road



Rosary Cottage built in the early 19th century "cottage ornee" style



Rough grassland to side of green



Estate cottage with similar style new build to left

The Green

The townscape of the whole hamlet is focused upon the green and its pump shelter at the centre. Opposite the green to the south side is a high thorn hedge which conceals Keeper's Cottage. This is a grade II listed 17th century house with 19th century Gothic style windows. A traditional wrought iron gate within the hedge allows a glimpse of the cottage, which is backed by large mature pine, oak and beech trees to the south which form part of the tree belt of the park of Thorpe Abbotts Place. These parkland trees rise well above Keeper's Cottage and are an important backdrop enclosing the settlement.

Other Victorian estate dwellings at the green are a pair of cottages 5 & 6 The Street immediately to the east side, and Lion House, a larger detached dwelling at the entrance to The Street from the southwest. The latter is an important character building that is prominent in the conservation area. Lion House dates from the mid 1800's and was built as a public house, replacing an earlier building in same use. The earliest record comes in 1826 from the Earsham License Registers which indicates at the time it was owned by the Harleston Brewery. It is interesting looking at the building which had a Bricklayer (William Valliant) as its licensee who may well have been involved in its construction with the style being replicated in all of the estate houses which were built 1880-1906. Number 23 was the last house to be built and was referred to as "the New House",

Historically the Pub was referred to as the Red Lion (Bryant's 1826 map) but at some stage became the Lion. The house and its outbuilding have black glazed pantiles which are a pleasing contrast with the red brickwork and make the building stand out. There is a gravel front courtyard in front which is separated from the road by new railings recently installed in a traditional style.



Keepers Cottage



Lion House



The Pump Shelter

The pump shelter on the green is dated by an inscription to 1867 and the simplicity of its design suggests an 18th century origin. The Pump was the village water supply until mains water arrived in 1954.

The simple oak post hexagonal plan construction with its peg tile low pitch roof adds much to the historic character at the centre of the conservation area. The small green around the shelter is short cut grass, whilst underneath York stone provides a base for the central post of the shelter and for the pump itself. The traditional wooden benches and adjacent mature lime tree and horse chestnut trees do not cramp the shelter but add further interest, providing an attractive immediate setting for the building.

The Street (East)

Trees dominate either side of the road along the eastern approach, closing off views. Where Grove Road turns into The Street, they line the highway on either side behind wide grass verges and neatly cut low thorn hedges, giving the impression of a right of way inside a landscape park. This impression of a consciously designed landscape is heightened at this point by the curious arrangement of a pair of perfectly circular tree clumps standing in open paddock to the north side of the road. Once the conservation area boundary is crossed, the vista reveals no buildings, the parkland described above being the dominant feature. The lane, which has been gently sinuous up to this point, becomes straight and the prospect of a settlement is anticipated.

The first indication of this to the north side where the outbuildings of the Home Farm can be seen, past which is the main farmhouse, clearly visible from the road. At the end of the vista between the trees, the first glimpse of the hamlet can be seen. The first houses on the right are what appear to have originally been a pair of brick estate cottages, as seen elsewhere, but these have been rendered and the pantile roof replaced with dark plain tiles. The cottage to the east side has been extended. The house is a little closer to the road than those beyond and this together with its white finish makes it more dominant in street views. Despite later alterations the building still retains a strong traditional character.



Pheasant Cottage



Rendered estate houses with more recent builds to left



Boundary wall at Highfield House



The village hall and village sign

Beyond this on the north side of the road are three quite recent new houses, which generally conform to the type described above in Mill Road, having low pitched roofs with bargeboards, traditional style casement windows, brick and rendered finishes with clay pantile roofs. They make a quiet positive contribution to the streetscape at this point.

The next notable building is on the left, a rendered two storey dwelling, Pheasant Cottage, which has a traditional pantile roof, off-set gabled porch and three light casement windows. This clay lump cottage was originally three dwellings. It has an attractive paling fence close to its frontage. At this point in the road, which narrows slightly, the centre of the settlement starts to come into view.

The next house on the left is a slightly smaller, the Old Post Office, which appears to be a clay lump building that has been clad in the recent past with a skin of buff brick, giving the impression of a later date. It is of two low storeys and has a central brick stack. The cottage retains its large clay lump and weather boarded outbuilding which adds much to the historic character of the street scene. This modest group is an important element of traditional streetscape within the conservation area.

The Street (West Side)

Moving from the centre southwest towards Highfield Farmhouse, the road is only partly enclosed either side by mature hedgerows above grass verges. On the left is a recent house of red brick, Highfields Cottage, which is undistinguished in its design although its scale and general appearance respects that of the pairs of brick estate cottages seen elsewhere. Looking back, the curve in the road conceals views of the green.

Continuing on the same side of the road are two new houses, which also have a traditional appearance but are set further back from the road and mostly screened by closely planted trees at the road boundary. In front of the houses is a large gravelled courtyard area which is partly visible from the road. The tree boundary with low timber fence below moves away from the mature front boundary hedgerows which are so characteristic elsewhere in the conservation area. Opposite on the north side of the road are three modern bungalows and then the village hall, all set well back behind a line of mature front boundary hedgerows, which is interrupted by four oak trees.

Next, the village hall's design and construction does not follow that of other buildings and is built of rendered concrete block in a standard military format and dates from 1954. The single hall has a buttressed entrance facade with clasping buttresses at the corners and pressed metal three light windows set symmetrically on either side of the panelled two light door. The flank walls have dwarf buttresses set below six light long pressed metal windows with side opening lights. An outshut on the western side has a low-pitched roof and two light windows. Roofing material is corrugated asbestos and cast-iron rainwater goods drain it. Although not in keeping with the more traditional historic character of the conservation area, the village hall is set well back from the road and in no way detracts from the main character of the area. The village sign at the front boundary close to the road is particularly attractive adding interest to the street scene.

Opposite the village hall at the turn in the road, one of the earliest uses of brick in the conservation area can be seen in the listed boundary brick garden wall of Highfield Farmhouse. This is a typical eighteenth century soft red Norfolk brick with fine gauged joints in lime mortar, a brick plinth and saddle back coping. The brick bond used is of interest, being English bond in the lower part of the wall and Flemish bond in the upper part, suggesting a heightening in the latter part of the century. The wall encloses the road on this southern side and creates a point of townscape interest.

The first sight of the southern entry into the conservation area is of a closely hedged road with grassed verges. Beyond this can be viewed a large number of mature trees within the settlement whilst views of the open countryside to the west side are closed-off by the overgrown hedgerow and closely planted small trees.

Traditional Materials & Architectural Details

The materials of the older buildings within the conservation area are all without exception of local provenance. Even the nineteenth century buildings use lucid brick and dye which may have been brought by rail but appears to have come no further than from Suffolk. Other than oak timber frame, clay would be one of the earliest materials used both for infill in timber frame houses, such as at Lock's Pyghtle, and later for clay lump block as can be seen in the outbuilding at No.26 The Street.

Reed thatch for the earlier dwellings would have been readily available from the river washes of the Waveney. Wheat straw may also have been used as it would have been more readily available on the farming plateau north and west of Thorpe Abbotts. Lock's Pyghtle is the only surviving thatched building.

Other materials are traditional Norfolk soft red brick and clay pantiles, which can be seen on most of the estate houses, with brick being first used for the 18th century boundary wall at Highfield Farmhouse

Specially moulded bricks have been used to create hood mould details above doors and windows on estate houses together with fine gauged brick heads. Raised brick pilasters with capitals can also be seen on a number of the estate houses

Other than some decorative barge boards, Gothic style windows on Keepers Cottage and the large chimneys with decorative moulded details on the estate houses, there are few other architectural details of note.

The 1950's village hall, with its functional military style design is the only building that really stands out in contrast to the more traditional historic architecture in the conservation area.



Clay lump outbuilding in The Street



Tall chimney stack as seen on most of the estate cottages.



Hood moulds and decorative bargeboards at Lion House

Natural Character



Trees and hedgerows dominate many street views

The strong natural character of the conservation area is defined by both open parkland and woodland with natural grass verges, mature hedgerows and trees dominating many views. There are glimpses of the wider countryside beyond in some views between properties. At the east side of the conservation area is the parkland of Thorpe Abbotts Place and opposite this to the north side, the parkland of Home Farm, both with areas of dense woodland. The other much smaller area of woodland is at the north end of Mill Road.

Street Furniture, Walls and Railings

There is not a large amount of street furniture but the following are of note: weather vane and three wooden benches at the pump shelter on the green; the traditional highways sign post opposite the green with its cast iron crest; the village sign; the K6 telephone box and its accompanying post box along Mill Road which are both of tested quality and durability.

Whilst the majority of the front boundaries of dwellings are mature hedgerows, where there is fencing, this is mostly tradition pale fencing which is appropriate for the traditional character of the area. There is some square trellis fencing along Mill Road and also a large close boarded fence fronting the road at Thorpe Abbotts Place, which rather detracts from the rural character of the street scene.

There are one or two relatively recent sections of brick boundary wall along the road but of most interest is the boundary wall at Highfield Farmhouse, as previously referred to. There is relatively new set of metal railings in a traditional style in front of Lion House opposite the green.



K6 telephone box and post box

Conservation Management Guidelines

Highways



Other than one or two speed signs, reflective plastic bollards at The Street (east side) and the traditional mid-20th century road sign opposite the green, there are no other highways signs in the conservation area. Roads have natural grass verges which are very much part of the rural character of the settlement.

The lack of highways signage helps to retain the traditional rural character of the conservation area and therefore any new signage should be kept to a minimum. The use of road kerbs should be avoided as these will only detract from the rural character. Small timber posts fixed at intervals can sometimes be a more sympathetic alternative.

Upgrading Windows and Doors



In some cases original timber windows and doors on traditional buildings have been replaced with different materials and/or different styles. If original doors or windows need to be replaced, they should ideally be replaced to match. However, if different materials are chosen then the window style should match the original design.

Where windows/doors have been unsympathetically replaced in the past then the opportunity should be taken to reinstate traditional windows with more correct proportions.

Ground Surfacing



All road surfacing is tarmacadam between natural grass verges and nearly all driveways have a natural gravel finish.

The use of more modern surface materials such as paviors on driveways should be avoided as this will have a detrimental impact on the character of the conservation area.

Front boundaries



An important part of the character of the conservation area is defined by the line of mature hedgerows along the front boundaries of properties.

Whilst fencing has been used for a small number of boundaries every effort should be made to retain hedgerow boundaries, which form such an important part of the character of the conservation area.

Painting/colour washing buildings



The majority of buildings in the conservation area have a natural brick finish although painted render can be seen on a few buildings.

Careful consideration should be given to paint colours to ensure the visual harmony of buildings in the village is retained.

Appendix 1 (i)

Listed Buildings (All Grade II, except as noted)

The Street (east side) Home Farmhouse.

The Street – (west side) Highfield Farmhouse

Boundary wall to Highfield Farmhouse

The Green Keepers Cottage (formerly Yew Tree Cottage).

Village pump and shelter.

Mill Road Locks Pyghtle

Appendix 1 (ii)

Unlisted Buildings of townscape significance

Mill Road Clay lump barn at The Homestead

Wildwood

Cringle Cottage

K6 Telephone kiosk & post box

Oak Lodge Rose Cottage The Willows

Numbers 8, 12,12a,14, 23

The Street (East) 1 & 2 Thorpe Abbotts Place

Outbuilding close to road at Thorpe Abbotts Place

Pheasant Cottage

Numbers 5, 6, 24, 25, 26 Clay lump outbuilding at 26

The Street (West) Village Hall and sign

The Green Lion House and its outbuilding

Policy background

In recent years, the approach to conservation area designation has changed considerably. It is now recognised that development plan policies, development control decisions, and proposals for the preservation or enhancement and the management of conservation areas, can best be achieved when there is a sound understanding of the special interest of the conservation area.

This position is reinforced as follows:

The Planning (Listed Buildings and Conservation Areas) Act 1990 in section 66(1) makes it a duty of local authorities when considering applications to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest.

Under section 72 of the same Act, it is a duty with respect to any buildings or land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

Department for Communities and Local Government. National Planning Policy Framework (NPPF) 2018 Paragraphs 184 to 202 cover "Conserving and enhancing the historic environment".

Joint Core Strategy- Policy 2: Promoting Good design

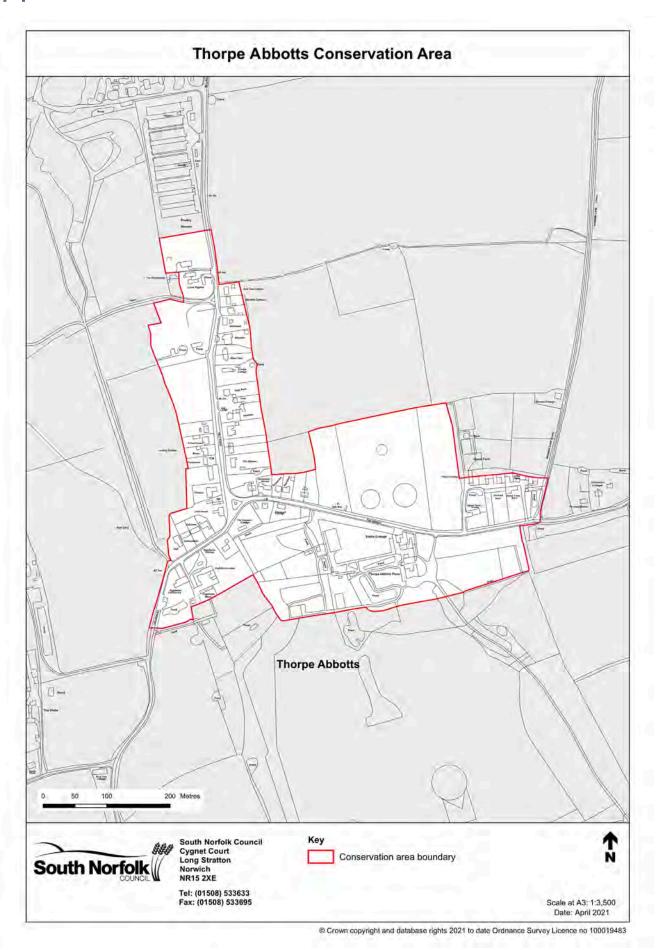
The South Norfolk Local Plan Development Management Policies Document was adopted in 2015 and policy 4.10 covers Heritage Assets.

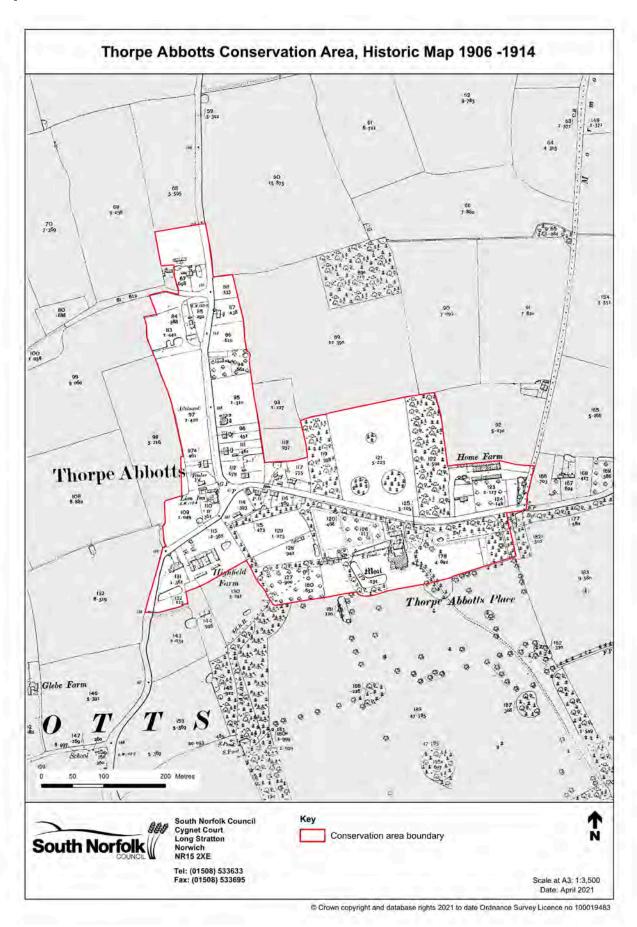
Public Consultation

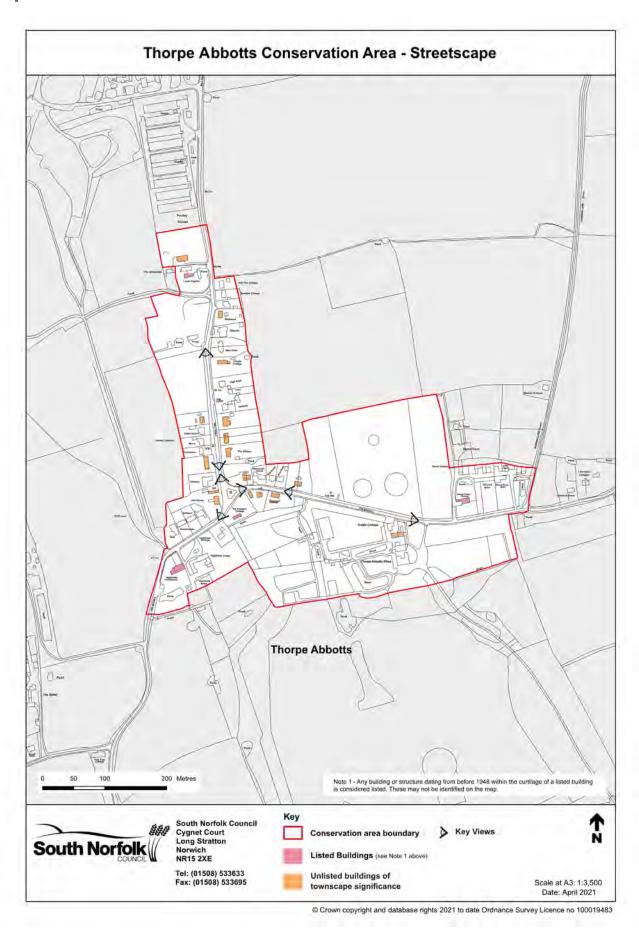
An informal 'walkabout' of the area was organised with the Parish Council on 20th February 2020. This informed the proposed boundary changes and the conservation management guidelines within the draft appraisal. The public consultation on the draft appraisal took place from 15th February to 15th March 2021, with attendance at the parish meeting on 23rd February. Due to the Covid-19 Lockdown regulations the public meeting was carried out through virtual attendance at the parish council meeting online. The consultation and parish council meeting were advertised through:

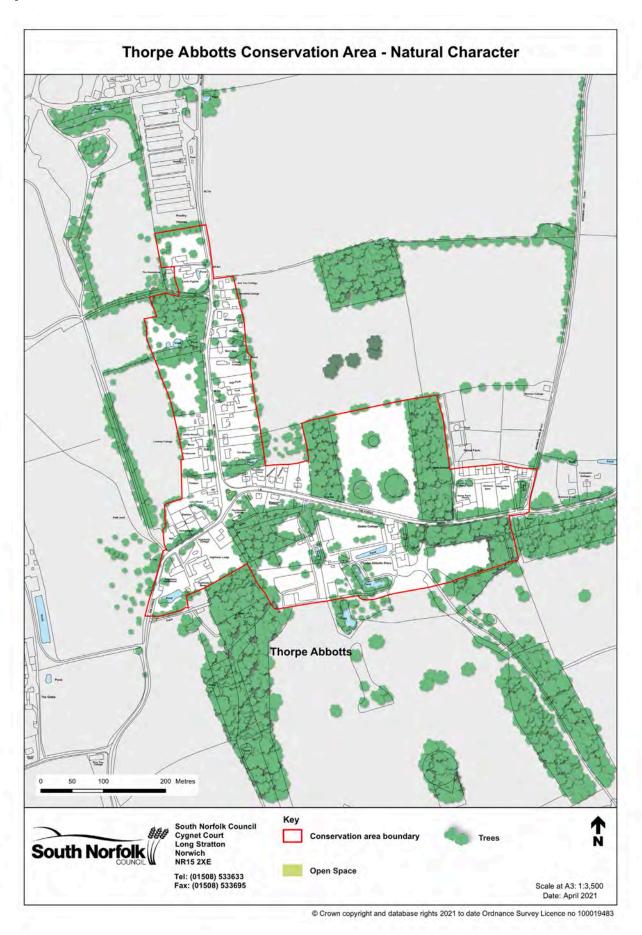
- An advert in village notice board and local publicity by the parish council
- The draft appraisal being available to view on the council's website.
- Emailing Ward Councillors, County Councillors, the Parish Council and Historic England.
- Contacting residents directly affected by the proposed boundary changes by letter informing them of the consequences of being included in the conservation area.

As a result of the consultation corrections were made to the appraisal, however the boundary changes remain the same as outlined in the consultation draft.











Winfarthing

Conservation Area Character Appraisal and Management Guidelines

July 2021









Content

Introduction	3
Historical Development	4
Character Assessment	5
Conservation Management Guidelines	12
Appendix 1(i) - Listed Buildings in Winfarthing Conservation Area	14
Appendix 1(ii) - Unlisted Buildings in Winfarthing which are of townscape significance	14
Appendix 2 - Policy & Consultation	15
Appendix 3 - Conservation Area Boundary	16
Appendix 4 - Historic Map	17
Appendix 5 - Streetscape	18
Appendix 6 - Natural Character	19

Introduction



The village sign

The village of Winfarthing follows the B1077 about 4 miles north of Diss. The conservation area covers a short section of the centre of the village on both sides of the road.

Under the terms of Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is required to identify areas of special architectural or historic interest whose character or appearance it is desirable to preserve or enhance, and to designate them as a Conservation Area. The 1990 Act also requires local authorities to prepare management guidance and proposals for Conservation Areas. Winfarthing conservation area was originally designated in 1994. This document should be read in conjunction with the adopted Local Plan, the National Planning Policy Framework and Planning Practice Guidance.

Key Characteristics

- Significant historic buildings in key positions
- Positive contribution of trees and natural spaces
- Original spaces between historic buildings largely infilled by modern dwellings

Historical Development (also see historic map in Appendix 4 p17)

The name "Winfarthing" could derive from the Danish "Winning" or "Wina" and "forthing", which means a division of land or quarter ie. "Wina's Forthing", and with "ing" meaning son or descendent, the settlement could have been originated by the son of Wineforth. Domesday Book records it as "Wineferthic". Whatever the origins, it seems that Winfarthing is the only place in England having that name. Domesday Book records that the settlement was one league long and half a league wide and was of some importance, being the centre of the Winfarthing Hundred. The Area was heavily wooded and in the 11th century was considered to be the prime woodland in Norfolk. One particular tree, known as the "Winfarthing Oak" grew near Park Farm and was reportedly 700 years old when it blew down in a gale in 1930. The importance of the village continued into the 16th Century when in 1593, the inhabitants secured exemption from certain civil duties and taxes. This was authenticated by Elizabeth 1st.

The heyday for the parish was in the 19th century when the population rose to around 700 and like many others, the village supported a number of craftsmen and traders. A poor house was provided and survives as Guildhall Cottages. The village has three rectories. The first, the Old Rectory, is of early 17th century date. Its successor, now Yew Tree House, was begun in the late 17th century but extensively altered in 1877. The Rector now lives in the modern house to the west of the Church. The school was also built at this time, in 1854, on Glebe Land to the south, accommodating at first over 80 children.

The population of the village has remained much the same for most of the 20th century at around 400. In 2001 the figure was 403, with the latest estimate in 2011 of 503.

Character Assessment

(Also see Streetscape and Natural Character Maps in Appendices 5 and 6 pages 18 and 19)

Winfarthing and its setting

Winfarthing has developed as a linear settlement along the B1077 which runs from Attleborough to Diss .A matrix of unclassified minor roads and footpaths connects the village to its neighbours.

The Parish of Winfarthing includes the minor hamlets of Short Green and Goose Green: an area generally characterised by dispersed farmsteads but whose farmhouses and their associated buildings retain their place in the main streets.

The village is surrounded by large open fields which give distant views along the shallow valley to the south the ground forming the gently rolling northern slopes of the River Waveney. The "edge" between the village and surrounding countryside can be quite dramatic and heightened by trees and hedges.

Conservation Area Boundary

The Conservation area encompasses The Street to generally a single plot depth from the school in the south to Stocks Hill in the north. An expanded area to the east includes the Church and properties to the north.

Some changes have been agreed to reflect changes to property boundaries, to include Tracey's Wood but to exclude part of the field south of the churchyard

Street Patterns and Historic grain

The street pattern, with the subtle curves of The Street and the secluded areas around the Church and Church Lane, helps to create several interesting and varied vistas shaped and enhanced by mature trees, hedges and walls.

The Street is itself a linear development of single plot frontage with a few historic buildings located along its length. Church Lane is more intimate, with an informal group of historic buildings set amongst mature trees and open green spaces.

Significant buildings in the conservation area are scheduled in Appendix 1 and shown on the Map on p18.

Most of the historic buildings are two storey farmhouses and cottages, sometimes with attic rooms. Most are good examples of the building types found in South Norfolk dating from around 17th century and constructed largely of timber framing and render with steep pitched pantiled roofs.

In some cases, historic "out buildings" survive, some now in residential use, which contribute to the general character and help to give depth to the linear settlement.

Perambulation

Church Lane

Church Lane gives access to some noticeable buildings, but the area is dominated by mature trees and hedges.

The boundaries to the churchyard are formed by prominent trees, hedges with a ditch along the lane. The importance of the church, and its churchyard is not therefore, immediately apparent.

But once behind those natural boundaries, the church is impressive, set on higher ground which helps to heighten its impact.

The combination of traditional materials: stone, flint and lead work, with mature trees and natural landscape create a most attractive space.

The gates and railings are of interest.

To the south lies the new rectory set in a heavily treed garden. It has been sensitively designed with a dominant roof but is largely hidden from view.







Church Hill Farm Cottages

The Old Parsonage is a prominent building on the other corner of the lane. It appears to be of generally 19th Century construction although it may contain fabric from an earlier date. It is a large L-shaped building. It has a well- designed wall and railing to the lane. The garden surrounding the house to the north east and west has many mature trees which add significantly to the landscape quality.

The Old Rectory is set back, again shrouded in the trees of its mature garden. The building has been subject to extensions and a separate garage building has been added which complement the character of the building

To the east of the Old Rectory is a grassed track which gives access to "Clerks Cottage" to the north. It is also a public footpath. It is bounded on one side by a pleasant hedge and the charming cottage garden to Church Hill Farm Cottages. These have been carefully restored and with its rendered and timbered walls, is most attractive. The track and footpath end abruptly at Clerk's Cottage, which has been altered in recent times, but the original form still dominates.

The western boundary to this group of buildings is formed by Church Farm. The main barn is now converted to a separate dwelling with its former brick and tiled outbuildings prominent in the views of the lane.

To the north of the land is "Woodsfield" a Georgian style building with an impressive modern extension.

At the junction with The Street is a small village green with the village sign and notice board. The access track leads to the gravelled car park for the school which is screened from The Street by a tall hedge.

The Street - South of Church Lane

Immediately opposite the junction of Church Lane is Church Farm House. This prominent house, of great interest has rendered walls and tiled roofs and closes the vista from Church Lane to The Street. Its eastern boundary to The Street is formed by a low screen wall. Farthing House to the south, is also dominant in the street but its wide access and hard surfaced parking area is unfortunate. The road is usually wide at this point to accommodate the path to the school and lay bye although the hedge on this side is welcomed

6 Winfarthing Conservation Area Character Appraisal – July 2021







Church Farm House

April Cottage, Schoolhouse and Elsey Cottages, with Bradstock House behind, mark the entrance to the area at the south end. Their setting would be improved if their open front gardens were more enclosed by walls/or hedges.

The school itself is set back from the street behind brightly coloured railings and while there has been much alteration and addition to the building, the character of the original building is still strong with its decorative barge boards, gault brick quoining and window dressings.

The playing field to the north provides an attractive green space associated with the school, enclosed on three sides by hedging.

The Street - From Church Farm House to Holly Farm and Stocks Hill.

To the north of Church Farm House lie the associated farmyard buildings, some traditional, in flint and brick, some modern.

The road frontage is provided by a continuation of the low screen wall to the house in flint and brickwork, with the farm access separating the wall with a later version beyond. This contrasts with the fence and hedge opposite.

A run of modern houses now front the street until Guildhall Cottages and The Fighting Cocks Public House which serve to narrow the view in a pleasing manner. The Guildhall has a modest "Dutch" gable on its north wing. Again, the mix of render and pantile and low flint walls pick up the historic character.

The Fighting Cocks public house has a busy forecourt with a low paling fence with a large multipurpose area at the rear.

The next section of the street consists mainly of modern infill development.

Trees/hedgerows still make a positive contribution both along the street as a backdrop behind dwellings on both sides of the road.

The area is terminated to the north by Holly Farm House and Stocks Hill Farm House. Both are in mature gardens with trees and hedges which significantly limits their public impact. Holly Farm House is the only building in the village which has blue/black glazed tiles and is reached by a "causeway bridge" over a "moat". The latter is an extremely attractive feature in the village scene providing as it does a green shadowed area adjacent to the thoroughfare.



View looking along The Street looking south from Fighting Cocks Inn



View to the north of Fighting Cocks Inn

The barn to Holly Farmhouse is now a separate dwelling.

Aside from the tree on the green, the vista to the north features the traditionally designed houses around Diamond Close and the double pair of houses on the west side.

218

Traditional Materials & Architectural Details

Examples of most building materials traditional to South Norfolk can be found within the Conservation Area.

Red/ orange clay pantiles are the prevalent roofing material with only one building having blue/black glazed tiles (Holly Farm House).

Flat modern pantiles are found on Yew Tree House and slates on "Woodsfield", the primary school and the Church.

Most of the 16th century buildings are rendered and painted over either a timber frame (16th or 17th century) or clay lump. Sometimes the buildings have a black painted plinth.

Some colour washed brickwork is found on the Fighting Cocks Public House.

Other buildings are generally in red brickwork with some grey gault brickwork for quoins and window dressings at Yew Tree House, Woodsfield and the Primary School.

Stained weather boarding is found on April Cottage and generally for barge boards and sometimes dormer cheeks.

Flint and stone are only found on St. Marys Church.

Chimneys are an important feature of most of the historic buildings, together with generous overhangs at eaves and gable ends. There are decorative barge boards on the school, and a modest "Dutch" gable on Guildhall Cottage. There is brick detailing on the eaves and gables of The Old Parsonage.



Stud timber framing and render Church Hill Farm Cottages



The Old Parsonage.



Village School

Natural Character



St Mary's Churchyard



Trees at Stocks Hill

The heavily treed area around the Church, Churchyard and Church Lane provides a natural setting for this part of the area. The space opens out to the east of the graveyard. The trees in Tracey's Wood provide an attractive backdrop.

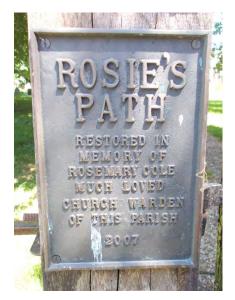
This area also contains some prominent hedging which combined with the grass banks, enhances the rural atmosphere considerably.

To the south of the Church is another significant open space, the School playing field, which is surrounded by mature hedging to the north, east and west where it is a good screen to the car park.

To the north of The Street the mature trees and hedges around the major farmhouses, Holly Tree Farm and Stocks Hill farm contribute greatly to landscape of the area.

The prominent grass ditch in front of Holly Tree Farm is also an attractive feature creating a moat like feel to this area. Grass banks are very much in prominence in this part of the village reinforced by the triangle of grass and the mature tree located at the junction of Hall Road and The Street. The tree naturally terminates the view to the north.

Street Furniture, Walls and Railings



Memorial Sign – Rosie's Plaque



Gates to church

Roads and pavements are generally tarmacadam. Areas of grass are found on road banks and to the open spaces along The Street and Church Lane.

The overhead wire spoil the views.

There is an attractive village sign and notice board on the small village green to the west of the Church. There is a seat and plastic rubbish bin, the view hidden by the hedging to the north and south.

The public house has an attractive "stand alone" sign.

The small triangle of grass at Stocks Hill contains several signs.

Traditional screen walls survive only at Guildhall Cottages and Church Farm, while the new front wall/railing to The Old Parsonage is well designed. The sense of openness to the newer dwellings is noticeable, additional planting of trees, taller hedges, appropriate fencing or walling would have a positive impact.

Conservation Management Guidelines

Highways



The problem of traffic on The Street is perhaps the major physical problem facing the village. Although the road has subtle the speed of vehicles is still a concern.

The location of the school also means that there is heavy traffic congestion at times although this has been eased by the car park and lay bye.

Although verges should be kept informal there may be a need to give some protection to the verge on the west side of the lane.

Upgrading Windows and Doors



In some cases, windows and doors have been replaced with different materials and/or different styles. If original doors or windows need to be replaced, they should ideally be replaced to match. However, if different materials are chosen then the window style should remain the same (if original).

The opportunity should be taken to reinstate traditional styled windows where they have been unsympathetically replaced in the past.

Front boundaries



Most of the front boundaries tend to be hedges and low walls and this is part of the character of the area. Close boarded fences alongside lanes can detract from the rural character of the village

Their retention should be encouraged and any scope for new indigenous planting should be supported, subject to highway considerations.

Painting/colour washing buildings



Some of the buildings are rendered or brick with a light colour pastel finish that sits comfortably with the historic character of the area.

With any redecoration, the colours should be chosen to maintain that pattern.

Appendix 1 (i)

Listed Buildings (All Grade II, except as noted)

Church Lane St Marys Church (Grade 1)

The Old Rectory.

Clerks Cottage.

Church Hill Farm Cottages.

"Woodsfield".

The Street Stocks Hill Farm.

Holly Farm

The Fighting Cocks Public House.

Guildhall Cottages.

Church Farm House.

April Cottage

Appendix 1 (ii)

Unlisted Buildings of townscape significance

Church Lane Out buildings to Woodsfield.

Church Hill Farm Barn

The Old Parsonage

The Street School House Cottage.

Winfarthing Primary School.

Outbuilding to Church Farmhouse

The Shingles

Laburham Cottage

Holly farm barn

14 Winfarthing Conservation Area Character Appraisal – July 2021

Policy background

In recent years, the approach to conservation area designation has changed considerably. It is now recognised that development plan policies, development control decisions, and proposals for the preservation or enhancement and the management of conservation areas, can best be achieved when there is a sound understanding of the special interest of the conservation area.

This position is reinforced as follows:

The Planning (Listed Buildings and Conservation Areas) Act 1990 in section 66(1) makes it a duty of local authorities when considering applications to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest.

Under section 72 of the same Act, it is a duty with respect to any buildings or land in a conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

Department for Communities and Local Government. National Planning Policy Framework (NPPF) 2018 Paragraphs 184 to 202 cover "Conserving and enhancing the historic environment".

Joint Core Strategy- Policy 2: Promoting Good design South Norfolk Local Plan

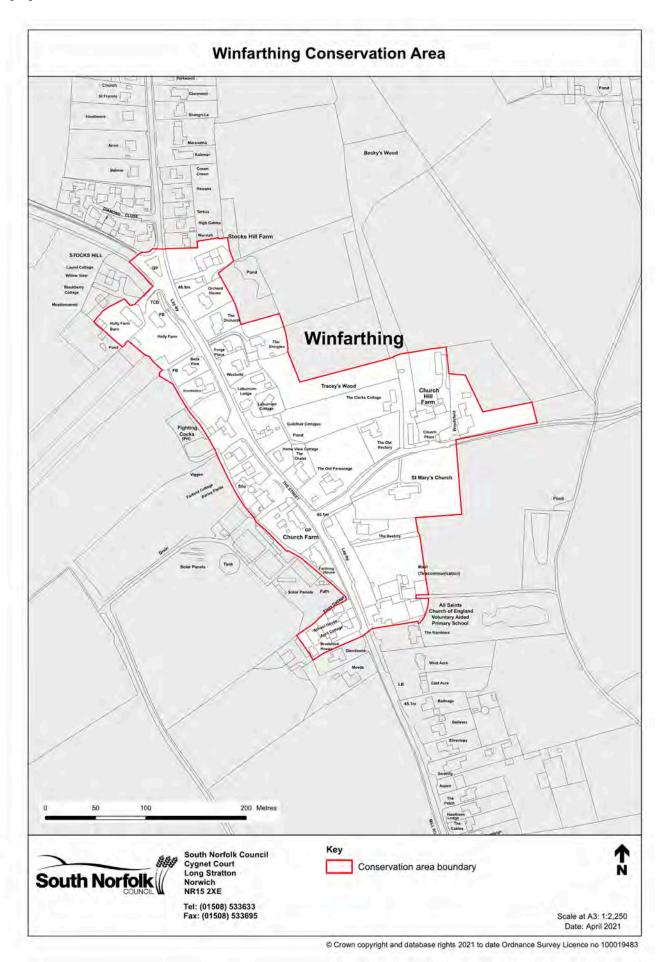
The South Norfolk Local Plan Development Management Policies Document was adopted in 2015 and policy 4.10 covers Heritage Assets.

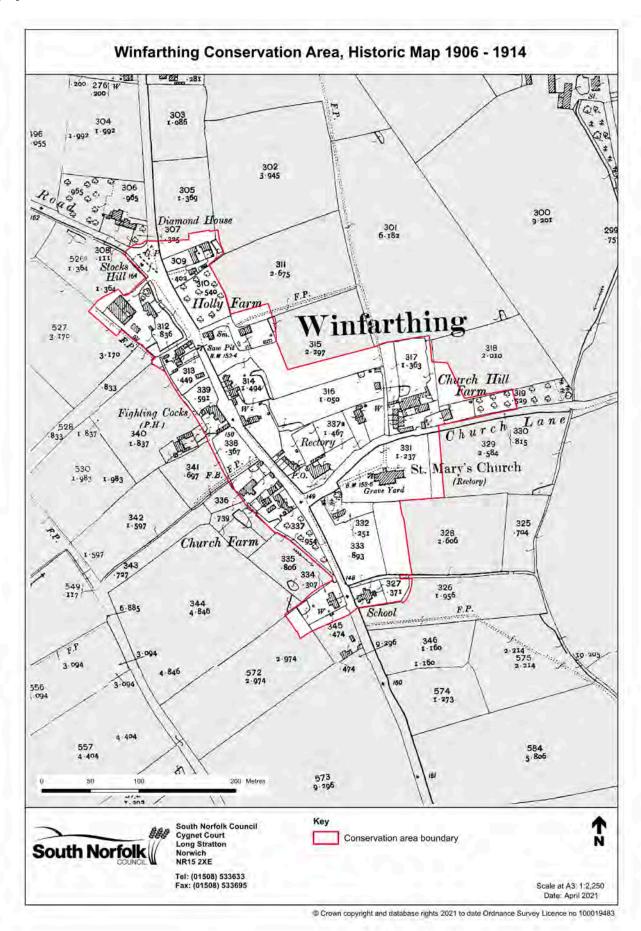
Public Consultation

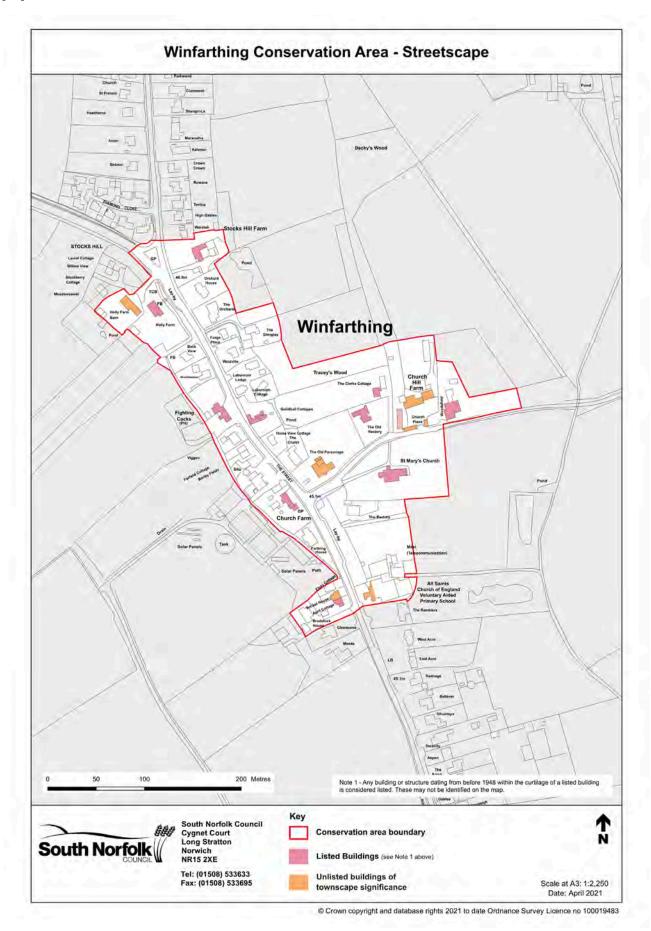
An informal 'walkabout' of the area was organised with the Parish Council on 20th February 2020. This informed the proposed boundary changes and the conservation management guidelines within the draft appraisal. The public consultation on the draft appraisal took place from 15th February to 15th March 2021, with attendance at the parish meeting on 23rd February 2021. Due to the Covid-19 Lockdown regulations the public meeting was carried out through virtual attendance at the parish council meeting online. The consultation and parish council meeting were advertised through:

- An advert in village notice board and local publicity by the parish council
- The draft appraisal being available to view on the council's website.
- Emailing Ward Councillors, County Councillors, the Parish Council and Historic England.
- Contacting residents directly affected by the proposed boundary changes by letter informing them of the consequences of being included in the conservation area.

As a result of the consultation corrections were made to the appraisal, and some of the proposed boundary changes recommended in the draft appraisal were not taken forward.











Wramplingham

Draft Conservation Area Character Appraisal and Management Guidelines

July 2021









Content

Introduction	3
Historical Development	4
Character Assessment	4
Conservation Management Guidelines	10
Appendix 1(i) - Listed Buildings in Burston Conservation Area	12
Appendix 1(ii) - Unlisted Buildings in Burston which are of townscape significance	12
Appendix 2 - Policy & Consultation	13
Appendix 3 - Conservation Area Boundary	14
Appendix 4 - Historic Map	15
Appendix 5 - Streetscape	16
Appendix 6 - Natural Character	17

Introduction



View along The Street looking East

Wramplingham is a small rural settlement on the river Tiffey, 7 miles west of the city of Norwich and about 4 miles north of the market town of Wymondham. Nestling in the lower slopes of the Tiffey Valley, the village enjoys the protection of the rising land to the south from which there are distant views across the village and beyond. Its strong natural character with large numbers of mature trees allows it to blend in to views of the surrounding countryside

Under the terms of Planning (Listed Buildings and Conservation Areas) Act 1990, the Local Planning Authority is required to identify areas of special architectural or historic interest whose character or appearance it is desirable to preserve or enhance, and to designate them as a Conservation Area. The 1990 Act also requires local authorities to prepare management guidance and proposals for Conservation Areas. Wramplingham conservation area was originally designated in 1994. This document should be read in conjunction with the adopted Local Plan, the National Planning Policy Framework and Planning Practice Guidance.

Key Characteristics

- River valley
- Large pond with historic buildings at its centre
- Open front gardens
- Strong natural character
- Church overlooks the village
- Distant views of wider landscape from the south

Historical Development (also see historic map in Appendix 4 p15)

The Parish of Wramplingham was established by the time of the Norman Conquest and is included in the Domesday Book, which details its population, land ownership and productive resources. The derivation of the name appears uncertain, but it may have originated from a nickname formed from the base of such words as "wramp" meaning a "twist" (17th century) and "wrimpled" (wrinckled), c1430.

The most obvious reminder of Wramplingham's medieval heritage is its parish church dedicated to St Peter and St Paul. The building features a 13th century round tower with a tall lancet doorway. The nave dates from the 11th/12th century but the chancel was rebuilt in 1448 and the arcade and north aisle date from 1872. The medieval churchyard was much larger than the existing one. Other than the church there are no other medieval structures that survive in village.

In 1851 the population was 245 which had dropped to 168 by 1911, mostly due to the migration of younger people. By 2011 this had dropped further to 115.

Character Assessment

(Also see Streetscape and Natural Character Maps in Appendices 5 and 6 pages 16 and 17)

Wramplingham and its setting

Wramplingham is surrounded by open countryside which is visible well beyond the conservation area in landscape views from the higher ground of the valley to the south side. At the southern entrance to the conservation area from the church, the road meanders down the valley offering extensive views over the village and beyond. However, due to vegetation and topography, there are few clues as to the character of the conservation area in these longer views.



View looking northeast to conservation area from churchyard



View looking west away from the conservation area

From the extreme east and west sides of the settlement, the view back is dominated by the church which occupies a commanding position near the crest of the hill to the southeast. From the main street through the village, views are more enclosed due to the line of dwellings, an exception being at the centre where the street unexpectedly opens out, from which there are longer views across Glebe Farm to the south opposite Mill Pond. The church, so dominant to the south, is not visible to any significant degree from along The Street. Mature hedgerows and grass verges line the road through most of the conservation area with mature trees dominating many views.

Conservation Area Boundary

The River Tiffey forms the northern boundary of the conservation area extending from Riverside Cottage in the east to Hall Cottages in the west. To the south, the boundary runs along School Lane breaking off to include the Parish Church and The Old Rectory, the latter being an addition to the conservation area as part of this review.

Street Patterns and Historic grain

Historically, moving west to east, Crow Hall Farm, Church Farm, Mill Farm, Glebe Farm and Low Farm have dominated the pattern of the settlement. Along the main street are several buildings of historic importance including Mill Farmhouse. The village here is also a place of contrasts: the open frontages of The Bowers compared to the walled enclosures of Mill Farm and River House; the closing-in of the street by the trees and wall of Mill House and its sudden 'release' by the mill pond and meadows where the road and river come together with more distant views to the top of the valley to the south. Finally, there is the unusual cluster of cottages at the east end compared with the open spacious character to the west.

Another puzzle lies in the unusual "pattern" of the buildings. To the south of The Street, it seems as though they are set in ranks with Mill Farm and Quaker Farmhouse forming the front tier, The Bowers right behind, with Church Farm and Crow Hall to the rear. Since the last appraisal Glebe Farmhouse, largely an 18th century building, has been demolished but would have be ranked alongside The Bowers. The whole arrangement is presided over by the Church of St Peter and St Paul.

Perambulation

The Church is not only the most significant building historically and architecturally, but geographically as well. Its commanding position near the top of the valley allows it to dominate the village below and provides a re-assuring presence in views back from the east and west boundaries. The mature hedge, and large trees at its front boundary do not hide the church, its status being apparent in views from the road.

From the south, the church is shielded by the dense woodland grounds of The Rectory, an impressive mid-19th century house with a large garden, all of which is completely hidden from view on all sides by the surrounding dense woodland. The road continues north from the church with mature hedgerows and narrow grass verges either side, the hedges not being so high as to prevent a glimpse of longer landscape views towards the conservation area to the northwest.



St Peter & St Paul



View from The Street







Replacement farm dwelling

From the church, the first buildings on the left-hand side are Crow Hall and its barn, both separate dwellings set some distance back from the road. Crow Hall is a rendered 17th century timber frame house, which is grade II listed, and is the only thatched building in the conservation area. On the opposite side of the road, since the last review of the conservation area the original clay lump house of Church Farm has been replaced with a new Georgian style red brick house. Although the new dwelling does not reflect the vernacular style of the original house, its scale, modest detailing and well-chosen external materials allow it to sit comfortably in the street scene, providing interest. After Church Farm the road turns sharp right opposite the stone War Memorial into The Street.

The Street

There are only five dwellings at north side of The Street, views being dominated by woodland along the line of the river. The walled edge west of Mill House, together with the profusion of trees and shrubs, contrasts with the open and deep front gardens of the dwellings opposite to the south side at The Bowers. On entering from the west, houses to the south are 20th century in character but their modest scale and locations back from the road behind mature hedgerows and trees, allows the natural character to dominate.



Quaker Farmhouse

The buildings along the main street vary in importance but are mostly quite modest in scale and set back from the road. The only notable exceptions are Quaker Farmhouse, an attractive 17th century house perpendicular to the road which contributes much to the historic character of the street scene, and Wramplingham House at the eastern entrance of the conservation area, which is rather too large so that its more modern less sympathetic character dominates its neighbours and the street scene.

At the centre of the conservation area, The River House, a grade II listed Georgian house, is situated behind the mill pond and is partly hidden by walls and trees, although its formal front elevation and large chimney stacks make it an important focal point. By contrast, two key buildings, Mill Farmhouse and Mill House, are set on the edge of road creating a gateway along the mid-point of The Street, where views open out. Mill Farmhouse has superb crow stepped gables with a similar detail on the crenelated top of its boundary wall. The moulded chimneys to Mill Farmhouse and its rear wing add stature to the building. The view is, however, somewhat spoilt by the telegraph poles and overhead wires. Crow stepped gable ends can also be seen at Quaker House further east.







River Meadows

Mill House and River House are both fine examples of 18th century Georgian Houses albeit of different character. River House is in some way the more impressive building being more formal in appearance with side wings in brick, slate roof and a traditional timber conservatory. The fine Beech tree and the brick terrace add mystery and status to its character. The mill pond is cradled in the middle of these fine buildings with a modern railing and concrete posts marking its boundary with the road. These are somewhat of a disappointment and could be replaced with something more appropriate to enhance the street scene. The position of the sign within the pond with its conical shaped flint base is unusual but appropriate, adding interest and character to views.

Moving further eastward, the space opens out to the river and its meadows on the north side where the road and river come together and meander away to the north. Here, mature hedgerows continue to define front boundaries with the road. Opposite, the eye is drawn to the large open view across the meadow of Glebe Farm, its outbuildings visible and of interest. Next moving eastward is a new two-storey dwelling, which has replaced a modern bungalow. Although clearly a modern addition, the overall design of the new dwelling is plain but generally sympathetic and its position back from the road allows it to sit reasonably comfortably.

Further east is Quaker Farmhouse, which is listed grade II*. This is of exceptional significance and one of the larger dwellings in the conservation area. Its rendered finish with brick gable ends and plain tile roof provide a particularly attractive appearance that stands out and dominates street views here. The tasteful entrance design with iron gates together with the the crow stepped gables, diaper brickwork and steep roof pitch of the house all draw attention. The house has been carefully restored in recent years with a sympathetically designed rear extension. By contrast, its ancillary farm buildings are of much less interest.



Quaker Farmhouse

Moving further eastward from Quaker Farmhouse just before reaching the Old Kings Head, of particular note is the surviving timber churn stand, which is a more unusual feature. This together with the decorative brick of the wall behind adds interest to the street scene.

7 Wramplingham Conservation Area Character Appraisal – July 2021

Next is an unexpected cluster of buildings before the east boundary of the conservation area is reached. They have been altered but are modest in scale and form a tightly knit group without precedent elsewhere in the conservation area. Riverside House survives unaltered while the outbuilding to the rear of Meadow View, and the front wall of Low Farm, both in red brick, deserve special mention. The over dominance of Wramplingham House opposite on the east boundary of the conservation area has already been referred to.

Traditional Materials & Architectural Details

Examples of most of the building materials traditional to South Norfolk can be found within the conservation area.

Roofs: Clay pantiles are the most common, both red and black can be found often on the same building, for example the Mill House. There are two notable plain tiled roofs - one on the nave of the church, and the other on Quaker Farmhouse. Slate survives on River House and has been used on the new dwelling at Church Farm. The only thatched roof survives on Crow Hall.

Walls: The prevailing material is red brick although a significant number of the buildings have exceptionally good brickwork either with a "diaper" pattern or with flint. The quality of brickwork is enhanced by the use of crow steps to the gables, crenelated walls, and in shaped chimney stacks. The Mill House has painted brickwork, while there are a number of rendered houses disguising timber frames, clay lump or brick. Black boarding has been used to good effect on the converted barn at Church Farm.

The church is the most outstanding flint building although the gable walls to Crow Hall are in flint and brick. Of particular note is its round tower with octagonal bell-stage and its 13th century lancet windows either side of the chancel.

Other than the medieval Gothic detailing of the church, crenelated boundary walls and crow stepped gable ends there are few other architectural details of note but worth mentioning are the Classical door surround and large chimneys at The River House and the original Georgian sash windows at Mill House.



Surviving timber churn stand



Crenelated walls at Mill Farmhouse



Crow stepped gables at Mill Farmhouse

Natural Character and open spaces

The trees west of Mill House are the most significant group while in many other places, it is individual trees that are noticeable. Worth noting are the three Oak trees that line the north side of The Street moving east from Quaker House. There are good hedgerows along School Lane and some survive to delineate the field boundaries. Mature hedgerows either side of the road are a key feature throughout much of the conservation area along Wymondham Road and The Street.

Other than the open setting of the churchyard the only other key open spaces are the river meadows east of the mill pond and the large field opposite of Glebe Farm. At the river meadow a large area of the land has been maintained with traditional wooden benches installed.

Surface materials and street furniture

All public roads are tarmacadam with grass verges. There are a variety of surfaces for private drives though most tend to be compacted sand and gravel.

Road signs are not too intrusive. There are a number of overhead cables and poles which interrupt the appearance of the area especially at Mill Farm and in landscape views to the west from the churchyard. The area around the mill pond could be rationalised with the modern railing with concrete posts being replaced with something more sympathetic. The telephone kiosk and traditional post box should be safeguarded. The village sign, on a cobbled base set in the mill pond is unusual and adds much to the character at the village centre.

238

Conservation Management Guidelines

Highways



The speed of vehicles going through the village has previously been a concern. There is little traffic congestion and no great need for significant numbers of cars to park along the main street. The natural grass verges add much to the rural character along the main street through the village.

The use of kerbs along the road should be avoided in order to retain the rural character of the street scene.

Upgrading Windows and Doors



In some cases, windows and doors have been replaced with different materials and/or different styles. If original doors or windows need to be replaced, they should ideally be replaced to match. However, if different materials are chosen then the window style should remain the same (if original).

The opportunity should be taken to reinstate traditional styled windows where they have been unsympathetically replaced in the past.

Painting/colour washing buildings



Some of the buildings are rendered or brick with a light colour pastel finish that sits comfortably with the historic character of the area.

With any redecoration, the colours should be chosen to maintain the existing pattern.

Trees/open spaces



The trees/woodland and open spaces of the meadows are a particularly important part of the character of the conservation area, north along the line of the river and provide an important back drop to the street scene.

It is important that lines of trees and woodland areas along the river meadows together with small groups of mature trees along the street are retained to preserve the strong natural character of the village. The carefully managed section of the river meadow is an attractive part of the conservation area and this should continue to be maintained in this way for both the benefit of the conservation area and local community.

Street Furniture



The railings at the mill pond could be replaced with something more in keeping with the historic character of the street scene

Street furniture should be kept to a minimum and where it is necessary, should be designed to be sympathetic to the rural character of the conservation area.

240

Appendix 1 (i)

Listed Buildings (All Grade II, except as noted)

Wymondham Road Church of St Peter & St Paul (grade I)

Old Rectory Crow Hall

The Street Mill Farmhouse

Boundary walls to Mill Farmhouse

K6 Kiosk Mill House River House

Quaker Farmhouse (grade II*)

Appendix 1 (ii)

Unlisted Buildings of townscape significance

Wymondham Road Swallow Barn

Former Outbuildings at Church Farm

The Street Riverside House

Outbuildings to south east of the former Old Kings Head

Front boundary wall to Low Farm Outbuildings at Glebe Farm

Range of buildings to south of Mill Farm

Boundary wall to The River House

Hall Lane Hall Cottage and wall to east

Hall Cottages Wren Cottage

Policy background

In recent years, the approach to conservation area designation has changed considerably. It is now recognised that development plan policies, development control decisions, and proposals for the preservation or enhancement and the management of conservation areas, can best be achieved when there is a sound understanding of the special interest of the conservation area.

This position is reinforced as follows:

The Planning (Listed Buildings and Conservation Areas) Act 1990 in section 66(1) makes it a duty of local authorities when considering applications to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest.

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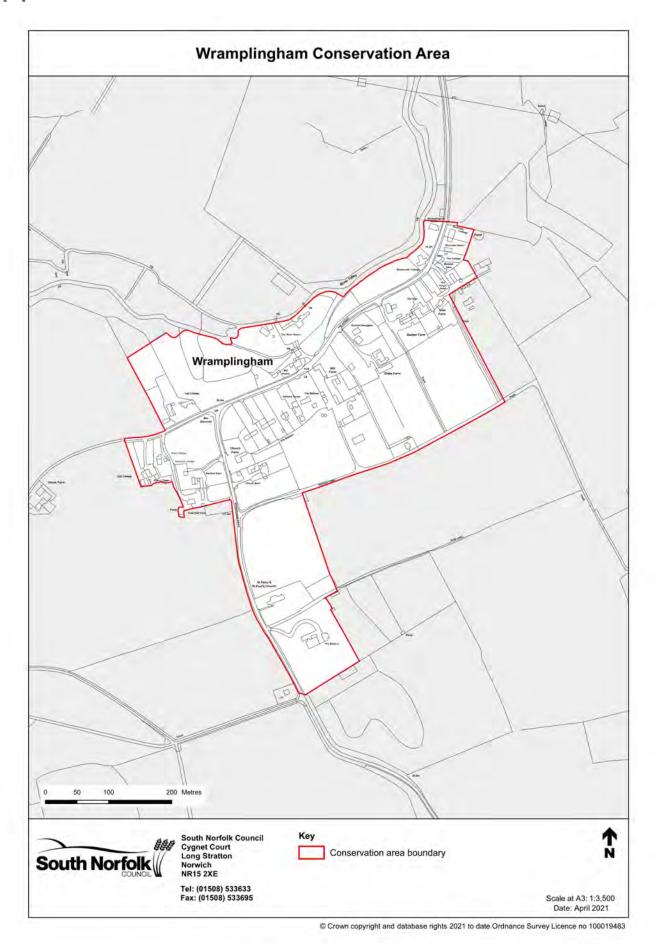
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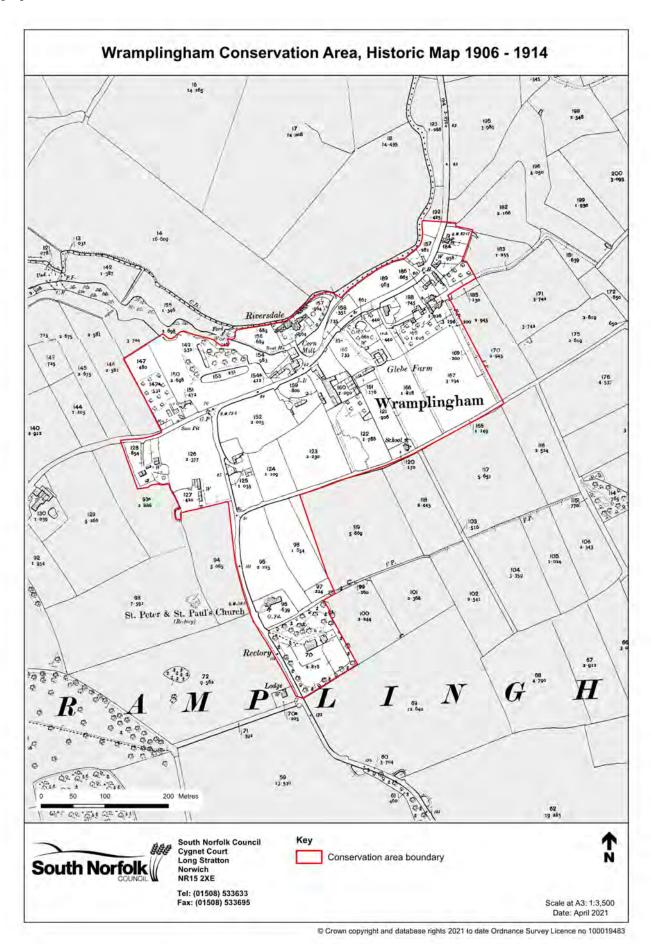
Public Consultation

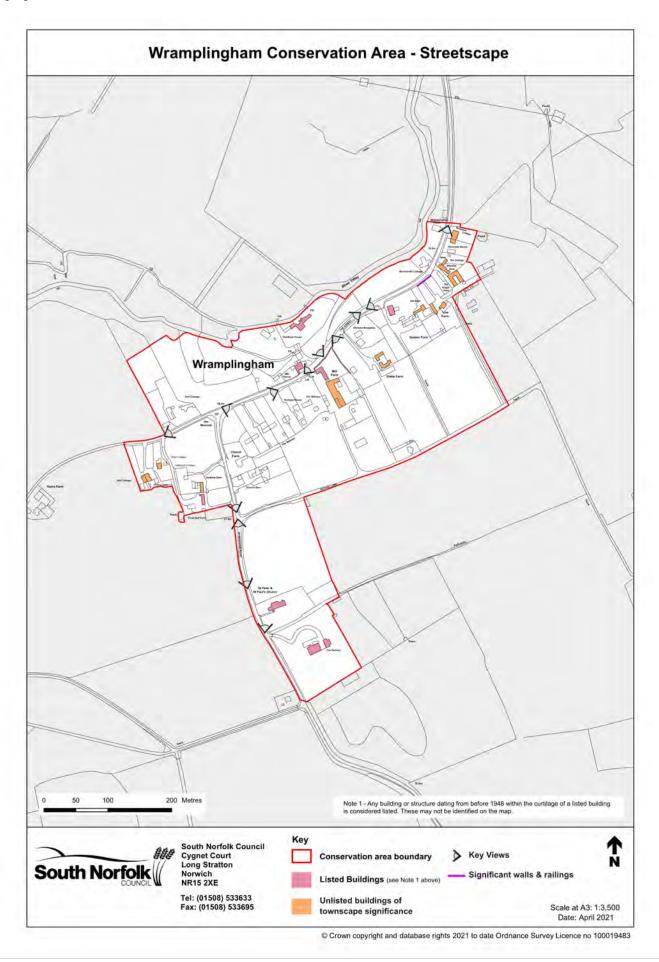
An informal 'walkabout' of the area was organised with the Parish Council on 13th February 2020. This informed the proposed boundary changes and the conservation management guidelines within the draft appraisal. The public consultation on the draft appraisal took place from 15th February to 15th March 2021, with attendance at the parish meeting on 16th. Due to the Covid-19 Lockdown regulations the public meeting was carried out through virtual attendance at the parish council meeting online. The consultation and parish council meeting were advertised through:

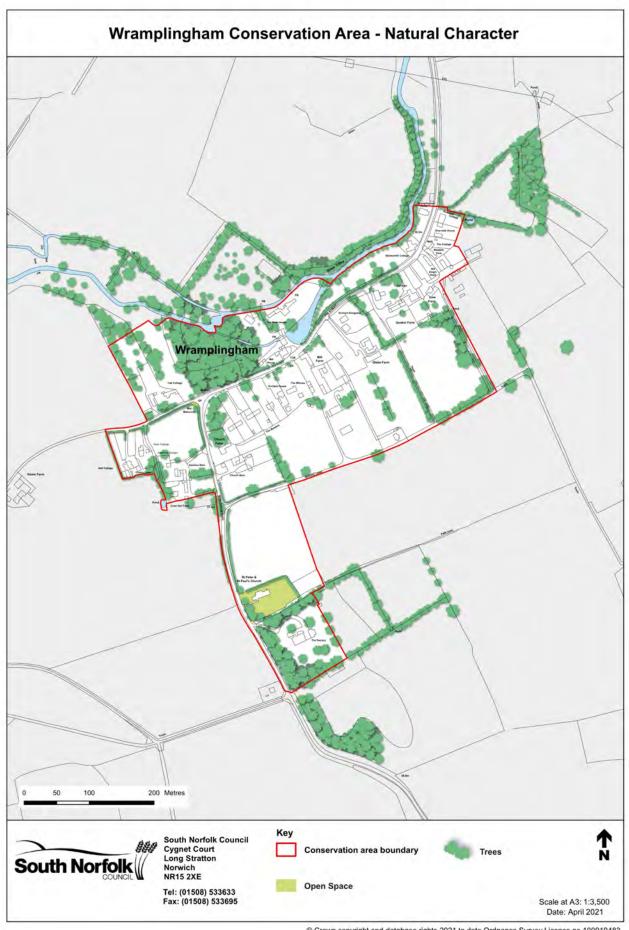
- An advert in village notice board and local publicity by the parish council
- The draft appraisal being available to view on the council's website.
- Emailing Ward Councillors, County Councillors, the Parish Council and Historic England.
- Contacting residents directly affected by the proposed boundary changes by letter informing them of the consequences of being included in the conservation area.

As a result of the consultation corrections were made to the appraisal and some additional information added.











Agenda Item:8 Cabinet

19 July 2021

MOVING TOWARDS A FIRST-CLASS CUSTOMER SERVICE

Report Author(s): Shaun Crook Transformation & Innovation Lead

01508 535307 <u>scrook@s-norfolk.gov.uk</u>

Portfolio: Customer Focus

Ward(s) Affected: All

Purpose of the Report:

This report provides the Committee with an overview of current progress and findings of the Customer Satisfaction and Customer Complaints projects.

The report sets out a proposal for our Customer Strategy and Customer Charter, recommendations in relation to the creation of a Customer Experience & Insight lead role, and a new Complaints Handling Policy incorporating an Unreasonably Persistent Complainants Policy, to allow us to transform our future customer provision.

Recommendations:

We ask that Cabinet consider and approve:

- 1. The adoption of the proposed Customer Strategy;
- 2. The adoption of the proposed Customer Charter; and
- 3. To note the appointment of a new Customer Experience & Insight Lead role.

We ask that Cabinet approve and recommend to Council:

- 1. The adoption of the proposed Complaints Handling Policy
- 2. The adoption of the proposed Unreasonably Persistent Complainants Policy

1. Summary

- 1.1 Customer Satisfaction is a Corporate Project within the SPARK Transformation Programme. Research was conducted late 2020 to document the current approach to customer satisfaction and to investigate the approach of other organisations both in the private and public sectors. Workshops were held with staff across the council to identify areas of strength and areas for improvement in our current customer service provision and to gather their ideas on how we could transform the way we serve our customers in the future. This work resulted in a series of recommendation papers which were discussed and subsequently approved by the Corporate Management Team.
- 1.2 Complaints is a project within the SPARK Transformation New Ways of Working Corporate Programme. Research was undertaken in 2020/21 to understand current complaint handling practices and processes and to research how other organisations manage complaints. This included a series of meetings with staff who regularly deal with complaints and with several Assistant Directors. In addition, we considered guidance published by the Ombudsman. This work resulted in a recommendation paper which proposed a new Complaints Policy and Unreasonable Complainants Policy both of which were considered and subsequently approved by the Corporate Management Team.

2. Background

Customer Satisfaction

- 2.1. Research was conducted late 2020 to document the current approach to customer satisfaction and to consider the approach of other organisations both in the private and public sectors.
- 2.2 Workshops were held with staff from all areas of the organisation to identify areas of strength and weakness in our current customer service provision. We also gathered their ideas about how we could transform the way we serve our customers in the future.
- 2.3 Best practices and agreed ambitions were identified and used to formulate a proposed Customer Strategy, a Customer Charter, and to develop an approach for gathering consistent and measurable customer feedback, initially in the form of a corporate Customer Satisfaction Survey.
- 2.4 The existing Customer Service team provision was reviewed to ensure that it was suitable to deliver the proposed Customer Strategy.

2.5 The Councils 2021/22 Delivery Plan includes a Customer Satisfaction measure for which it has not yet possible to produce any data for. This work helps move us to a position where we can firstly baseline a Customer Satisfaction measure and then start to report our performance against that measure.

Complaints

- 2.6 Investigation was undertaken in 2020/21 to understand current complaint handling practices and processes and to research how other organisations manage complaints including considering published guidance from the Ombudsman.
- 2.7 A series of meetings were held with staff who deal with complaints to identify strengths and areas for improvement with the current approach.
- 2.8 Best practices and future ambitions for handling complaints and dealing with unreasonably persistent complainants were identified and two new policies, with supporting processes and procedures were developed.

3. Current position/findings

Customer Satisfaction - Findings from the review

- 3.1 Across the council there is already lots of really good work to engage with our customers, however this tends to be in at service level or for specific reasons. During the COVID-19 pandemic 'response' and 'recovery' phases through engaging with customers, more often and in different ways we have started to learn how customer behaviour and customer expectations are changing as a result of the new ways of working we adopted during the pandemic.
- 3.2 We deliver some great customer service performance across the council but there are also times when we don't quite meet the levels we would like. When this happens, we don't have an overarching corporate Customer Strategy with an agreed 'Vision' for the type of Customer Service we aspire to deliver.
- 3.3 In most cases we deliver a great service and our customers support us to do our jobs effectively, however on occasion things don't go as well as we would like. When this happens, neither our customers nor our staff have a published Customer Charter to refer to. A Customer Charter sets out what customers should expect from us and what we expect from them. Generally, organisations of this size have this type of document to underpin their customer service standards.
- 3.4 Without a Customer Strategy and Charter officers do not have a clear framework to work to in relation to customer service standards nor a reference point to challenge customers behaviour if inappropriate.
- 3.5 We gather customer feedback and insight in different ways across the organisation, but we don't currently have a consistent way to gather and analyse this data at a corporate level to inform and shape decision making. We regularly engage with our customers but there is no corporate or standard mechanism for

- customers to give us their feedback on a regular and ongoing basis. This means we are unable to measure our performance in this regard or consistently gather customer insight to shape service improvement and transformation.
- 3.6 The councils have Delivery Plan performance measures for Customer Satisfaction, but without a corporate or standard mechanism to measure this it has not been possible to produce any data to date.
- 3.7 During our review we identified a number of customer related tasks which help us to engage with, analyse and understand customer experience and behaviour. When these tasks were gathered at a corporate level, this identified a gap in the current Customer Service structure.
- 3.8 Individually, services work hard to meet customer demand but currently there isn't a dedicated business lead responsible for transforming our customer provision to meet changing customer needs and behaviours and ensure we maximise opportunities afforded by our new flexible, remote working contracts to further enhance our service provision.
- 3.9 There is a real desire and passion across the organisation to really engage with our customers to help shape our service transformation and customer service provision.

Complaints - Findings from the review

- 3.10 The council has an established complaints handling process in place, which ensures that we deal with complaints in line with statutory guidance however the council currently has no published complaints handling policy or unreasonably persistent complainants' policy.
- 3.11 Complaints are currently handled initially at an informal stage and then escalated to a formal stage if requested by the customer.
- 3.12 Complaints at the informal stage are not recorded and therefore can remain at that stage for some time without being effectively managed to ensure they are dealt with in a timely manner. This can mean that complaints that may be ongoing for a long time at the informal stage are not visible to senior leaders.
- 3.13 Because complaints at the informal stage are not recorded they cannot be collated, analysed or used to help shape service improvement for our customers. This can lead to the causes of dissatisfaction remaining unresolved and potentially to repeat complaints.
- 3.14 Whilst many complaints are handled effectively, without a clear policy and supporting processes and procedures they are handled differently across directorates which means that the standard of responses can vary delivering inconsistent outcomes for customers.
- 3.15 There is currently no organisational oversight for complaints and analysis and reporting of formal complaints is limited. Around 40% of the Councils we case

- studied have an independent officer that gives an impartial overview of complaints at formal Review Stage (Stage 2).
- 3.16 Currently it is possible for the staff member who dealt with a complaint at the informal stage to deal with the complaint at the formal stage. It is considered good practice to have the complaint reviewed by a different member of staff to provide an independent assessment.
- 3.17 Around 90% of the Councils we case studied have a two-stage formal process with an Investigation Stage and a Review Stage. This is also identified as good practice by the Ombudsman.
- 3.18 Although individual services implement changes following an upheld complaint there is no structured 'lessons learned' approach across the organisation to ensure that we change processes to reduce errors and avoid repeating the cause for complaints.

4. Proposed action

- 4.1. By putting our customers at the heart of what we do, across the organisation, we can reap the benefits of improved customer satisfaction, delivering efficiencies through service improvements and reducing waste by identifying and resolving causes of dissatisfaction and complaint. We believe that the best way to embed this way of working across the organisation is by clearly setting out our ambitions through a Customer Strategy and supporting Vision and by being open with our customers about what they can expect from us and what we expect from them through a Customer Charter.
- 4.2. As we emerge from the pandemic it is vital that we understand and react to changing customer behaviours and expectations as we shape and transform our services as we continue to develop our One Team, Two Councils model. To do this effectively we need to have the right resources and mechanisms in place to gather, collate and analyse Customer feedback and insight and ensure that our decisions are informed by data.
- 4.3. We are therefore proposing the following recommendations;

Customer Satisfaction

- 4.4. Implement a new Customer Satisfaction Strategy and Customer Charter (as set out in Appendix 1)
- 4.5. A new Customer Satisfaction Strategy and Customer Charter brings a range of benefits that we have set out below;
 - 4.5.1. Customer satisfaction is not only about measurables such as how long something takes or how many times something happens. It is also about an emotional reaction. Really engaging with our customers on a personal level

- will allow us to know how our customers feel about our services.
- 4.5.2. By engaging with our customers more widely it means that customers can help shape our services and we deliver outcomes that are to their benefit and we can make our processes more efficient and cost effective.
- 4.5.3. Understanding more about our customer demographics will enable us to target our communications more proactively to inform and reduce unnecessary contact.
- 4.5.4. The Customer Charter provides a key point of reference, a reason to challenge what we do, and a performance standard to aspire to. It should be used and embraced alongside our current organisational values. It will underpin customer-focused activities and support actions to deliver culture change across the organisation.
- 4.5.5. It helps us move to a position where we can establish a baseline measure for Customer Satisfaction and then start to report our performance against that measure.
- 4.6. Introduce a dedicated Customer Engagement & Insight Lead role on a 2-year Fixed Term Appointment (with the option to extend to a permanent role by agreement) (as set out in Appendix 2, part A)
- 4.7. The funding for the new role is contained within the Covid Funding Paper which will be going to Cabinets in June.
- 4.8. Appointing a dedicated Customer Engagement & Insight Lead will bring a range of benefits that are set out below;
 - 4.8.1. Currently there is a range of customer engagement related work which is either done on an ad-hoc basis and therefore incurs a hidden cost to the organisation or not currently resourced. By moving responsibility for this work into a single role, it will release capacity elsewhere and reduce duplication of effort.
 - 4.8.2. The new lead will have overall responsibility for analytical and research work of customer data to provide holistic oversight and help deliver the strategic ambitions of our councils and to support our transformation agenda.
 - 4.8.3. Funding this role from the Covid budget recognises that role will be crucial to understanding changes in customer behaviours and expectations post the COVID-19 pandemic. This role will also be key to ensuring that we then use this to transform our customer service provision by maximising opportunities presented by flexible and remote working from any location.
- 4.9. **To move line management for the core Customer Service Team** (as set out in Appendix 2, part B)

- 4.10. We propose to move line management from Place directorate to the new Customer Engagement & Insight Lead under the AD Transformation, IT and Digital within the Resources directorate. There are a number of benefits that we have identified, and these are set out below.
 - 4.10.1. It recognises the corporate nature of the team and provides an improved escalation route for feedback and ideas to improve the customer service provision.
 - 4.10.2. It places the team within the structure of the AD for Transformation, IT & Digital alongside key enabling teams.
 - 4.10.3. It will enable the team to support how we embed the Customer Service Strategy across the organisation and enriches job satisfaction.

Complaints

- 4.11. **Implement the proposed complaints handling policy** (as set out in Appendix 3).
- 4.12. There are a range of benefits that we have identified which will be realised by implementing the new Complaints policy which we have set out below;
 - 4.12.1. The proposed complaints handling policy offers a two-stage formal process, an Investigation Stage and a Review Stage which still provides a clear focus on resolving the complaint at the earliest opportunity but also ensures we capture learning points at both stages to improve services and reduce causes of dissatisfaction and complaint.
 - 4.12.2. It ensures that complaints and expressions of dissatisfaction are progressed without unnecessary delay, that early contact is made with the customer to discuss their issue and that the complainant then receives updates and a timely response at each stage.
 - 4.12.3. It ensures that a complaint is reviewed by a different person at the Review Stage from the person who carried out the Investigation Stage to ensure the complainant receives an objective review.
 - 4.12.4. Ensures that ownership for handling and managing complaints will remain within the appropriate service area but with an independent review of our Stage 1 responses to ensure that our responses are reviewed from a customer perspective in line with our customer charter and provides objectivity.

- 4.12.5. It introduces a quality assurance review across all complaints at the Review Stage to ensure that we have done everything we should to resolve the complaint before it escalates to the Ombudsman.
- 4.12.6. It will reduce the number of cases that need to be dealt with directly by the Managing Director but leaves a path for this to happen in the more contentious cases.
- 4.12.7. Aligns the complaints processes for both Councils which enables officers to work in the most efficient way.
- 4.13. **Implement a new Unreasonably Persistent Complainants' policy** (as set out in Appendix 4).
- 4.14. There are benefits that we have identified which will be realised by implementing the new Unreasonably Persistent Complainants' policy which we have set out below.
 - 4.14.1. The unreasonably persistent complainant's policy provides staff with a framework on how to deal with complainants that may be behaving in what the Council deem as an unreasonable manner.
 - 4.14.2. It provides a clear process for decision making in these cases.
 - 4.14.3. Aligns the unreasonably persistent complainant's processes for both Councils which enables officers to work in the most efficient way.

5. Other options

5.1. The Council could decide to maintain the current/existing arrangements and ways of working with regards to customer experience and complaints, however, this would mean that the benefits set out above would not be achieved

6. Issues and risks

- 6.1. **Resource Implications** If the decision to extend the new Customer Engagement & Insight Lead beyond the initial 2-year contract is made then ongoing funding for this role would need to be identified.
- 6.2. **Legal Implications** None identified
- 6.3. **Equality Implications** None identified
- 6.4. **Environmental Impact** No impact identified
- 6.5. Crime and Disorder No impact identified
- 6.6. Risks None identified

7. Conclusion

7.1. This report sets out proposals that will form key steps to moving towards delivering a first-class customer service and enabling us to shape and transform our customer service provision to enable customers to receive the right outcome, at the right time and in the right way

8. Recommendations

We ask that Cabinet consider and approve:

- 1. The adoption of the proposed Customer Strategy;
- 2. The adoption of the proposed Customer Charter; and
- 3. To note the appointment of a new Customer Experience & Insight Lead role.

We ask that Cabinet approve and recommend to Council:

- 1. The adoption of the proposed Complaints Handling Policy
- 2. The adoption of the proposed Unreasonably Persistent Complainants Policy

9. Background papers

9.1. There are no background papers

Moving towards a First Class Customer Service

Appendix 1 - Customer Strategy including Customer Charter

2021

Version 1.0





Our Customer Strategy

By putting our customers at the heart of what we do, across the organisation, we can reap the benefits. As One Team supporting Two Councils, now is the perfect time to renew our focus on this.

Customer satisfaction is not only about measurables – how long something takes or how many times something happens - it is an emotional reaction. Really *engaging* with our customers on a personal level will allow us to:



257

Background

We are here to serve our customers and to enable them to be able to access services in the right way and at the right time. We want to ensure that we involve and support them as effectively as possible.

We have some good examples of great customer experience but we always strive to do better.

We will be improving our service by;

Introducing a customer charter which sets out what customers can expect from us and what we need from them

Introducing a consistent mechanism for our customers to engage with us and provide feedback and help shape our services Introducing and publishing customer service performance data to show how we are doing.

This document sets out our approach in more detail.

Our vision

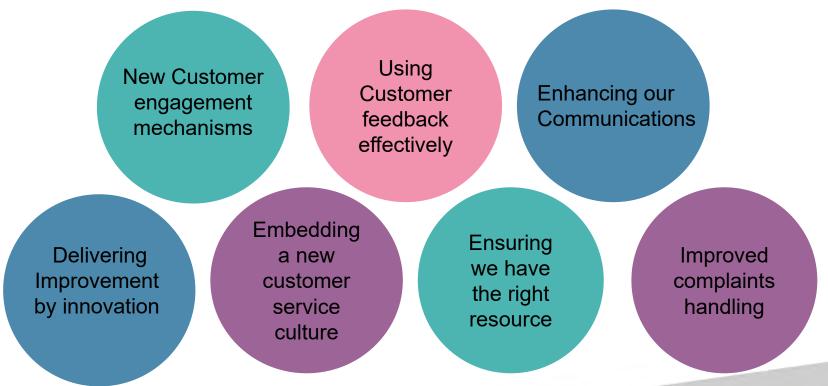
To have a Customer Service culture that builds a strong relationship between us and our residents, businesses and partners across Broadland and South Norfolk.

To allow open and free flowing feedback, in a way that is appropriate to the customer, giving us the ability to recognise areas of success and use feedback to continuously improve our services.

To ensure that services are designed around our customer needs and that they can access services through multiple channels and at times that they need us.

How will we deliver it?

By introducing a new approach across the organisation and delivering it through the following key areas:

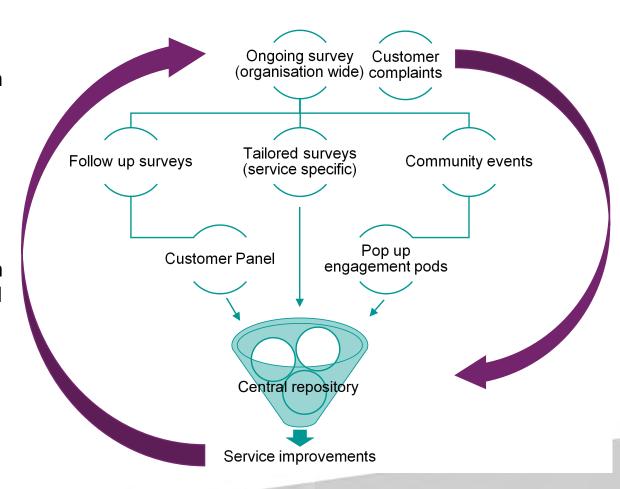


Customer Feedback mechanisms

All feedback should be seen as good feedback, and should be used to inspire service improvements that will benefit our customers.

We will look to expand our opportunities to engage with our customers, as displayed by the graphic, right.

Service specific, tailored and transactional surveys will also be used to improve customer experience.



Our new Customer Charter

We will make it clear how you can contact us and access our services

- Explain what services we provide and what to expect from them
- Offer different contact options to suit your needs and preferences
- Empower you to tell us how we are doing and help us to improve our organisation
- Make sure you can contact us in the way and at a time that works for you

We will treat you with respect, courtesy and understanding

- Communicate with you in plain English with no jargon
- Identify ourselves and give you our names
- Respect your right to privacy and confidentiality
- Make sure our team have the skills, behaviours and tools they require to deliver services to you

We will listen, understand, and get things done

- Keep you informed with up to date information about the services you use
- Do our best to put things right that have gone wrong
- Try and resolve your query the first time you contact us If we can't, we will let you know the next steps.

You can help us achieve this by

- Always treating our staff and contractors with respect and courtesy
- Giving us all the information we require to help us meet your needs
- · Giving us feedback on our service so we can learn and improve
- · Telling us when something changes
- · Asking us to explain anything you are not sure about



Who is our customer?

Any individual, group,
organisation or
business that resides
in, does business in
or with, or visits, the
Norfolk distant

- Continue to improve the services available online
- Ensure our website and online processes are clear, quick and easy to use

Telephone

- Keep waiting times to a minimum. In times of high demand, we will keep you informed.
- Update automated messages regularly with up to date information
- •When returning your calls, staff will clearly state their first name, their department and their reason for calling

Face to face

- Make sure our buildings are welcoming, safe and fully accessible
- Where possible provide you with bookable appointments
- •If there is a delay or change to your appointment we will explain why and keep you informed.

Social media

"

•Share relevant and timely information

- •Be clear and concise
- •Respond to questions as quickly as possible

Written communication

•Ensure all service email addresses have an 'automatic reply' which clearly explains what will happen next

- Make sure all emails contain our contact details
- Make sure any letters we send contain a reference so they are easy to trace if necessary

Innovation

- · Use new technology, as it becomes available, to create more ways for you to get in touch with us
- Make more of our services available online and look for ways to increase our flexibility so you can contact us at a time that suits you
- Keep up to date with emerging technology that we could use to help you to get the right outcome, at the right time and in the right way

Moving towards a First Class Customer Service

Appendix 2

- A) Customer Experience & Insight Lead Role
- B) Customer Service Structure

2021

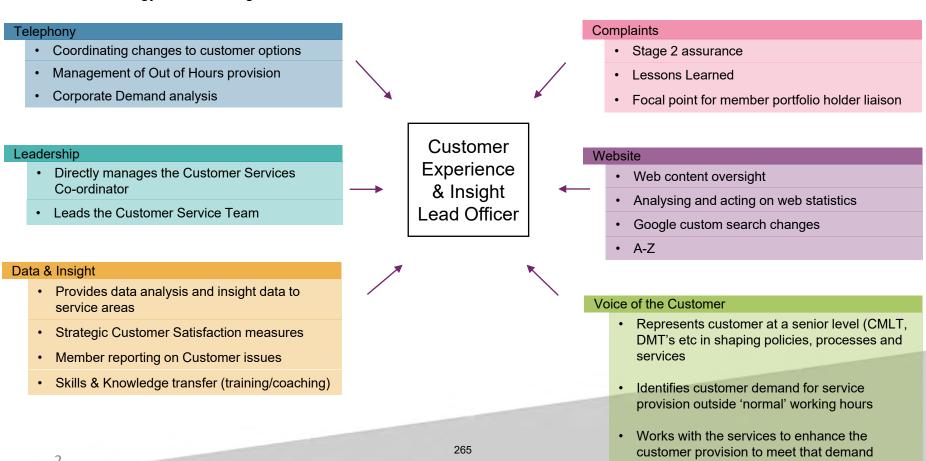
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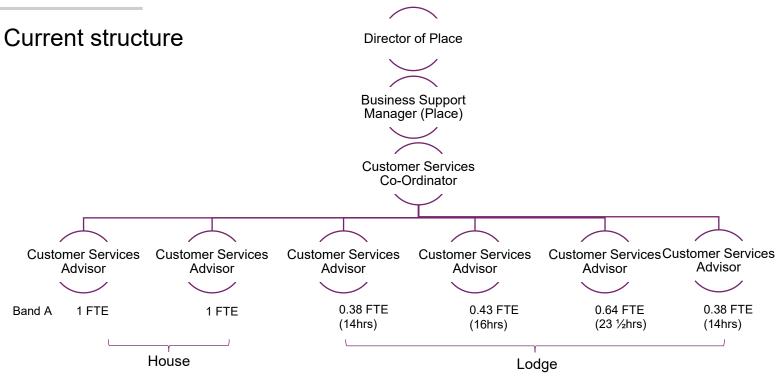


A) The Customer Experience & Insight Lead Role

We are recommending a new role which would effectively fill a gap in our existing structure and bring together all on the customer related responsibilities into a single, central point to ensure a cohesive and strategic approach to delivering the Customer Strategy and ensuring that we embed the behaviours set out in the Customer Charter.

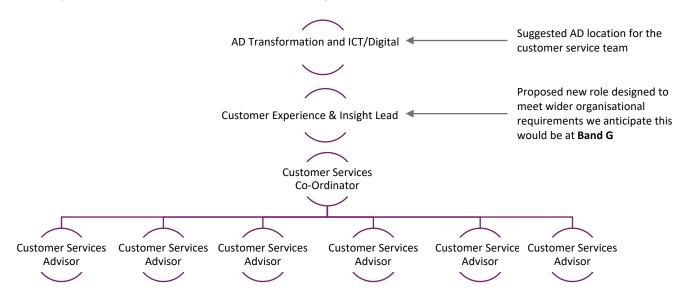


B) The Customer Service Structure



Proposed structure

In order to deliver against our Customer Satisfaction Strategy, our Customer Service provision needs be appropriately placed and suitably resourced within the structure of the organisation.



We propose the current provision is moved from Place directorate into the Resources directorate, under the new AD for Transformation and ICT/Digital for the following reasons:

- It moves responsibility for the team to a new Customer Experience & Insight Lead role which has overall responsibility for overall customer experience.
- It brings the Customer Service provision in the same directorate as Comms, Transformation and Innovation, ICT/Digital and
 Facilities. This places them in the best place to help shape our new Customer Strategy approach and influence how we engage
 with our customers including social media and digital services as well as our face-to-face offering.

South Norfolk Council Complaints Policy

Introduction

This complaint policy sits alongside our overall customer satisfaction strategy and should be considered alongside our customer charter.

At South Norfolk Council we are committed to continually improving our services and ensure that we put our communities and residents at the heart of everything we do.

In order to do this, we encourage, our residents, businesses, visitors, community groups and any other group or individual that uses or are affected by our services (referred in this policy as complainants) to tell us when things go wrong. This is important because then we can put things right and learn from our mistakes.

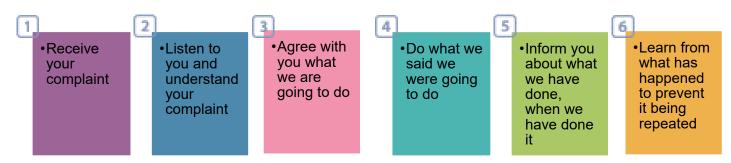
This policy sets out how we handle complaints from our complainants in a simple and timely way that is open and transparent.

Our definition of a complaint is:

66

An expression of dissatisfaction about a council service (whether that service is provided directly by the council or by a contractor or partner) that requires a response.

The following steps are applied to all complaints received and we will:







Good complaint handling means:

Being customer focussed

We will ensure our complaints process is easy to find and use and keep our complainants informed.

Being open and accountable

We will have a process that is transparent and admit when things have gone wrong.

Acting fairly and proportionately

We will base our decisions on sound evidence and explain clearly why they were made

Putting things right

When we have done something wrong we will apologise and take steps to put it right

Seeking continuous improvement

We will learn from complaints received and use this to improve our services

Getting it right

We will comply with the law and follow our own policies.

Stages of Complaint

Our aim is to resolve complaints for our complainants as quickly and simply as possible. Our principle is to provide a high-quality response which resolves the issues raised by the complainant and finds a suitable outcome.

Stage 1

- This is the investigation stage.
- Responsibility sits with the manager responsible for the service.
- The purpose is to fully investigate the complaint and the emphasis is on trying to reach a resolution. If a resolution cannot be reached, the complainant has the right to escalate their complaint to Stage 2.

Stage 2

- This is the review stage.
- Responsibility sits with the Director of the relevant service area
- To carry out a review of the response we provided to the complaint at Stage 1 to and to review any new relevant information provided by the complainant.

When we receive a Stage 1 and 2 complaint, we will:

- Acknowledge the complaint.
- Contact the complainant to discuss the complaint and agree what we are going to do.
- Investigate the complaint and do what we say we will do to resolve the complaint.





- Keep the complainant informed and notify them if there is a delay and commit to a new timescale in which they will receive a response.
- Contact the complainant to tell them what we have done and why we have done it (the outcome and reasons for the decision).

For Stage 2 complaints we will also:

- Establish why the complainant is dissatisfied with the response at Stage 1.
- Try to deal with the cause of the dissatisfaction before it escalates to Stage 2.
- If there are no grounds to investigate at Stage 2, contact the complainant to explain our decision.
- If there are grounds for a review at Stage 2 then follow the above procedures for all complaints

In our responses where applicable:

We will:

- Acknowledge when things go wrong
- Apologise when appropriate
- Improve procedures so similar problems do not happen again

Response Times

We aim to resolve all complaints within 15 working days. However, if a complaint can be resolved sooner, then we will make every effort to do so. Some more complex cases may take longer but we will ensure you are kept informed.

Next Steps

If you have been through all stages of our complaints procedure and are still dissatisfied, you can ask the Local Government Ombudsman to review your complaint.

The Ombudsman investigates complaints in a fair and independent way - it does not take sides. It is a free service.

The Ombudsman expects you to have given us chance to deal with your complaint, before you contact them. If you have not heard from us within a reasonable time, it may decide to look into your complaint anyway, this is usually up to 12 weeks.

The Local Government Ombudsman looks at individual complaints about councils and some other organisations providing local public services.





Contact

Website: www.lgo.org.uk Telephone: 0300 061 0614

Opening hours

Monday to Friday: 10am to 4pm (except public holidays)

Continuous Improvement

We are committed to learning from the complaints we receive and promoting a culture of continuous improvement. To do this we will:

- Regularly report the complaints received to senior leaders along with lessons learned.
- Review and make changes to policies and procedures where necessary.
- Provide relevant training to staff.

Other types of feedback or enquiries

The following will not be dealt with under this policy but will be dealt with under their own policy/procedure:

- Complaints of fraud or corruption
- Whistleblowing
- Hate incidents
- Information requests
- Member misconduct

Retention Guidelines

The following sets out our retention guidelines for all complaints received:

Stage 1 & Stage 2 Complaints

- Destroy 2 years after the closure of the complaint. Unless the complaint has been escalated to the Ombudsmen (see Ombudsmen retention guidance).
- Files will be reviewed and destroyed on a monthly basis.

Ombudsmen Complaints

- Destroy 6 years after the closure of the complaint.
- Files will be reviewed and destroyed on a quarterly basis.





Appendix 4 Policy: Unreasonably persistent contact or complaints/complainants

Introduction

- 1. The majority of complaints will be resolved through our complaints handling process and policy and all efforts should be made to do so. However, in a small number of cases people pursue complaints in a way that can impede the investigation of their complaint, or can have significant resource implications for the council. This policy has been formulated alongside our customer charter to deal with the small number of complaints which make it necessary for special arrangements to be taken.
- 2. Before implementing the provisions in this policy, officers must consider whether the council's procedures have been followed correctly, make sure full and reasonable responses have already been given and decide if the complainant is now unreasonable.
- 3. The council has a duty to provide a safe working environment and system of work for its officers. Regardless of this policy, abusive, offensive or threatening conduct may be referred to the police to take action as appropriate in addition to any action the council may decide to take.

Unreasonable complaints

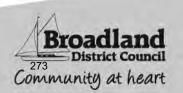
- 4. We have formulated this policy in accordance with guidance form the Local Government Ombudsman (LGO) in relation to the definition of unreasonable complaint behaviour and unreasonable persistent complaints.
- 5. We define unreasonable complaints as contact for persons who, because of the frequency or nature of their contacts with the council, hinder our consideration of their or other people's complaints.
- 6. Examples include the way, or frequency, in which complainants raise their complaint with staff or how complainants respond to officers dealing with the complaint.
- 7. Features of an unreasonable complaint include the following examples (the list is not exhaustive, nor does one single feature on its own imply that the complaint will be considered as being unreasonable).





The following are non-exhaustive descriptions of the behaviour of an unreasonable complainant who may:

- Have insufficient grounds for their complaint and be making the complaint only to inconvenience the council, or for reasons that he or she does not admit or make obvious
- Refuse to specify the grounds of a complaint despite offers of assistance from council staff
- Refuse to co-operate with the complaints investigation process while still wishing their complaint to be resolved
- Refuse to accept that issues are not within the remit of the complaints policy, despite having been provided with information to this effect.
- Refuse to accept that issues are not within the power of the council to investigate, change or influence (e.g. insisting that there must not be any written record of the complaint or that a certain officer shall or shall not deal with the matter).
- Make groundless complaints about staff dealing with complaints and seek to have them dismissed or displaced.
- Make an unreasonable number of contacts with the council in relation to a specific complaint or complaints
- Make persistent and unreasonable demands of staff and/or the complaints process after the unreasonableness has been explained (e.g. a complainant who insists on immediate responses to numerous, frequent and/or complex letters, telephone calls or emails or demands to be seen immediately when coming to the council offices)
- Raise new or secondary issues whilst a complaint is being addressed that were not part of the complaint at the start of the complaint process
- Change the substance or basis of the complaint without reasonable justification whilst the complaint is being addressed





- Adopt an excessively scattergun approach, by pursuing a complaint with the council and at the same time with a member of parliament, other councils, members of the council, the council's independent auditor, the police, solicitors and the Local Government Ombudsman
- Refuse to accept the outcome of the complaint process after its conclusion; repeatedly arguing the point, complaining about the outcome and/or denying that an adequate response has been given
- Make the same complaint repeatedly, perhaps with minor differences, after the complaints procedure has concluded, and insist that the minor differences make it a new complaint to be dealt with.
- Combine some or all of these features

Classification

- 8. The proposal to classify a complainant as unreasonably persistent or as behaving unreasonably should be made by the Director of the service area to which the complaint is being made and this should then be ratified and decided by the Corporate Management Leadership Team (CMLT) see points 11 and 15 below.
- 9. A written record shall be kept of why the complainant is believed to be unreasonable, what information has been considered and the decision made by (CMLT). The council shall act in a proportionate, fair and objective way.
- 10. If more than one service area is being contacted by the complainant, or both councils (South Norfolk and Broadland) are also being contacted, perhaps with different complaints, a nominated officer will co-ordinate the response and may consider setting up a joint meeting to agree a cross service / cross councils approach.

Initial notification

11. When an unreasonable persistent complaint / complainant has been identified, a final offer to meet face to face should be made by the service lead (Senior Manager or above) to explain to the complainant that the council may consider applying this policy due to the unacceptable behaviours. These should be explained along with the content of this policy. After the meeting or if the meeting is declined a letter or email will be sent to the complainant - see point 15 and the template letter for persistent





complainants 'Important information regarding future correspondence', which will explain the action the council is taking.

Options for dealing with an unreasonable complainant

- 12. The options which the council may consider include:
 - Refusing to accept a complaint or to amend the terms of the complaint
 - Requesting contact to be in a particular format (e.g. letters only)
 - Requiring contact to take place with one named member of staff only
 - Restricting telephone calls to specified times/ days / duration
 - Requiring any personal contact to take place in the presence of an appropriate witness
 - Letting the complainant know that the council will not reply or acknowledge any further contact with them on the specific topic of that complaint or at all

In deciding on an appropriate option, care will be taken:

- Not to interfere with a complainant's statutory rights e.g. to attend council meetings or view papers, when making such restrictions
- To make sure that the council takes appropriate action in response to a matter included in a complaint where necessary
- If we have a duty of care as we are their current landlord e.g. temporary accommodation
- 13. These options are not exhaustive and other factors individual to the case or service may be relevant in deciding an appropriate course of action. For example any arrangements for restricting a complainants contacts must take into account the complainants circumstances such as age, disability, literacy levels, race, vulnerability and additional needs.
- 14. If none of the options listed above offer the protection that staff are entitled to, other options may be available, such as taking out an injunction against a complainant or involving the police. These will be considered on a case by case basis, in consultation with legal services as necessary.
- 15. When a decision has been made as to the appropriate restrictions to be used, the MD (after it has been ratified at CMLT) will write (email) the complainant explaining the council's decision and the nature of restrictions being made. (Refer the template letter as mentioned in point 11).





- 16. If a complainant considers that the council is acting improperly or unfairly when making restrictions, they have the option of complaining to the Local Government Ombudsman which will have been explained in response to stage two complaints.
- 17. Appropriate managers, Executive Assistants and staff e.g. those likely to be involved in implementing the restrictions should be notified of the decision.

Reviewing decisions

18. All restrictions will be subject to review, at least once every six months. Service areas may wish to review within a shorter time period to take account of changes of circumstances and/or behaviour.







Agenda Item:9
Cabinet
19 July 2021

Skills and Training Project

Report Author(s): Lucy Kirkum

Economic Growth Administrator

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Portfolio: Economic Development

Ward(s) Affected: All

Purpose of the Report:

This paper is intended to achieve the following:

- Outline the background and context of the local economic situation specifically policy changes and changes in the economic environment that impact upon skills and training
- Define the target cohorts for our skills and training offer
- Provide a summary of the Councils' current skills and training provision
- Taking the previous sections into account, outline a project plan that will enable us to have a positive impact for the identified cohorts

Recommendations:

- 1. To note the impacts on skills, training and the wider economy in South Norfolk and Broadland and to note the intended approach to tailor our support to specific cohorts of residents and start-up businesses.
- 2. To agree to the establishment of a centralised apprenticeship budget comprised of existing apprenticeship posts across all directorates, topped up through increasing the vacancy factor from 2% to 3.5% to generate an additional £245,000 from recurring underspend across both councils.

1. Summary

- 1.1. This paper is intended to achieve the following:
 - Outline the background and context of the local economic situation specifically policy changes and changes in the economic environment that impact upon skills and training
 - Define the target cohorts for our skills and training offer
 - Provide a summary of the Councils' current skills and training provision
 - Taking the previous sections into account, outline a project plan that will enable us to have a positive impact for the identified cohorts

2. Background

2.1 National Economic Position

- 2.1.1 The Covid-19 pandemic has had a significant impact on the UK economy. Despite the economy adapting well to the lockdowns, there was still a decline in economic activity in early 2021 where GDP fell by 2.5% in January. In March 2021, GDP remained 6% lower than before the pandemic.¹
- 2.1.2 A number of predictive recovery models with slightly differing estimations are available. These broadly project GDP to recover to late 2019 levels between 2022-2025². The following quote from the Organisation for Economic Cooperation and Development (OECD) outlines the current situation:

'In both scenarios, the recovery, after an initial, rapid resumption of activity, will take a long time to bring output back to pre-pandemic levels, and the crisis will leave long-lasting scars - a fall in living standards, high unemployment and weak investment. Job losses in the most affected sectors, such as tourism, hospitality and entertainment, will particularly hit low-skilled, young, and informal workers'³

2.1.3 The scenario described by the OECD is borne out in the following data:

¹ House of Commons- Coronavirus: Economic impact briefing paper June 2021

² FT - Bank of England Tempers Forecasts for UK Economic Rebound

³ OECD - Economic Outlook June 2020

- According to data from the Office of National Statistics (ONS), redundancies reached a record high of 370,000 in the three months to October 2020⁴.
- Data from Adzuna on UK job adverts shows that graduate jobs have decreased at a time of year when they would usually increase significantly. In Autumn 2019, the average number of graduate job adverts on Adzuna each week was 113. Across the same period a year later, the average amount of graduate vacancies on the site each week was around 595.
- As of 28th Jan 2021, there were only a quarter of jobs advertised in catering and hospitality compared to the same time the previous year. Vacancies in education have reduced by a third year-on-year⁶.
- According to HMRC, the overall workforce has shrunk slightly, although early retirement due to COVID-19 accounts for some of this reduction. The vast majority of this change can be attributed to job losses⁷.
- Polling by the Resolution Foundation suggests that 13% of renters have fallen behind on their rent during the COVID-19 pandemic⁸.

2.2 South Norfolk and Broadland's Economic Position

- 2.2.1 Data from NOMIS shows that there was roughly a doubling in the out-of-work benefit claimant rate between March and May 2020 in South Norfolk and Broadland. The rate has now stabilised at around 4% in both districts. However, the end of furlough on September 30th 2021 may cause this figure to increase as businesses have less capacity to retain workers.
- 2.2.2 The rate is similar for men and women. However, the claimant rate for under 25's is around twice that of the general population in both Broadland (7.9%) and South Norfolk (6.6%). The impact on young people reflects a national trend.
- 2.2.3 Figure 1 (overleaf) displays the claimant rate for over 16s (as a proportion of the economically active population) in Broadland and South Norfolk.

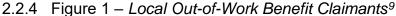
⁴ ONS - March 2020 Coronavirus Round Up

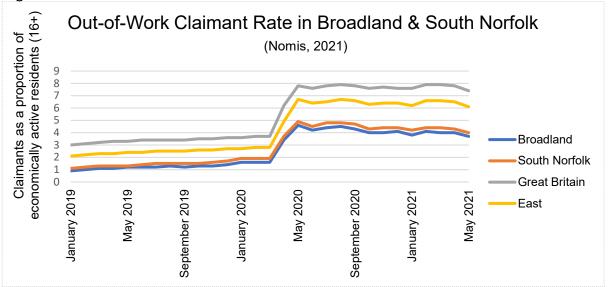
⁵ ONS - Online Job Advert Estimates: June 21 NB: the average weekly graduate vacancy rate was compared across a nine-week period (w/c 05/09/19 – w/c 31/10/19 and w/c 04/09/20 – w/c 30/20/20).

⁶ ONS - Coronavirus and the Latest Indicators for the UK Economy and Society: 28 January 2021

⁷ HMRC - PAYE Real Time Information

⁸ Resolution Foundation - Coping with Housing Costs Six Months On





- 2.2.5 Research by the Centre for Progressive Policy predicted that South Norfolk and Broadland would be amongst the third of local authorities whose economies would fully recover in five years. Additionally, the Joseph Rowntree Foundation has published research suggesting that recovery in our areas will feature in the best 20% of the country.
- 2.2.6 Crucially, this may mean that future targeted support may not go towards our areas (especially in light of the 'levelling up' agenda). This presents a strong rationale for reviewing our current skills and training offer to ensure the Councils are providing a good level of support for those who need it most.

3. Current Position

3.1 The South Norfolk and Broadland Joint Inclusive Growth Strategy (2019)

- 3.1.1 The South Norfolk and Broadland Joint Inclusive Growth Strategy¹⁰ outlined a number of issues relating to skills and training in the local area. These included:
 - A shortage of public sector staff, such as social work and care workers
 - A lack of defined career paths, leading to low aspiration, particularly amongst manual workers
 - Insufficient numbers of graduate level opportunities in Norfolk

⁹ This graph displays ONS data taken from NOMIS, June 2021.

¹⁰ Joint Inclusive Growth Strategy Project Plan

- Disadvantaged pupils in Norfolk are much less likely to access Higher Education (HE) study at undergraduate or postgraduate level than the UK average
- 13% of children in South Norfolk and Broadland are at risk of NEET (Not in Education, Employment or Training)
- A lack of skilled apprenticeships locally, with many being low paid
- Barriers to accessing adult education
- 3.1.2 According to the Institute of Fiscal Studies (IFS), the pandemic has not affected groups equally and is likely to have exacerbated existing inequalities¹¹, such as those listed in the previous section.
- 3.1.3 There has been increased economic disadvantage for young people ¹², with the closure of schools likely to have deepened the socio-economic divide in educational attainment ¹³. The effects of the pandemic have been felt particularly strongly by lower earners, with 80% of those in the bottom 10% of the earning distribution working in either a closed down sector or unlikely to have the option of working from home.
- 3.1.4 This section has outlined the concerning economic context in which we are reviewing our skills and training offer. In order to provide the most effective support to those who have been affected by the pandemic, it is necessary to identify specific cohorts in which to concentrate our efforts.

3.2 Defining Our Cohorts

- 3.2.1 In light of the significant contribution to skills, training and increasing human capital made by other organisations, we have focused on:
 - Targeting specific cohorts of residents who will have been adversely affected by the economic consequences of the pandemic
 - Identifying and targeting gaps in support to avoid duplicating provision, to ensure we help those who would not otherwise benefit from skills and training interventions
- 3.2.2 As such, using the contextual analysis at the start of the paper, combined with a knowledge of local factors affecting our residents, we identified seven initial target groups. Following further refinement, these were narrowed down to four distinct cohorts:
 - School leavers
 - Higher education leavers
 - Recently unemployed including underemployed

¹¹ IFS - Inequalities in education, skills, and incomes in the UK, March 2021

¹² Health Foundation - Generation COVID-19

¹³ IFS, March 2021

- Start ups (Individuals and entrepreneurs looking to start their own business)
- 3.2.3 Appendix 1 outlines our potential target cohorts and the rationale for their inclusion. Additional groups were considered for inclusion, however, these were excluded following further refinement. Existing support or a lack of specificity formed the rationale for not pursuing other cohorts.
- 3.2.4 To ensure the Councils' skills and training offer does not duplicate existing provision, an internal and external mapping exercise was undertaken to identify the support our chosen targets currently receive. This can be found in Appendix 2.
- 3.2.5 As models from the OECD and Office for Budget Responsibility (OBR) on the medium and long-term impacts on the economy, businesses and unemployment rely heavily on assumptions around the success (or otherwise) of the vaccination programme and the level of government support, a summary of the schemes that have been introduced by central government in order to mitigate the impacts of coronavirus on employment are also included in Appendix 2.

4. Proposed Action

- 4.1 Consultations were held with both internal and external stakeholders to understand the impact of their services and identify areas where the Councils could provide additional support. Appendix 3 considers the gaps in provision and sets out a possible response for each identified cohort (See figure 2). The responses are categorised in three ways:
 - Direct delivery by the Councils
 - Signposting / facilitating other skills and training provision
 - Advocacy / influencing

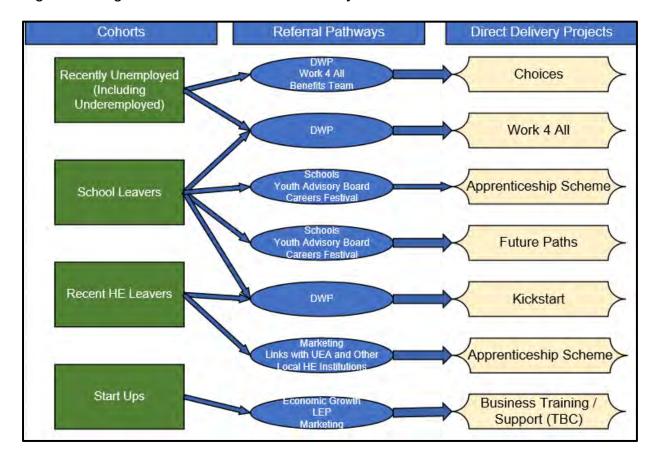


Figure 2. Target Cohorts and Referral Pathways

- 4.2 Appendix 4 provides an outline of the delivery timeline.
- 4.3 The direct delivery projects are:
- 4.3.1 Work 4 All Aim to provide person-tailored support and advice for 150 recently unemployed or underemployed residents by April 2022. The service focuses on practical support such as CV advice, links to other services and information on potential career opportunities.
- 4.3.2 **Choices** Hosted at Carrowbreck, Choices offers focused training provision for 75-100 people, high quality and low throughput over a number of weeks. This is to be retargeted to the recently unemployed and scaled up (without duplicating any existing external provision) to be deliverable from other facilities and across both districts.
- 4.3.3 **Apprenticeship Scheme –** Provide a comprehensive apprenticeship offer, ensuring both Councils utilise their Apprenticeship Levy funding and meet the LGA's requirement (which sees apprentices make up 2.3% of the new entrant headcount). We aim to implement a stretch target to create and develop an opportunity for collaborative apprenticeship working with partner organisations. Post-graduate apprenticeships would also be offered to increase the career paths available to those leaving higher education.

- 4.3.4 Future Paths Provide 15 summer placements within the Councils for 16-18 year olds in the local area who are soon to leave education. We aim to increase this to 30 placements in the second year, with a number of placements hosted by local SMEs once the programme is refined. The programme aims to provide relevant employment experience to residents from a range of backgrounds in order to support future employment opportunities.
- 4.3.5 **Kickstart** Government funded work experience placements for 18-24 year olds who have been out of work for over six months. As of June 2021, we have 36 placements secured, which we hope to increase to 40 within the next few weeks. 15 of the 36 placements are currently in post. We will continue to provide these placements internally and will look to increase the placements hosted at local businesses through our role as a gateway provider.
- 4.3.6 **School career advice** Ensure that young people in our districts receive the best careers advice before starting their careers. Promoting Local Authorities / Government as a realistic and tangible career option, particularly within hard to recruit sectors e.g. planning, environmental health, occupational therapy, social care and promoting opportunities within our businesses in the districts.
- 4.4 A skills and training offer for individuals wishing to start their own business is detailed in the upcoming business support paper.
- 4.5 The availability of existing provision makes the signposting / facilitating element of the Councils' response particularly important. It will be necessary to maintain a strong awareness of the current opportunities in the skills and training arena (such as new online courses and apprenticeship opportunities) and communicate these effectively to those who would benefit.
- 4.6 Similarly, relevant opportunities for business support through skills and training will be disseminated to businesses that would benefit. The weekly business newsletter acts as an important communication channel through which to share this information, in addition to our pre-existing business advice and support functions.
- 4.7 To maximise efficiency and reduce duplication of resource, the establishment of a Skills and Training Project Board is also suggested. The Board will include relevant officers from within the organisation as well as professionals from external organisations, such as DWP and Norfolk Adult Learning. This will achieve the above aim, in addition to increasing signposting opportunities and influence for the Councils in relation to Skills and Training.
- 4.8 A review of the Choices programme is also proposed to ensure it is able to support more people, in particular those most affected by the pandemic.

4.9 Apprenticeships

- 4.9.1 Apprenticeships represent an area of opportunity, both to the training and skills agenda and for the One Team. Reasons for this include:
 - The impacts of the changes to apprenticeship funding that have come into place over the last few years. The introduction of the Apprenticeship Levy has led to a reduction in lower level apprenticeships, apprenticeships in SMEs, the proportion of younger people undertaking apprenticeships and has led to a reduction of over a third in the overall number of apprenticeships offered. It did, however, lead to an increase in graduate level apprenticeships and apprenticeships for those over 25.
 - Training provision and accessing the right training to support apprenticeships in the local area can also be a challenge.
 - The One Team currently has underutilised Apprenticeship Levy funding amounting to approximately £70,000, alongside a number of hard to recruit to professions that support our key services, such as environmental health officers, planners and housing officers.
- 4.9.1 This gives us the opportunity to address these issues and be bold and ambitious in our leadership by creating opportunities for both our residents and our organisation. The key targets outlined in our *One Team Apprenticeship Strategy* are as follows:
 - Meet the Local Government Association target of 2.3% of new entrant headcount as apprentices (April 21 to March 22). This means having 18 apprentices in place across the One Team by March 2022, which is an addition of 10 apprentices (8 apprentices currently in post) on current establishment.
 - Create enough apprenticeships to fully utilise all of our Apprenticeship Levy funding (anticipated to be in the region of 24, depending on the level and length of qualification).
 - Implement a stretch target to create and develop an opportunity for collaborative apprenticeship working with partner organisations.
- 4.9.2 We will focus on developing and delivering training provision and providing apprenticeship places for hard to recruit posts. In other words, we will look to 'grow our own' as part of our talent management approach. We will also provide entry level apprenticeships and a development programme for specialist skills such as improvement professionals. Vacant apprenticeship roles in the organisation will also be open to internal candidates.

- 4.9.3 A barrier to implementing apprenticeships for certain 'hard to recruit' professions is the absence of local training providers. By scaling up our own ambition and working alongside other public agencies facing similar skills gaps, we can encourage training providers to offer courses in our area.
- 4.9.4 Our stretch target will see us employing up to an additional 6 apprentices per authority beyond the available Apprenticeship Levy, with government subsidy of training costs still available for these roles, to help increase the internal capacity in key service areas, generate a talent management pipeline and potentially sell support to other public organisations.
- 4.9.5 We will look to position ourselves in such a way as to take advantage of the pending white paper on lifelong skills announced in the Queens Speech in May¹⁴.
- 4.9.6 To support the accelerating of progress against the development of our apprenticeship workforce, a central apprenticeship budget will be established, which will be comprised of:
 - Existing staffing budget for apprentices in post (circa £178,000)
 - Existing budget for vacant apprentice posts (circa £112,000)
 - Recurring underspends from within directorates funded by increasing the vacancy factor from 2% to 3.5% across all teams, with the exception of waste operations, leisure, CNC and chief officers. This would create additional resource to the apprenticeship budget of £245,000 across the two authorities.
- 4.9.7 Costs to this central pot will be managed 45:55 and will help to ensure that the One Team can:
 - Maximise use of the Apprenticeship Levy while meeting the targets expressed above, along with allowing for resource to manage a more coordinated apprenticeship development scheme, allowing apprentices access to wider work placement experiences and training and development opportunities.
 - Ensure incentives for the organisation in creating new apprenticeship opportunities by taking the budget away from service pressures.

¹⁴ Gov.uk - Prime Minister to revolutionise skills and training opportunities, May 2021

 Ensure that apprenticeship positions are utilised to achieve strategic objectives of creating the right talent flow for the organisation, particularly in hard to recruit areas.

5. Other Options

5.1 Officers considered both no action regarding the skills and training agenda and limiting the scope of our responses. While these options reduced the demand on resources, evidence suggests that as restrictions lift and government support becomes more limited, significant numbers of residents will be in need of support. The scale of the issue as explored in this paper suggests that a larger scale response is required.

6 Issues and Risks

- 6.1 **Resource Implications** The direct delivery proposals within this paper require significant extra resource. The Covid Recovery Plan was approved by Cabinet in June and has allowed us to recruit two staff members to lead on this project. These roles are currently out to advert. We will also source some additional capacity to support with the delivery of the apprenticeship scheme.
- 6.2 **Legal Implications** None
- 6.3 **Equality Implications** This service is designed to have a positive impact on equality outcomes, with the aim of increasing employment opportunities for both inexperienced younger people and older working age adults who may face significant barriers in re-entering the workforce. The support proposed could potentially include individuals who have been out of the workforce for a significant period (such as carers or those with long-term health conditions).
- 6.4 **Environmental Impact** None
- 6.5 **Crime and Disorder** The action described in this report has the potential for a positive impact on crime and disorder. Unemployment is known to have a significant impact on crime rates.
- 6.6 **Risks** There remains a risk that wider economic conditions will increase the scale and nature of the work required. A focus on specific cohorts seeks to mitigate this risk. There is also a risk that changes to government-imposed coronavirus restrictions will impact on our ability to undertake the actions within this paper. This can be mitigated by adopting a flexible approach to delivery, as much of this work can be delivered remotely. A risk register will be monitored on a regular basis to ensure any future risks can be identified and addressed. Additional external capacity to deliver our apprenticeship

ambition will also be required. Such support may be challenging to source given the limited movement in the current market.

7. Conclusion

- 7.1 The issues detailed in this report reflect those outlined by the Inclusive Growth Strategy, with many of the issues exacerbated by the pandemic. With government schemes designed to support both the workforce and businesses concluding in the coming months, it is imperative to ensure appropriate support is in place to support those who need it most.
- 7.2 The proposals detailed in this paper have been designed to maximise the impact of our services and to 'fill the gaps' within existing, local service provision. These proposals meet the needs of each of the target cohorts within a realistic resource constraint. Additionally, the proposals seek to benefit from partners already working in this field to create an effective and comprehensive response.
- 7.3 The successful delivery of these projects, whether directly, through signposting or advocacy, could have a significant impact on the skills and training opportunities available to our local communities.

8. Recommendations

- 8.1. To note the impacts on skills, training and the wider economy in South Norfolk and Broadland and to note the intended approach to tailor our support to specific cohorts of residents and start-up businesses.
- 8.2. To agree to the establishment of a centralised apprenticeship budget comprised of existing apprenticeship posts across all directorates, topped up through increasing the vacancy factor from 2% to 3.5% to generate an additional £245,000 from recurring underspend across both councils.

Appendices

Appendix 1 – Identifying our Target Cohorts

Cohort	Rationale for Consideration	Rationale for Pursuing
School Leavers	 An LGA position paper on this topic reflected on higher youth unemployment as explored earlier in this report, as well as the diminished chances for the 800,000 annual school leavers.¹⁵ A survey carried out by Norfolk and Suffolk County Councils and the LEP¹⁶ highlighted the large number of apprentices who have either been made redundant, furloughed, and/or had a break in their learning. Many apprentices are also unable to complete their end point assessments due to the requirement for face to face conditions. 	Those lacking work experience are at risk of being left behind in terms of employment and income. The reduction in apprenticeships and risk of job blocking from graduates forced into non-graduate level work makes this cohort a key target group for support.

LGA - Rethinking Youth Participation
 New Anglia LEP - Impact Report

Young HE Leavers	 The number of new applicants to University during the initial lockdown period (23 March to 30 June) was 17% higher than in the same period in 2019. There was also a 30% increase among home students with an even larger increase in mature applicants. This suggests that the pandemic has led to a sharp increase in the number of people applying to university. According to the Resolution Foundation, one year after leaving full-time education, over one-third of non-graduates and one-in-five graduates were working in sectors currently 'closed down' 17. Additionally, research suggests that graduate jobs have reduced by 11% year-on-year 18. While universities provide careers support to their graduates, they are unable to provide extensive advice on employment opportunities outside of their local area. This presents a challenge for graduates trying to identify suitable opportunities in the Norfolk area. 	Graduate employment is a distinct problem when compared to overall unemployment of young people and as such, a specific response is required. The large increase in graduates suggests that the issues discussed are likely to continue beyond the pandemic.
Recently Unemployed (Including Underemploy ed)	 According to the Centre for Ageing Better¹⁹, workers aged 50+ who had their work disrupted during the first lockdown (by reduced hours, for example, or being furloughed), were significantly less likely to have returned to work as normal in the autumn than younger workers (53% compared with 68%). Recent figures have shown that over 50s are twice as likely to fall into long-term unemployment once they lose their jobs, compared to younger workers. 	This makes this group a key target for us to support following the end of furlough. This group may be unfamiliar with the modern job application process or may be less confident with IT. Both factors could significantly hinder their job search, despite being experienced workers.

Resolution Foundation, May 2020
 High Fliers Research - Graduate Market 2020
 Centre for Ageing Better - Labour Market Data

Start Ups

- Existing businesses (large and small) have been in receipt of a range of support measures
 from national and local government as well as the LEP. With furlough tapering off until
 September, businesses should be fully open by this cut off point, meaning that they should not
 require additional Covid related support.
- This year is expected to see a record number of companies created, with the creation of just under 85,000 in 2020²⁰. This follows a trend of increased entrepreneurship following previous recessions, such as the Great Recession in 2008/09.

Previous recessions have seen a surge in entrepreneurship, driven by high levels of unemployment and a rebalancing of the economy. We are also more likely to have a large impact on this cohort with relatively small interventions, as many will have no experience of running a business.

Appendix 2 – Internal and External Provision

Support	Project Name	Status	Summary							
Direct Delivery	Broadland Training Services	Mostly inactive due to the pandemic. Plan to restart when safe	Offers IT, first aid and other courses from Carrowbreck House in Hellesdon. First aid provision is continuing (as it is excepted under covid restrictions).							
	Choices Programme	Mostly inactive due to the pandemic. Plan to restart when allowed within restrictions	Aiming to give people who are long-term unemployed the skills they need to re-enter the labour market. Working with a small cohort of long-term unemployed residents, the scheme supports with employment skills, alongside intensive support and signposting into a range of services where appropriate							
	Staff Bank	Currently implementing	A bank of potential staff for various Council teams with transferable skillsets, in order for the Councils to meet short term resource needs, in addition to providing employment							

²⁰ Smallbusiness (Oct 2020) - 2020 set to be record year for new companies created

	Future Paths	Inactive (implementation delayed due to COVID-19)	Scheme offering summer internships to GCSE aged pupils. Rounded placements in Council teams, alongside additional skills training, including CV writing and interview experience. Will also support interns in their future career, providing advice and guidance
	Tots 2 Teens	Inactive (will restart when safe to do so)	Holiday activities for children aged five years and upwards during school holidays, focussing on skill development. Activities are held throughout the Broadland area. To be eligible, children must live or go to school in Broadland. There are large discounts for those in receipt of certain benefits. The aim is also designed to help those who could not afford childcare to continue to work over school holidays
	School careers advice	revamping	Schools' careers ambassadors who can provide role models and practical knowledge and experience to students. Staff will be recruited from across the Council, taking time from their normal roles to work with students. It is envisaged that each ambassador will allocate around 30 hours per year. Ambassadors can come from all areas of the Council but will be particularly targeted in hard to recruit careers such as Environmental Health, Planning, Building Control to help promote these sectors as careers options. However, the key characteristics will be able to engage with young people in a meaningful way.
	Kickstart ²¹	Active	National scheme for young people who have been out of work for 6 months. We will be a gateway provider (providing placements of our own as well as organising placements at local businesses). As part of this, we will also be doing extra training, charging employers for this and providing pastoral support
Signposting / Facilitating	Integrated Employment Project (Work 4 All)	Starting in January 2021	Two staff refocussed (former benefits officers) to work with people who are unemployed to get them back into employment. Signposting into employment, identifying support needs, linking with training. DWP have two youth coaches in the Help Hub working alongside, focussing on young people to work on this project.
	Norfolk Skills and Careers Festival	Will restart after COVID-19	Annual event at the Norfolk Showground, allowing young people and local organisations the opportunity to interact on skills and careers, with the aim of inspiring young people. We hosted a stand offering information on local authority careers for young people at the last festival.

²¹ UK Government - Kickstart Scheme

	NGDP	Active	South Norfolk and Broadland currently work with the NGDP, the national local government graduate scheme. There are currently two graduates on the scheme employed by the Councils						
	Jarrold Assessment Centre	Not run this year due to COVID-19	Offers secondary school children in Norfolk a taste of assessment centre style interview processes through a full day session. South Norfolk have supported local children to take part in this programme previously						
	LIFT	Completed project, with funding now reallocated	Grants from EU funding (plus some match funding) that are aimed at smaller voluntary community and social enterprise organisations (based in Norfolk or Suffolk) who help people furthest from the jobs market						
	Future Booster	Completed and led to successor project of SMILE, (Not funded by SNC / BDC)	A series of workshops focussing on self-esteem and building resilience in secondary school children in Reepham. Has led to a project (SMILE) which will be delivered virtually across Broadland to support young people aged 15-19 (up to aged 25 if additional needs) with career guidance, practical access to employment support and/or support to address low self-esteem and confidence barriers to progression or aspiration. The project is live until August 2021						
	Young Active Enterprise		Young Enterprise is a national charity that works in partnership with local schools, businesses and volunteers to inspire and equip thousands of young people each year to learn and succeed through enterprise						
Advocacy/ Influencing	Apprenticeshi ps Network Norfolk	Active	Works collaboratively with providers, employers and partners to promote the profile & growth of apprenticeships across the county. Maintain a register of available apprenticeship roles for Norfolk. We engage with this group through the Skills Officer						
	LEP Sector Skills Plans	Active – Being implemented	New Anglia Local Enterprise Partnership worked with sector partners to develop skills plans for the key growth and employment sectors in our region. They identify the main skills needs of each sector and agreed actions to help meet these needs						
Other External Provision	LEP Start Up Programme	Active – provision is similar to pre-pandemic	This is ideal for entrepreneurs and micro-businesses at pre-launch and during early stage development, providing them with tailored advice and workshops covering topics such as business plans, management and operational systems, marketing, finance and legal, corporate social responsibility, and intellectual property rights. Delivered by LEP Business Advisers at the Growth Hub.						

Community Challenge Fund	Active	Some charities or social enterprises are eligible for the Community Challenge Fund, ran by NALEP. This supports projects that help improve the life chances of disadvantaged people in our society.							
I Can Be A	Online tool supported by an active programme	This is a free careers inspiration tool focused on helping 12 to 25-year-olds in Norfolk and Suffolk and which helps deliver the New Anglia Youth Pledge objectives. The site provides tools such as Career Wizard and a database of Job Ideas to guide young people in choosing a career path. It also provides resources such as virtual tours, employee case-study videos and tips and tools for CV building and interview preparation, both through the website and in person through its charitable remit.							
Go Digital Funding	Closed on the 31st March	The free scheme is designed for micro, small and medium sized businesses based in Norfolk who want to make better use of digital tools to help them grow Go Digital Link							
Help to Grow Scheme	In implementation stage	£520m has been pledged to fund free MBA-style management training courses for small businesses to improve productivity. The training will be delivered by business schools and will fund a 50% discount on software that enhances productivity							
JETS Programme	Active	A government funded scheme supporting individuals receiving "Universal Credit and New Style Jobseeker's Allowance who have been unemployed for at least 13 weeks", during the pandemic. Support includes CV help, workshops and interview coaching, financial assistance for work clothes and advice with identifying transferable skills and matching these to growth industries							
Apprenticeshi p Levy Transfer Scheme	Active	New Anglia LEP's Apprenticeship Levy Transfer Scheme allows an organisation's unspent funds to be transferred to local SMEs so they can offer training opportunities and jobs to people who are not in work. This aims to maximise the amount of Apprenticeship Levy funding spent in the local area							
University Career Support Services	Throughout university and following graduation – most support services have moved online	Most universities offer careers support programmes to graduates which normally last for a number of years following graduation. Graduates are offered careers guidance, CV and application advice as well as access to numerous resources online (psychometric testing, practice interviews etc). UEA Careers Centre are active across Norfolk, through Gateway to Growth, the UEA Award and their internship programme							

Other External Provision	National Funding for Traineeships	Funding proposed in the Budget - in the process of implementation	The Chancellor has pledged £126 million to develop the traineeship scheme, which will see businesses paid £3,000 instead of £2,000 per trainee. A "flexi-job" apprenticeship will also be created to allow apprentices to gain experience with various employers within a sector
	City College / Easton and Otley College	Closed during education lockdowns, currently providing services	The primary providers of vocational education in Norfolk, covering a range of qualifications from GCSE to degree level
	Gateway to Growth	Active	The project aims to boost engagement between graduates and Norfolk's Small and Medium Enterprises (SMEs) through internships and enhanced skills training linked to Norfolk's Enterprise hubs. The project addresses some of the problems faced by Norfolk's economy and UEA graduates who want to remain in Norfolk after graduation but struggle to secure graduate level employment
	SWAP	Implementation Phase	Sector-based Work Academy Programme – Six-week placements for those on Universal Credit (including guaranteed interviews for permanent employment) to prepare those receiving unemployment benefits to apply for jobs in different sectors ²²
	CHANCES	Active	Offers support to vulnerable people including those with health conditions across Norfolk who receive a range of out of work benefits and who need significant support to move back into work
	RESTART	Active	RESTART is a national scheme which aims to give Universal Credit claimants who have been out of work for at least 12 months enhanced support to find jobs in their local area
	Lifelong Loan Entitlement to higher education and training	Ready to implement	The government's Skills and Post-16 Education Bill includes a Lifelong Entitlement for adults to use on higher education or training at any point during their life. This entitles adults to receive equivalent of up to four years' worth of student loans for level 4-6 qualifications.

²² UK Government - Sector-Based Work Academy Programme Guide

Other External Provision	£500 million for adults to gain A-level equivalent qualifications	Active	11 million adults can gain an A level-equivalent qualification for free. The devolved administrations will receive £500 million through Barnett consequentials as responsibility for skills is devolved.
	The Turing Scheme	Active (taking place from September 2021)	The government introduced a new international educational exchange scheme named the Turing Scheme. This £110 million scheme replaces Erasmus which UK students can no longer take part in. It allows young people across the UK, particularly those from disadvantaged backgrounds, to work and study across the world.

Appendix 3 – Mapping our Skills and Training Offer

Cohort (Breakdown, Estimated Number etc.)	External Provision	Identified Gaps		Potential Response									
			Direct Delivery	Signposting / Facilitating	Advocacy / Influence								
School Leavers There are roughly 2,260 18-year olds in our areas that leave school each year, of which 540 go into employment and 135 into apprenticeships Around 90 16-year olds go straight into employment following KS4, with 115 going onto apprenticeships.	I can be a Apprenticeship Levy Transfer Scheme Apprenticeships Norfolk City College courses Increased national funding for traineeships Voluntary Norfolk Young Person's coaching (at maximum capacity)	The tight labour market will lead to more experienced workers taking jobs at lower levels. This will push school leavers out of the labour market, with the Kickstart scheme only working with those that have been NEET for 12 months. Additionally, DWP support is mainly targeted at ensuring young people secure employment, rather than finding a job they would enjoy. Young people are in need of general careers guidance to help them make decisions about their future.	 Apprenticeship scheme Future Paths Integrated employment scheme (Work 4 all) Choices Tots 2 Teens Kickstart 	 Jarrolds Community Challenge Fund Future Booster (SMILE) Apprenticeship Levy Transfer Scheme Continued engagement with the Norwich Employability Network to identify relevant opportunities 	Apprenticeship podcasts Norfolk Skills and Careers Festival	 Local businesses DWP Apprenticeships Norfolk 							

	Government's Lifelong Loan Entitlement for adults to use at any point during their life on higher education or training Government's Turing Scheme					
Young HE Leavers Based on available data, we estimate up to 250 residents aged 21-24 fall into this category (will increase with the new cohort in September)	University careers services provide general advice, guidance and training for students and graduates (length of time graduates are able to access these services following graduation varies)	Awareness and availability of graduate-level opportunities in the Norfolk area, especially for graduates from non-local universities	 Replication of a programme similar to 'Gateway to Growth' Public Sector Graduate Scheme 	Continued engagement with the Norwich Employability Network to identify relevant graduate-level opportunities UEA Internship Programme	Gateway to Growth Steering Group	 UEA 'Fireside group' Local public sector bodies (as part of a PS Graduate Scheme) Chamber of Commerce LEP

Recently Unemployed (Including Underemployed)	 DWP Job Coaches A range of free qualifications have been available for adults as part of the government's Lifetime Skills Guarantee²³ People who have been out of work of 6-12 months out of work. M support goes towards newly or long-term unemployed. 	Choices Programme Staff Bank Job Search Facilities Work4All Work4All Range of support from New Anglia LEP CHANCES Engagement with the Norwich Employability Network to identify relevant opportunities	Help Hub DWP
Start Ups 90% of South Norfolk and Broadland businesses are SMEs Pre-pandemic, roughly 1,000 businesses a year were created in our districts	 Broadland Business Start-Up Grants (£700) Broadland Broadland Business Essentials Course (Free two-day start up workshop) MBA style management training National business functions has focussed upon support for existing businesses, rather that supporting entrepreneurship. Recessions are often followed by significant growth in enterprises 	 Training courses Broadland Business Start-Up Grants (£700) Business Essentials Course (Free two-day start up workshop) Range of support from New Anglia LEP Help to Grow 	LEP Sector Skills Groups Sector Groups (NAAME etc.)

²³ Launch of free qualifications for adults - gov.uk

Appendix 4 – Delivery Timeline

Projects	Apr -20	May- 20	Jun- 20	Jul -20	Aug- 20	Sep- 20	Oct -20	Nov- 20	Dec- 20	Jan -21	Feb- 21	Mar- 21	Apr -21	May- 21	Jun- 21	Jul -21	Aug- 21	Sep- 21	Oct -21	Nov- 21	Dec- 21	Jan -22	Feb- 22	Mar- 22	Apr -22	May- 22	Jun- 22	Jul -22	Aug- 22	Sep- 22
Work 4 All	Officers Refocused											Programme Runs																		
Choices													Review & Expansion Programme Ru							Runs	3									
Apprentic -eship Scheme											Development & Real Partnership Work			LGA quirem Met	nent	Apprenticeship Levy Utilised			Programme Continues											
Kickstart								0)ngoing	j - Fu	ınding	Ends i	in De	cembe	er 2021									Schei conclu						
Future Paths												Marketing, Preparation and Selection							gramr Runs	me										
Business Training Offer TBC										Pro	Proposal Agreed Programme Runs																			



Agenda Item: 10 Cabinet 19 July 2021

Emergency Planning structures

Report Author(s): Nick Howard

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Portfolio: Leader

Ward(s) Affected: All wards

Purpose of the Report:

To present for decision proposals for emergency planning structures to provide a strong emergency incident response when our local communities are faced with a serious emergency threat. Specifically, a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response which will require an additional annual revenue budget allocation of £13k revenue and £2k equipment, tools and clothing annually.

Recommendations:

1. Cabinet to agree to establish a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response to defined serious emergency incidents, at an additional annual revenue cost of £13k revenue and £2k equipment, tools and clothing annually borne 45% BDC / 55% SNC.

1. Summary

- 1.1 Our councils have formal emergency planning responsibilities under the Civil Contingencies Act 2004 and we maintain operational emergency plans. These plans include advance planning of mechanisms for responding to protect our local communities from serious threats. Emergency plans are updated over time, in particular to reflect changes in organisational arrangements and/or learning from emergency incidents.
- 1.2 Severe weather involving heavy and persistent rainfall over 23-26 December 2020 caused serious surface water flooding and consequential river flooding locally, the worst impacts on this occasion being evidenced in South Norfolk district.
- 1.3 As officers update our operational emergency plans, a strong value has been identified in augmenting our emergency planning mechanisms with a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response to the scene of a serious incident, working with local people and partner agencies to prevent or mitigate impacts and demonstrating emphatically and visibly our commitment and support. Our councils are not blue light services, nor are they the primary flooding authorities, but we have good knowledge of our local communities and their vulnerabilities and are adept at resourceful problem-solving using local knowledge.
- 1.4 Specifically, in relation to flooding, a funded out-of-hours emergency incident officer would offer a pre-planned and guaranteed response:
 - a. receiving and handling warnings and alerts from partner emergency responding agencies
 - travelling to and working at the scene of localised flooding to rapidly assess the threat and identify the most rapid, safe and comfortable support for affected residents
 - c. providing eyes-on coordination with wider council services and local elected members.

2. Background

2.1 District councils are Category 1 responders under the Civil Contingencies Act 2004. The government published in March 2021 an integrated review of security and resilience requirements, The Integrated Review will inform future policymaking for all national government departments, and whilst it focuses primarily on security it includes commitments to protect our communities from weather- and climate-related impacts. As Category 1 responders, district councils maintain operational emergency plans catering for foreseeable emergency incidents and making advance arrangements for responding to them. Emergency plans are updated regularly in light of changes in organisational structures and services, local emergency threats (severe weather/flooding and other major incidents), and significant learning points.

- 2.2 Local communities and infrastructures in Broadland and South Norfolk districts are exposed to a range of potential threats. The most common threats likely to face our local communities are: severe weather, utility failures, river/ surface water flooding, serious environmental pollution incidents, and transport accidents.
- 2.3 Severe weather involving heavy and persistent rainfall and consequences over 23rd to 29th December 2020 caused serious surface water flooding and consequential river flooding across significant parts of England from Gloucestershire through to Norfolk. Broadland district was significantly affected however the worst impacts on this occasion were evidenced in South Norfolk district. If the weather system had moved differently, the impacts in both districts could have been reversed as they are similarly vulnerable to flooding. The impacts on residents and some businesses in key affected locations were severe and lasting, with some residents understood to still be displaced from their homes.
- 2.4 The severe wet weather led to flash flooding and ditch / river flood threats arose posing very high demands on a small number of staff. Generally these demands arose in people's own time (annual leave, bank holidays, non-working days and antisocial hours). Those demands comprised:
 - a) a high volume of SNC emergency out-of-hours call reception and response
 - b) staffing of sustained multi-agency incident coordination
 - c) activation and staffing of an SNC help hub
 - d) field deployment (rapid business support visits, sandbagging).

3. Current position

- 3.1 For the purposes of this report it will be helpful to reference as an example how council services responded during the December 2020 weather and flooding emergency incident. The emergency response provided to meet the needs of local communities was a credit to both councils, working alongside partner agencies, however our councils had no resourced capacity to mount an immediate on-site emergency incident response. Instead, initial incident emergency coordination with partner agencies was conducted by teleconferencing. It should be noted that very substantial support was also mobilised by the council's community help services remit to assist and advise affected local people, and delivering emergency support ranging from sandbag supplies and skips to temporary accommodation and hardship assistance.
- 3.2 The demands of the December 2020 emergency incident and limitations of existing emergency response capabilities were felt strongly by the officers who gave up much of their time, often working long hours and through the night in highly pressurised circumstances, through the Christmas period. A very large and challenging telephone call volume fell in a short time on one unpaid coordinating officer who, whilst supported by others, was faced with serious impacts. The incident triggered after council services had closed on 22nd December 2020 and much of it was concluded before daytime council services resumed following the Christmas break.

3.3 At present our councils do not resource an out-of-hours emergency incident response to any serious threats arising to our local communities. District councils are not obliged to offer a resourced manned out-of-hours emergency call handling or incident response service. The rapid mobilisation of a physical presence, unique contribution and visibility of council services during a major emergency incident such as localised flooding can provide a strong demonstration of close care and support for our communities. In the context of some recent local experience outlined above in this report, an early decision on emergency planning structures going forwards would enable officers to best support local communities when they face future serious emergency threats including severe weather and localised flooding.

4. Proposed action

- 4.1 Based on the current position above, it is proposed that our councils jointly establish a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response to defined serious emergency incidents. Sharing the benefits and costs of this is a clear and tangible example of how the collaboration between Broadland District Council and South Norfolk Council can deliver more together efficiently and offer high support and reassurance to local people.
- 4.2 The cost would comprise of a weekly gross standby payment and an allowance for a payment for call-out to major incidents. It is impossible to predict precisely when and how much time will be involved in future incidents, however the budget of £15k is proposed and this report and the proposals are intended to reflect the vision and ambitions in the collaboration between Broadland District Council and South Norfolk Council. This payment would form part of those officers' contract of employment and is therefore being discussed with UNISON with a view to formal negotiation should this be approved by Members.
- 4.3 The role of the Emergency Incident Officer as proposed would cover three main action-centred areas numbered (a) to (c) below, together with three supporting roles numbered (d) to (f).
 - a) To provide the initial call receipt and point of contact for other agencies regarding emergencies in the district. The Emergency Incident Officer would make an assessment on whether he/she needs to attend the scene and whether other council resources are required.
 - b) To attend emergency scenes under defined response commitments and/or when requested by other agencies or the officer's own determination. Once on-scene, to assess the incident and whether additional council resources are required.
 - c) To provide a visible and constructive physical presence working with local people and partner agencies to best respond t this incident without taking unacceptable risks. NB: We do not aim to replicate or disrupt any other agency's remit and responsibilities.
 - d) To brief the senior officer on actions taken at incidents and discuss/advise on whether further council action is required.

- e) To represent the Council at the Tactical Coordinating Centre (Silver) if such a facility is opened for a major incident, dependent on severity and scale of incident.
- f) To act as staff officers/advisors to senior officers either at the council's coordinating base or at the nominated joint agencies coordinating centre.
- 4.4 The Council would look for approximately eight officers to volunteer to be trained and rostered to provide the basic cover on a one week in eight basis (although alternative cover arrangements would apply during the Christmas and New Year holiday period). The Council would also look for several officers would also provide support to the main rota as reserves who could cover for absences.
- 4.5 A senior officer would always be 'on call' on a rota system to provide senior decision making in support of the emergency incident officer. This would not require any additional payment.

5. Other options

- 5.1 No other specific options have been identified to meet the community needs and achieve the same outcomes addressed in this report.
- 5.2 Cabinet could decide to approve an alternative, reduced or enhanced capability compared to that proposed.

6. Issues and risks

- 6.1 Agreeing to the proposal to establish a resourced 24/7/365 emergency incident response does not lead to any new identified issues or risks beyond those inherent to the council's role as a Category 1 responder agency.
- 6.2 Cabinet could decide not to establish this capability. Not establishing the capability would leave an untenable position in the event, however frequent, of a major incident where burdensome responsibilities fall informally on specific individuals outside the terms of their employment. This would not be a safe and assured way of delivering future emergency responses.
- 6.3 Cabinet could decide to defer a decision. Deferring the decision would risk leaving present arrangements in place during any major emergency incident such as severe weather or flooding arising in the future. There are significant weather-related localised emergency incident impacts occurring more frequently in the U.K. and, following the December 2020 incident, a decision now would be favourable.
- 6.4 **Resource Implications** –The proposals in the recommendation would require an additional revenue expenditure commitment of £15k per annum.
- 6.5 **Legal Implications** No implications have been identified.
- 6.6 **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.
- 6.7 **Environmental Impact** The proposals contained in this report would support and enhance protection of the environment during major emergency incidents, and are beneficial.
- 6.8 **Crime and Disorder** No implications have been identified.
- 6.9 **Risks** The proposal is favourable to risks facing our communities and neutral in terms of creating any new risks. An early decision whether or not to approve the establishment of this capability will enable recruitment, until which time the council has no resourced staffing capability to respond in the way described, however this is not a statutory requirement. All other districts in Norfolk have paid duty officer rotas with varying degrees of response to an emergency incident.

7. Conclusion

7.1 The establishment of a capability as per the recommendation is the preferred option because it offers a resourced and reliable capacity together with the effective and efficient, visible response and work of our councils during the initial emergency phase of a local major incident.

8. Recommendations

8.1 Cabinet to agree to establish a 24/7/365 Emergency Incident Officer scheme offering a guaranteed response to defined serious emergency incidents, at an additional annual revenue cost of £13k revenue and £2k equipment, tools and clothing annually borne 45% BDC / 55% SNC.

Background papers

- 1. Civil Contingencies Act 2004
- 2. Integrated Review report, March 2021.



Agenda Item: 11 Cabinet 19 July 2021

Insurance Contract – Request for Delegation to Award

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Portfolio: Finance

Ward(s) Affected: All

Purpose of the Report:

To agree a Cabinet delegation to be able to award a new insurance contract.

Recommendation:

To delegate authority to the Assistant Director of Finance, in consultation with the BDC Portfolio Holder for Finance and the SNC Portfolio Holder for Finance and Resources to award a new insurance contract.

1. Summary

1.1 BDC and SNC are currently in the process of tendering for a new joint insurance contract. The compressed timeline means that current Cabinet dates do not correspond with the date that we require sign off of the chosen contractor(s). We therefore wish to request a Cabinet delegation for officers to award this contract.

2. Background

2.1 Both BDC and SNC were working with the LGA to help develop an insurance mutual offering. However it has not proved possible to progress with this at this time.

- 2.2 Both Councils therefore need to progress with a compressed re-procurement of insurance cover. Both the current BDC and SNC insurance contracts end on 30 September 21.
- 2.3 The Council has the following main insurance covers:
 - Property
 - Terrorism
 - Employers Liability
 - Public Liability
 - Officials Indemnity
 - Professional Indemnity
 - Crime
 - Personal Accident
 - Computer
 - Engineering Inspection and Business Interruption
 - Motor Fleet

And the cost of insurance is c£400,000 for SNC.

2.4 The Contract Procedure Rules require Cabinet approval for the award of tenders / quotations above £100,001.

3. Timetable

3.1 The following table sets out the current timetable.

Stage	Date
Tender documents issued	24 May 21
Deadline for receipt of submissions	5 July
Evaluation of tender submissions	6 July - 2 August
Earliest possible award decision	Early August
Latest possible date to notify successful and unsuccessful bidders of tender outcome	3 September
10 day legal standstill period ends	13 September
Contract commencement date	1 October 21

- 3.2 The key dates to note are that:
 - The tender evaluation will not be completed until at the earliest early August (and if there is any slippage this may not be until mid / late August) and
 - We need to provisionally award by early September.
- 3.3 This means that we are unable to report the outcome to either the August cycle of meetings (SNC Cabinet 9 Aug) or the September cycle (SNC cabinet 13 Sep).

4. Award Criteria

4.1 The following table sets out the Award Criteria

Price	Total Cost	50%
	Financial Certainty	5%
Quality	Cover	30%
_	Service Delivery	5%
	Claims Handling	5%
	Additional Value	5%
		100%

5. Options

- 5.1 There are 2 options as follows:
 - Hold a special Cabinet meeting during the mid-August early September period.
 - Delegate the award decision.
- 5.2 It is not feasible to delay the award as we need insurance cover to be in place from 30 September.

6. Issues and risks

- 6.1 **Resource Implications** It is necessary to ensure insurance cover is maintained.
- 6.2 **Legal Implications** Given the value of the insurance cover it is necessary to comply with a full and open procurement process.
- 6.3 Equality Implications None
- 6.4 Environmental Impact N/A
- 6.5 Crime and Disorder N/A
- 6.6 **Risks** The procurement timetable is tight as we have had to adopt a compressed timeline. To mitigate this risk we are following good project management processes.

7. Recommendations

To delegate authority to the Assistant Director of Finance, in consultation with the BDC Portfolio Holder for Finance and the SNC Portfolio Holder for Finance and Resources to award a new insurance contract.

Background papers

None



Agenda Item: 12

Cabinet

5 July 2021

Pensions Discretion Policy

Report Author(s): Emma Hodds

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Portfolio: Finance and Resources

Ward(s) Affected: All

Purpose of the Report:

The Council is required by law to create a pensions policy in relation to the discretions under the Local Government Pension Scheme. This policy is linked to the One Team terms and conditions and it is appropriate for the same pensions discretions to be awarded.

Recommendations:

Cabinet to approve:

1. The Councils Pension Discretion Policy.

1. Summary

1.1 The Council is required by law to create a pensions policy in relation to the discretions under the Local Government Pension Scheme. This policy is linked to the One Team terms and conditions and it is appropriate for the same pensions discretions to be awarded.

2. Current position

- 2.1 The Council has a legal responsibility to ensure that this policy is in place and up to date. The current policy has not been reviewed for some time; hence the policy being presented as a new policy.
- 2.2 As with all policies the discretions should be reviewed from time to time to ensure that current thinking is reflected. Any revisions should then be shared with the Norfolk Pension Fund to ensure correct interpretation and application where this might apply for the One Team.
- 2.3 In setting this policy, consideration has been given to:
 - Cost discretionary powers come with a cost attached and need to be affordable
 - The basis upon which decisions are made so that the policy is not rigid
 - Equality thereby ensuring criteria does not discriminate and that decisions are justifiable
- 2.4 The policy has also been discussed with the Staff Consultation Forum, which includes UNISON representatives and staff representatives.

3. Proposed action

- 3.1 The policy, as attached at **Appendix 1** to this report, sets out in tabular format the employer discretion, the description of this, the associated regulation and how this will be applied in policy.
- 3.2 This approach makes it clear how each regulation will, or will not, be applied by the Council, thus ensuring that clarity is provided for all staff in such circumstances.

4. Other options

4.1 Not applicable in this regard as it is a legal requirement to have such a policy.

5. Issues and risks

- 5.1 **Resource Implications** the policy has been drafted to ensure that the policy is affordable and is mindful of the use of public funds.
- 5.2 **Legal Implications** the policy has been written in line with the regulations.
- 5.3 **Equality Implications** the policy has been written to ensure that the criteria does not discriminate and that decisions can be objectively justified.
- 5.4 **Environmental Impact** not applicable to this report.
- 5.5 **Crime and Disorder** not applicable to this report.

6. Conclusion

6.1 Cabinet are requested to approve the attached policy as this is in line with the regulations and ensures that the Council are clear about the interpretation of the regulations.

7. Recommendations

7.1 Cabinet to approve the Councils Pension Discretion Policy.

South Norfolk and Broadland Councils Discretionary Policy

Introduction & Context

The Council is required by law to review or create a pension policy in relation to the discretions under the Local Government Pension Scheme.

In becoming One Team from January 2020 it is appropriate for the same pension discretions to be awarded to employees regardless of employer.

It is a requirement that the Councils policy shows the basis on which we would make decisions on various discretions. The government has advised employers should not 'fetter their discretion' i.e. policies should not be so rigid or restrictive as to prevent flexibility where a (possibly unanticipated) situation requires it. There are compulsory items which must be included as well as a number of non-compulsory items. It is recommended that non compulsory items are included in any published policy.

As with all policies the discretions should be reviewed from time to time particularly when other Council policies are updated/amended to ensure the discretions reflect current thinking. Any revisions should be published and shared with the Norfolk Pension Fund within one month of changes being made

Please be aware it's also a legal requirement for the Council to have regard to the extent to which the exercising of agreed discretions might lead to a serious loss of confidence in the public service.

Pension Discretions Applicable from April 2014

In setting and reviewing its discretion the Council has considered

- Cost discretionary powers come with a cost attached all Council policies must not lead to a loss of confidence in public services, therefore they must be affordable
- Basis on which decisions are made policies should not be so rigid or restrictive
- Equality criteria that do not discriminate and where decisions are objectively justified.

The Council has limited resources and needs to maintain a balanced budget therefore discretions are only exercised in exceptional circumstances

Mandatory Discretions as per Reg 60(1) of the LGPS Regulation 2013 and Reg 66(1) of the LGPS (Administration) Regulations 2007.

Employer Discretion	Description	Regulation	SNC/BDC Policy
Funding of Additional Pension	An employer may fund wholly, or in part, a member's additional pension contract. The payment can be paid by regular contributions or a lump sum.	16(2e) 16 (4d)	The Council does not make such voluntary contributions to members APCs
Awarding Additional Pension	An employer may increase a member's benefits by awarding additional pension up to a maximum of £6,500 p.a. from April 2014. This amount is subject to an annual increase each April.	31	The Council does not make such voluntary contribution
Flexible Retirement	An employer may give consent for a member aged 55 or more who reduces their grade or hours of work (or both) to receive all or part of their LGPS benefits immediately, even though they haven't left its employment.	30(6)	The Council will consider each flexible retirement case on its merits where an employee has reduced their hours by at least 25% and/or their salary. Please refer to the agreed Retirement Policy for further details. Under normal circumstances the Council will not fund any additional strain costs.
Waiving of Actuary Reduction	If the benefits payable on retirement before normal pension age would normally be reduced for early payment, the employer may agree to waive all or part of the reduction.	30 (8)	The Council will not waive any actuarial reduction in normal circumstances

Early Payment of Pension: Regulation 30 LGPS (Benefits, Membership and Contributions) Regulations 2007 (Two decisions to be made)	An employer may give consent for a member aged 55 or more who has left its employment prior to April 2014 without an entitlement to immediate LGPS benefits to receive them straight away regardless.	30	In normal circumstances the Council will not agree to the early release of pension benefits
	If the benefits payable would normally be reduced for early payment, the employer may agree to waive all or part of the reduction.		In normal circumstances the Council will not authorise the waiving of all or part reductions due to early pension release.

Non-Mandatory Pension Discretions

Employer Discretion	Description	Regulation	SNC/BDC Policy
Membership Aggregation	A member who transfers from another LGPS employer, either directly or after a break, must have their two periods of membership aggregated provided they do so while still an active member in the new post. The member has twelve months from the aggregation to opt to keep their periods of membership separate.	22(7b) (8b)	The Council do not extend the normal time limits, except in exceptional circumstances where it may be reasonable i.e. there is evidence that an election was made but did not reach the Pension Fund in time.
Shared Cost AVCs	An employer may contribute towards a Shared Cost AVC Scheme, i.e. an	17(1)	The Council do not contribute to any shared cost AVC.

	AVC Scheme into which the employer pays contributions as well as the member.		
Forfeiture of Pension Rights	If a member leaves as a result of a conviction for an offence in connection with their LGPS employment or as a result of their own criminal, negligent or fraudulent act in connection with that employment, the employer has discretion (within the terms of these three regulations) to direct all or part of their LGPS pension rights should be forfeited and / or paid over to the employer or specified dependants of the member.	91, 92, 93	The Council will consider each case individually should this situation arise
Appointment of Adjudicator for Member Disagreements	There is a three- stage dispute procedure for members who disagree with any LGPS decision made by their employer. The first stage is handled by the employer. Employers must appoint an Adjudicator. You may appoint internally or externally. In every notification of any decision made under the Regulations must inform the person concerned of the job title and address of the person appointed under	74(1)	In the event of any disagreement the Council would follow the Dispute Procedure in operation at the time

	T		1
Transfers of Pension Rights	Regulation 74(1) to whom any application may be made for adjudication A member who has previous pension rights in a different pension scheme* may transfer them into the LGPS provided they opt to do so within twelve months of joining it.	100(6)	The Council do not extend the normal time limits, except in exceptional circumstances where it may be reasonable i.e. there is evidence that an election was made but did not reach the Pension Fund in time.
Members' Contribution Rates	Employers have to allocate members into the appropriate contribution band at the beginning of each financial year. If a member's pay moves into a different band during a financial year, the employer has discretion to implement the new band immediately but may prefer to wait until the next annual review	9(3)	The Council's Pensions policy explains how employee's contribution bands are assessed
Absence Contribution Time Limit: LGPS (Administration) Regulations 2008	A member who has been away from work prior to 31st March 2014 as a result of maternity, paternity or adoption leave, industrial action (mainly strikes) or unpaid leave of absence has the right to pay voluntary pension contributions to cover the period of absence. Their request to do so normally has to be made within 30 days	22(2)	The Council do not extend the normal time limits, except in exceptional circumstances where it may be reasonable i.e. there is evidence that an election was made but did not reach the Pension Fund in time.

	of returning to work (or within 30 days of their last day of service if they don't return).		
Membership Aggregation: LGPS (Administration) Regulations 2008,	A member who transfers prior to 1st April 2014 from another LGPS employer, either directly or after a break, may opt to aggregate the two periods of membership provided they do so while still an active member in the new post and within twelve months of joining	16(4)(b)(ii)	The Council do not extend the normal time limits, except in exceptional circumstances where it may be reasonable i.e. there is evidence that an election was made but did not reach the Pension Fund in time.

Non- Mandatory - Redundancy Discretions

Local Government (Early Termination of Employment) (Discretionary Compensation) (England and Wales) Regulations 2006 (as amended)

Employer Discretion	Description	Regulation	SNC/BDC Policy
Redundancy Pay on actual weeks' pay	To base redundancy payments on an actual weeks pay where this exceeds the statutory weeks' pay limit.	5	The Council will base redundancy payments on an actual weeks pay where this exceeds the statutory weeks' pay cap
Lump sum compensation	To award lump sum compensation of up to 104 weeks' pay in cases of redundancy, termination of employment on efficiency grounds, or cessation of a joint appointment.	6	For the period 1st January 2020 to 31st December 2021 the Council will multiply the number of weeks in the statutory redundancy table by 1.6.

	From the 1 st January 2022 the multiplication will reduce to 1.4 times the number of weeks in the statutory redundancy table.
	Please refer to the full Redundancy Policy for further details.

These discretions will be reviewed on a regular basis to ensure they remain applicable and appropriate.

CABINET CORE AGENDA 2021

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
19 Jul	Key	Business Case Finance System	Rodney Fincham	Josh Worley	Exempt
	Key	Insurance Contract – Request for Delegation to Award Contract	Rodney Fincham/ Darren Slowther	Josh Worley	
		Pensions Discretion Policy	Emma Hodds/ Serena Bremner	Josh Worley	
		Skills and Training Programme	Mike Pursehouse Lucy Kirkham	Josh Worley	
		Moving Towards a First-Class Customer Service	Shaun Crook/Dan Moore/Charis Brown	John Fuller	
	Key	IT Strategy and Digital Strategy	Chris Balmer	Josh Worley	
	Key	Submission of the Greater Norwich Local Plan to the Secretary of State for Independent Examination	Paul Harris	Lisa Neal	
	Key	Adoption of Conservation Area Boundaries and Conservation Area Appraisals for the conservation areas of Burston, Forncett, Gissing, Thorpe Abbots, Winfarthing and Wramplingham	Chris Bennett	Lisa Neal	
	Key	Procurement Consortium	Rodney Fincham	Josh Worley	Exempt
		Emergency Planning Structures	Nick Howard	John Fuller	
	Key	Long Stratton Neighbourhood Plan	Richard Squires	Lisa Neal	
13 Sept	Key	Capital Funding for SNC Growth Programme	Phil Courtier	Josh Worley	
-	Key	Regulatory Enforcement Policy	Nick Howard	Michael Edney	Exempt
		Future Office Accommodation Project	Debbie Lorimer/ Leigh Booth	Kay Mason Billig	
		Tree Management Policy	Tig Armstrong	Lisa Neal	
	Key	Residual Side Waste Charging Mechanism	Michaela Beaumont	Michael Edney	
		Prevention Advice and Support Model	Mike Pursehouse	Alison Thomas	
18 Oct	Key	Redesign of Care and Repair and Disabled Facilities Grant Service Element of Integrated Housing Adaptations Team	Kevin Philcox/ Leigh Booth	Alison Thomas	
		Alignment of Waste Customer Services	Simon Phelan	Michael Edney	

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt
	Key	South Norfolk Village Clusters Housing Allocations Regulation 19 Publication	Paul Harris	Lisa Neal	
		Charging Policy	Madeleine Bussens	Josh Worley	

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.