

Economy and Environment Policy Committee

Agenda

Members of the Economy and Environment Policy Committee:

Cllr J Knight (Chairman)
Cllr Y Bendle
Cllr F Curson
Cllr K Hurn
Cllr I Spratt

Cllr J Overton (Vice Chairman)
Cllr C Brown
Cllr G Francis
Cllr R Savage

Date & Time:

Friday 2 September 2022
2.00pm

Place:

Council Chamber, South Norfolk House, Cygnet Court, Long Stratton, Norwich, NR15 2XE

Contact:

Jessica Hammond tel (01508) 505298
Email: committee.snc@southnorfolkandbroadland.gov.uk
Website: www.southnorfolkandbroadland.gov.uk

PUBLIC ATTENDANCE:

If a member of the public would like to observe the meeting, or speak on an agenda item, please email your request to committee.snc@southnorfolkandbroadland.gov.uk, no later than 5.00pm on Tuesday 30 August 2022.

Large print version can be made available

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

AGENDA

- 1. To report apologies for absence and to identify substitute members;**
- 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 form and flow chart attached – page 3)
- 4. To confirm the minutes of the meeting of the Economy and Environment Policy Committee held on Friday 22 April 2022;**
(attached – page 5)
- 5. What is being done, in planning terms, and what could be done to mandate the installation of lower carbon and higher sustainability measures into new housing development?;**
(attached – page 10)
- 6. Public Space Protection Order – Dog Fouling;**
(report attached – page 17)
- 7. Annual re-ratification of Strategy for Norfolk Strategic Flood Alliance;**
(report attached – page 26)

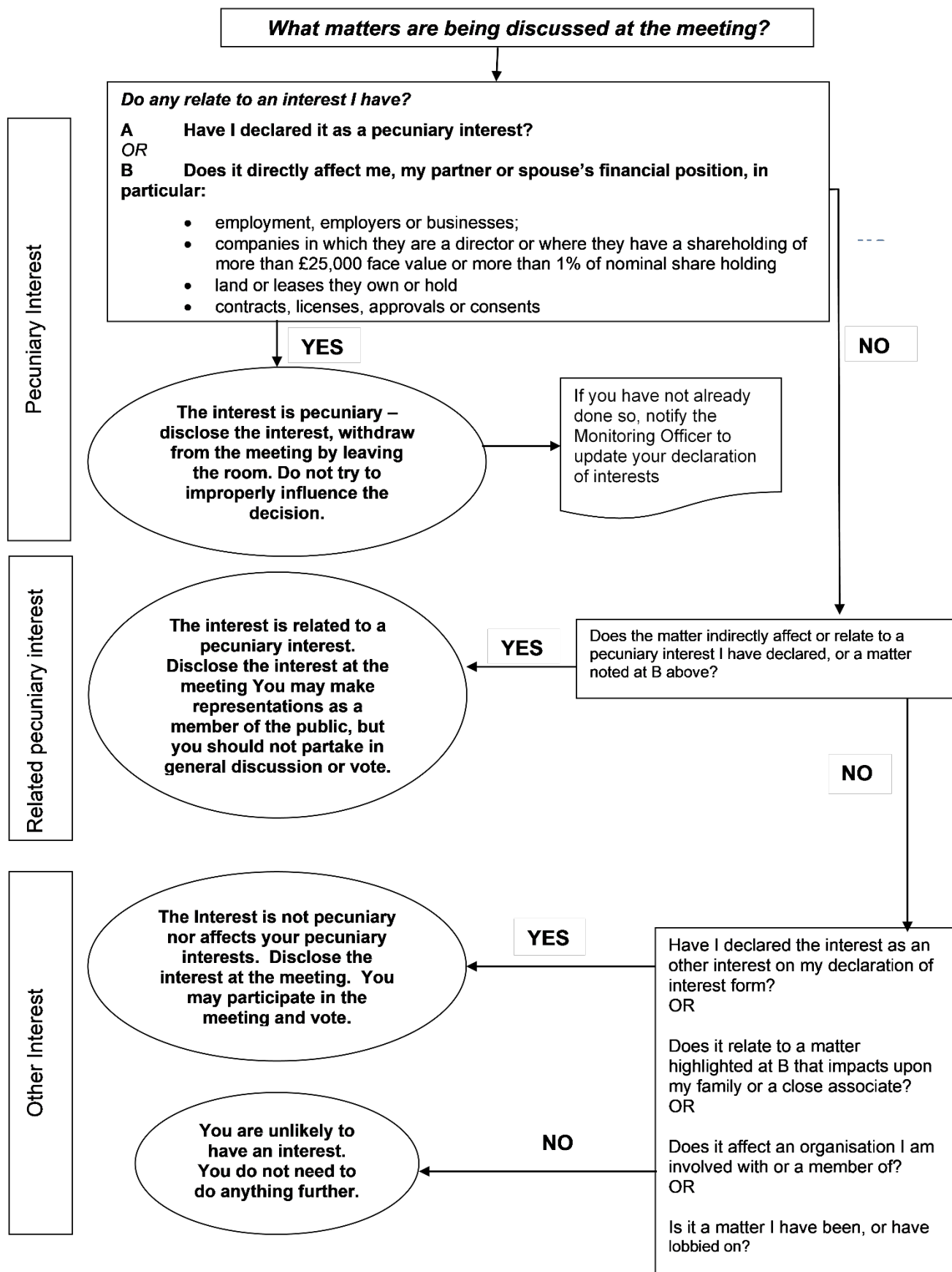
DECLARATIONS OF INTEREST AT MEETINGS

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

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

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

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Agenda Item: 4

ECONOMY AND ENVIRONMENT POLICY COMMITTEE

Minutes of a meeting of the Economy and Environment Policy Committee of South Norfolk District Council, held on Friday 22 April 2022 at 2pm.

Committee Members Present: Councillors: J Knight (Chairman), C Brown, D Elmer, K Hurn and R Savage

Apologies: Councillors: F Curson, G Francis, J Overton and S Nuri-Nixon

Substitute: Councillor: N Legg (for G Francis)

Officers in Attendance: The Assistant Director for Regulatory (N Howard), the Assistant Director of Economic Growth (G Denton), the Economic Growth Programme Manager (D Baillie-Murden), the National Management Trainee (E Howman) and the Democratic Services Officer (J Hammond)

32 APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllr Curson, Cllr Francis (with Cllr Legg substituting), Cllr Overton and Cllr Nuri-Nixon.

33 DECLARATIONS OF INTEREST

No declarations of interest were made.

34 MINUTES

The minutes of the meeting of the Economy and Environment Policy Committee held on 30 March 2022 were agreed as a correct record.

35 ECONOMIC GROWTH STRATEGIC PLAN

The Economic Growth Programme Manager introduced the report, which presented the South Norfolk Economic Growth Strategic Plan 2022-2027 and

summary document and sought the Committee to recommend to Cabinet that it approve and adopt the plan.

Members were advised that the Strategic Plan outlined the activities and projects which would be undertaken by the Economic Growth team to deliver against the priorities in the Council's Delivery Plan.

The Economic Growth Programme Manager explained that the long-term impacts of the pandemic as well as the emerging cost of living crisis had highlighted the need of an Economic Growth Strategic Plan. The proposed plan built upon local vision, whilst identifying the social and economic challenges, economic strengths and opportunities and detailed the actions and commitments needed to support clean, inclusive and productive growth. She further added that this would be achieved by focusing on four main priorities:

1. **Growth and Investment** – supporting businesses and breakout sectors and securing capital funding
2. **Quality Locations and Infrastructure** – quality and affordable housing, building community resilience, improving public transport and improving general infrastructure/connectivity
3. **Skills and Lifelong Learning** – addressing the skills shortage, creating high level employment and tackling long term unemployment while maintaining equality of opportunity and inclusive growth
4. **Enterprise** – encouraging the use of new technologies and developing networks

In delivering the plan, attention would be paid to the opportunities and potential which existed in key clusters selected.

Key clusters included:

- Manufacturing and Engineering
- Visitor Economy and Cultural Sectors
- Agri-food and Life Sciences

Emerging clusters included:

- Finance, Insurance and Professional Services
- Energy and Clean Technology

The Assistant Director of Economic Growth advised the Committee of the UK Shared Prosperity Fund (UKSPF) which formed part of the Government's 'Levelling Up' agenda. He explained that the Council was required to submit a three-year Investment Plan by the end of June 2022 in order to bid for £1.75million in funding. Due to the fast-moving nature of the funding bid, the Assistant Director of Economic Growth proposed four additional recommendations to Cabinet. These additional recommendations proposed the use of the Economic Strategic Plan as a framework for the three-year Investment Plan, as well as delegated authority be given to the Assistant Director of Economic Growth, in consultation with the relevant Portfolio Holder:

1. For the creation, finalisation and submission of a three-year Investment Plan to meet the requirements of the UKSPF
2. To sign the contract and accept the terms of the UKSPF, subject to appropriate legal advice
3. For the allocation and expenditure of funding of the UKSPF, in line with the commitments set out in the Investment Plan and, by exception, lines of expenditure not included in the plan.

One member noted that at its last meeting the Committee recommended to Cabinet the post of a Community Infrastructure Officer, and queried whether this officer had had a role in creating the plan. The Assistant Director of Economic Growth explained that the role had not yet been filled, but once appointed, the officer would be involved in the implementation of the plan.

Discussion turned to the emerging Energy and Clean Technology cluster, and members highlighted the risk of public opposition to inland wind turbines, solar farms and battery storage as well as the feasibility of securing funding against more coastal districts. The Economic Growth Programme Manager explained that there was a large amount of inward investment surrounding clean energy and technology which South Norfolk District should take advantage of. One member believed that the current cost of living crisis and rising fuel and energy costs was likely to have shifted views on the acceptability of inland renewable energy generation in favour of energy security and stability.

One member supported the focus on Agri-food clusters and highlighted the need to support the farming sector, especially in light of recent food shortages and the cessation of EU and Government grants. It was also noted how this cluster could tie-in with Energy and Clean Technology.

A number of members stressed the importance of providing premises for businesses to upscale instead of solely focusing on start-up businesses, as there was already a large provision available for start-ups. Alongside this members highlighted the need to identify and support the growth of social enterprises.

Discussion moved to the key issue of Housing Affordability and the Council's aim of "increasing new and affordable homes for residents". Members felt that the Strategic Plan needed to be clearer in terms of the desired outcome, concern was also raised regarding the risk of further house price increases resulting from the promotion of higher skilled employment in the district.

In response to a query, the Assistant Director of Economic Growth explained that whilst the Council could not directly deliver energy network infrastructure across the district, it could build relationships with local Distribution Network Operators (DNO's) to lobby for better provision and influence the location of infrastructure inline with housing development and the development of new settlements. One member added that DNOs were seeking to engage with

local authorities whilst developing their five-year Business Plans in order to ascertain where to invest in future energy infrastructure.

With regard to the priority of Skills and lifelong Learning, one member felt that the Strategic Plan did not reflect the true scale of the issue, as there was already a severe skills shortage in South Norfolk prior to the Covid-19 pandemic. It was also felt that, whilst important, apprenticeships were not the sole route for removing inequalities which reduced social mobility. In response to a question, the Economic Growth Programme Manager confirmed that officers were liaising with the University of East Anglia to understand current graduate retention levels and how improvements could be made. Members also noted that graduate retention and addressing the skills gap in South Norfolk could only be successful if rural transport links and infrastructure were addressed.

After further discussion, a vote was taken, and it was unanimously

RESOLVED

TO RECOMMEND TO CABINET that it:

1. Approve and adopt the South Norfolk Economic Growth Strategic Plan 2022 – 2027 and use of the Summary as an externally facing document.
2. Agree to the use of the Economic Strategic Plan as a framework for the three-year investment plan required for accessing UK Shared Prosperity Funding (UKSPF).
3. Delegate to the Assistant Director for Economic Growth, in consultation with the Portfolio Holder for Stronger Economy and the Leader of the Council, for the creation, finalisation and submission of a three-year investment plan to meet the requirements of the UKSPF.
4. Delegate to the Assistant Director for Economic Growth, in consultation with the Portfolio Holder for Stronger Economy and the Leader of the Council, to sign the contract and accept the terms of the UKSPF, subject to appropriate legal advice.
5. Delegate to the Assistant Director for Economic Growth, in consultation with the Portfolio Holder for Stronger Economy, the Portfolio Holder for Finances & Resources and the Leader of the Council, for the allocation and expenditure of funding of the UKSPF. In line with the commitments set out in the investment plan and, by exception, lines of expenditure not included in the plan.

(The meeting concluded at 3.14pm)

Chairman

Agenda Item: 5
Economy and Environment Policy Committee
2 September 2022

What is being done, in planning terms, and what could be done to mandate the installation of lower carbon and higher sustainability measures into new housing development?

Report Author(s): Tracy Lincoln
Development Manager
01508 533814
Tracy.lincoln@southnorfolkandbroadland.gov.uk

Portfolio: Stronger Economy

Ward(s) Affected: All

Purpose of the Report:

This report provides members with the planning and building regulation policy background relating to the provision of higher sustainability and efficiency standards on new dwellings including renewable energy together with the intended journey to reach a new Future Homes Standard and be zero carbon ready.

Recommendations:

1. Note the contents of the report and the step change through the First Homes Standard (through the Building Regulations) for carbon and energy efficiency standards for new dwellings.
2. Officers to engage in further Future Homes Standards consultations in 2023 which will add further details to the published intended phased approach by Government to achieve the full aims of the Future Homes Standard

1. Summary

- 1.1. There is wide ranging support in principle through national and local planning policy and Building Regulations for incorporating renewable energy and energy efficiency measures in new developments.
- 1.2. There are, through the Joint Core Strategy (JCS), and continue to be, through the Greater Norwich Local Plan (GNLP), planning policies that require energy efficient design and provision of renewable energy in new dwellings. The GNLP however was drafted acknowledging that the Government's First Homes Standards may well require significantly greater requirements in this respect through Building Regulations.
- 1.3. It is evident that the introduction of First Homes will introduce a step change to future proof new buildings with low-carbon heating systems and high fabric efficiency and this to be secured through the Building Regulations.
- 1.4. First Homes will be in two phases. The first phase sees Building Regulations changes coming into force on 15 June 2022 and provides intermediate uplift to existing energy efficiency standards. Applying the requirements of the intermediate changes to building regulations should produce dwellings with 31% less CO₂ compared to those built to current standards. The new Future Homes Standard when the second phase is developed and in effect by 2025 should ensure that all new homes built from 2025 will produce 75-80% less carbon emissions than homes delivered under current regulations.
- 1.5. Overall, the direction of travel of all policy updates takes us towards more decentralised renewable sources, higher efficiency and greater use of renewable energy but notably the First Homes Standards will be the key tool to realise a significant shift in renewable energy and energy efficient homes.

2. Policy context and planned approach

- 2.1 Two key factors, fabric energy efficiency and renewable energy generation are necessary to achieve homes with lower carbon requirements and therefore higher sustainability.
- 2.2 These two approaches have been used in combination within existing building regulations and planning policy.
- 2.3 A fabric first energy efficiency approach looks to the design and efficiency standards of the building to first deliver more efficient buildings and therefore a reduced energy requirement.
- 2.4 Once the energy efficiency of a dwelling has been improved, meeting the energy demands of the dwelling through the provision of renewable energy (low carbon sources) allows us to bring dwellings to a net zero carbon position.
- 2.5 In respect of a fabric first approach, the building regulations have largely governed the energy efficiency design standards required for this, with planning policy having required schemes to maximise sustainable construction and in some cases

demonstrating greater standards above that of building regulations where the provision of renewable energy 10% requirement hasn't been able to be achieved in full.

- 2.4 In respect of the delivery of low carbon renewable energy for dwellings this has been secured through the Joint Core Strategy with the application of policy JCS3 with its requirement for 10% of the schemes energy to be delivered through decentralised or low carbon sources. This is mostly secured through the provision of solar photovoltaics or air source heat pumps for approved schemes.
- 2.5 Emerging planning policy in the GNLP has set higher standards for energy efficiency and carbon, however with recognition that the planned shift change in the Building Regulations in the form of the Future Homes Standards may go beyond the planning requirements at pace.
- 2.6 The Future Homes Standard has progressed further since the drafting of the GNLP and will now see the largest and most comprehensive changes to the Building Regulation focusing on new build housing and their energy efficiency, ventilation and overheating. This shift change and the requirement imposed for primary energy requirements and energy efficiency achieving an approx. 80% reduction in carbon for new dwellings with the full roll out of the First Homes Standards by 2025 will therefore supersede the planning requirements.
- 2.7 The sections below set out in more detail the current planning policy requirements; the proposed GNLP requirements and the Future Homes Standards (phased approach) where a shift change in sustainability and carbon reduction in new homes will be realised.

3. The Planning Context – Existing Policy

National: The National Planning Policy Framework

- 3.1. Sustainable development is at the heart of the National Planning Policy Framework, running as a theme through the entire document with the presumption in favour of sustainable development. The environment is one of three pillars of sustainable development:

NPPF – Paragraph 8(c:)

“an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”

- 3.2. Section 14 of the NPPF is the key section for delivery of lower carbon and sustainability measures and incorporates measure to both prevent climate change and adapt to the changes already under way. Paragraph 152 sets the scene for this section:

“The planning system should support the transition to a low carbon future in a

changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”

- 3.3. For writing development plans further paragraphs encourage a positive strategy for providing energy from sustainable sources, both through new specific energy projects and through incorporation into other forms of new development.
- 3.4. Support in principle is given to community led renewable energy projects subject to acceptable landscape impact. Support is given to renewable projects outside of local plan allocations subject to being proportionate to the area and acceptable impacts (landscape etc.).

National: Planning Practice and Guidance

- 3.5. The PPG documents are largely silent on the requirements for renewable energy on new homes, instead focusing on stand-alone renewable energy projects of all scales. It is left to the NPPF and local policies to give the details.

Local: The Joint Core Strategy

- 3.6. The Joint Core Strategy incorporates themes derived from the NPPF; but provides more detail relevant at the local level.
- 3.7. Within this document the key driver of existing planning application assessment at a development management level is policy 3 (Energy and Water). This policy requires all developments of 10 or more dwellings (or 1000m2 of Commercial) to provide at least 10% of their energy needs via decentralised and/or low carbon sources. There is also a requirement to explore options for achieving a higher amount. Major applications are also required to demonstrate that all viable and practicable steps have been taken to maximise opportunities for sustainable construction.
- 3.8. Policy 3 provides the justification for planning conditions to be include on permissions whereby the specific schemes for the 10% (or greater) are then agreed via discharging the condition in most cases.
- 3.9. Within this requirement, the exact mix by which the 10% is made up is not specified so can vary on a development-by-development basis but can include both renewable electricity generation (often in the form of solar panels) or renewable heating provision (increasingly in the form of air source heat pumps).
- 3.10. Anecdotally, some developments are exceeding this amount, especially where air source heat pumps are used on all dwellings or customer demand increases the solar panel provision, however others continue to only demonstrate the minimum 10% required.

Local: The South Norfolk Local Plan – Development Management Policies

- 3.11. Again, the SNLP incorporates themes derived from the NPPF; although it does not include a specific requirement on par with that outlined in the JCS.
- 3.12. As a result, there is no planning policy requirement for renewable energy on developments of less than 10 dwellings at present.
- 3.13. It is noted there is also no renewable energy requirements (through planning policy) on householder extensions, replacement dwellings or annexes.

Local – Neighbourhood Plans

- 3.14. There is an emphasis on local community led projects within the NPPF. PPG guidance offers the neighbourhood planning process as a method of securing renewable schemes. However, most (if not all) neighbourhood plans at present do not set renewable energy targets for new development.

4. The Planning opportunities – Emerging Planning Policy

The Greater Norwich Local Plan

- 4.1. The Greater Norwich Local Plan is being developed at present and will supersede the JCS when it is adopted.
- 4.2. The proposed policy to replace the 10% requirement is more general approach that supports decarbonised energy supplies locally by promoting measures such as decentralised, renewable and low carbon energy generation, co-locating potential heat customer and suppliers, and battery storage, as well as energy efficiency in new developments using the following text:
- 4.3 *“Minimise energy demand through the design and orientation of development and maximise the use of sustainable energy, local energy networks and battery storage to assist growth delivery. This will include:*
 - *All new development will provide a 19% reduction against Part L of the 2013 Building Regulations (amended 2016);*
 - *Appropriate non-housing development of 500 square metres or above will meet the BREEAM “Very Good” energy efficiency standard, or any equivalent successor;*

except where a lower provision is justified because the requirement would make the development unviable.”

- 4.4 The policy also requires larger developments (100 dwellings plus or 10,000 square metres plus for non-residential development) to maximise opportunities for the use of sustainable local energy networks.
- 4.5 The defined standards were intended not to be prescriptive. They allow for either a “fabric first” approach to reducing energy use, which on many types of site tends to be cheaper, or the use of on-site sustainable energy, or a mixture of both. It was anticipated that should further detail on how energy efficiency could be

achieved to meet the aims of the policy an SPD could be formulated, however it is now evident that the requirements from the current Building Regulations changes (2022) and further standards required to complete the full First Homes Standards may largely render this unnecessary.

New Neighbourhood Plans

- 4.6 While neighbourhood plans are created at the parish level, support is provided by the SNC policy team and assistance could be given with regard to incorporating greater renewable energy requirements when new plans are being written.

National Policy Changes

- 4.7 National Planning Policy changes are currently in progress with the Levelling up Bill, although the impact on renewable energy delivery for new homes is currently unclear. At this stage, it does not appear likely there will be significant changes to national policy in this regard based on the available summaries.

5. Building Regulations

- 5.1. Building regulations provide the requirements for insulation and energy efficiency (amongst other safety requirements) and as a result, this stage is often stricter than planning policy.
- 5.2. The requirements set out energy usage limits and therefore offer two methods with which to achieve this: energy efficiency and provision of micro-generation renewable energy. The method chosen is largely up to the developer so at present, it is often done through greater insulation and energy efficiency measures as they are seen as the cheaper option. At present therefore, the largest driver in on site renewable energy provision most cases is the JCS 10% requirement previously highlighted.
- 5.3. A new Future Homes Standard is being introduced that will see the largest and most comprehensive changes to the Building Regulation focusing on new build housing and their energy efficiency, ventilation and overheating. To view the Future Homes Consultation: <https://www.gov.uk/government/consultations/the-future-buildings-standard>
- 5.4. The First Homes Standard will when fully implemented by 2025 future proof new buildings with low-carbon heating systems and high fabric efficiency standards see:
- 75% - 80% lower Co2 emissions for new homes built from 2025
 - Grid decarbonisation – zero carbon ready standard – no further retrofit required (no gas will be allowed in new homes from 2025) and key will be use of heat pumps in the home
 - Very high fabric standards
- 5.5 The First Homes Standard is being introduced in phases with the first phase amending the Building Regulations coming into force on 15 June 2022 which provides intermediate uplift to existing energy efficiency standards. Applying the requirements of the intermediate changes to building regulations now in effect

would mean new homes meeting the new standards should produce 31% less CO₂ compared to those built to current standards.

- 5.6 The new Future Homes Standard should ensure that all new homes built from 2025 will produce 75-80% less carbon emissions than homes delivered under current regulations.

6 Conclusion

- 6.1 There is already a shift change coming into effect to achieve lower carbon homes without any further planning policy intervention.
- 6.2 In terms of achieving lower carbon homes the proposed GNLP sought a reduction against Part L of the current building regulations by 19% (which can be achieved by energy efficiency, design and renewable energy). It was however anticipated in drafting the GNLP that the First Homes Standards (a shift in the Building Regulations) would go beyond this.
- 6.3 The First Homes Standards being implemented in two phases by the Government sees a step change to future proof new buildings with low-carbon heating systems and high fabric efficiency and this to be secured through the Building Regulations.
- 6.4 The first phase of the Future Homes Standard effective June 2022 will already introduce changes to the Building Regulations to see a 30% reduction in carbon in new dwellings. The second phase, on which the detail will be consulted in 2023, will see the introduction of measures to realise approx. 75-80% less carbon emissions than homes delivered under current regulations.
- 6.5 No further planning policy changes are necessary due the significant shift in Government Policy and onus through the Building Regulations mandatorily bring about these changes.

7 Recommendations

1. Note the contents of the report and the step change through the First Homes Standard (through the Building Regulations) for carbon and energy efficiency standards for new dwellings.
2. Officers to engage in further Future Homes Standards consultations in 2023 which will add further details to the published intended phased approach by Government to achieve the full aims of the Future Homes Standard

Background Papers

None

Public Space Protection Order - Dog fouling

Report Author(s):

Teri Munro
Community Safety Officer
teri.munro@southnorfolkandbroadland.gov.uk

Andrew Grimley
Environmental Protection Manager
andrew.grimley@southnorfolkandbroadland.gov.uk

Portfolio:

Clean and Safe Environment

Ward(s) Affected:

All Wards

Purpose of the Report:

This report presents for Cabinet approval a proposed new dog fouling and dog restrictions Public Space Protection Order under the Anti-social Behaviour, Crime & Policing Act 2014. This follows public consultation and would establish replacement of the existing Public Space Protection Order on a like-for-like basis

Recommendations:

1. That Economy and Environment Policy Committee recommends that Cabinet approves the Public Space Protection Order No. 3 as proposed in paragraph 4.7 and Appendix 1 over the geographical areas identified in Appendix 2 for a period of three years.

1 SUMMARY

- 1.1 A Public Space Protection Order is the mechanism by which the Council can incentivise people to clean up after their dogs if they have fouled in a public place or have allowed their dogs to enter an enclosed play area without reasonable excuse and can enforce non-compliance. Public Space Protection Orders have a maximum duration of three years, and a decision is now required whether to approve a new one, either as proposed or differently worded.
- 1.2 Dog fouling remains a significant environmental concern and nuisance for residents. This report presents recommendations for Cabinet approval to make a new Public Space Protection Order No.3 under the Anti-social Behaviour, Crime & Policing Act 2014 to apply to the whole South Norfolk Council administrative area. This legal control would require persons in control of dogs firstly to clear up after them if they foul in on any public/private land open to the air which the public have access with or without payment including but not limited to all public highways (to include verges, footways, and footpaths), all public parks, pleasure grounds, sports grounds, playing fields and play areas and secondly to exclude dogs from enclosed children's play areas.

2 BACKGROUND

- 2.1 A Public Space Protection Order (PSPO) is the principal measure available to councils to combat dog fouling offending by irresponsible dog owners. Such orders are made routinely by councils across the country.
- 2.2 The previous Public Space Protection Order was extended in 2021 applying to the whole administrative area of South Norfolk and Required a person in control of a dog to clean up after it when it fouls in a public place; and excluded dogs from enclosed children's play areas (i.e., those enclosed by a fence) in South Norfolk that are open to the air, however they have a limited duration.
- 2.3 The Order made exemptions for people who are blind, deaf or have a disability that affects their mobility, manual dexterity, physical coordination, or ability to lift, carry or otherwise move everyday objects, in respect of a dog trained by a registered charity and upon which they rely for assistance.
- 2.4 Before making a public space protection order the Council must be satisfied that the activity has a detrimental effect on the quality of life of those in the locality (or it is likely that activities will take place and have such an effect); is (or is likely to be) persistent or continuing in nature; is (or is likely to be) unreasonable and justifies the restrictions being imposed. The Council must formally consult with the local police and local communities on the proposal to introduce an order.

3 CURRENT POSITION/FINDINGS

- 3.1 The South Norfolk district enjoys relatively low levels of reports of dog fouling however routine contact with residents tells us that dog fouling remains an issue the public are concerned about.
- 3.2 Dog fouling is unpleasant where it occurs and contact on rare occasions with dog excrement can cause toxocariasis – an infection that can lead to dizziness, nausea, asthma and even blindness or seizures.
- 3.3 While most dog owners are caring, responsible individuals, there are still some people who do not clean up after their pets.
- 3.4 Over the previous twelve months the Council has responded to 70 complaints of dog fouling. In this period no fixed penalty notices were issued because offenders could not be identified. However, action was taken to inspect the local areas of concern and reassure local communities as to the council's robust enforcement policy. When an offender is dealt with, a fixed penalty notice may be offered or the council may decide to prosecute. Formal action tends to have the support of the majority of residents.
- 3.5 It should be noted that despite the low rate of fixed penalty notice service, public space protection order signage and bins act as a reminder to dog owners of the penalties of not complying with the order.
- 3.6 A public space protection order allows the council to post anti-fouling signage, place dog waste bins in public areas, to issue fixed penalty notices or prosecute dog owners who fail to clear up after their pets. The same legal actions can be taken for owners who allow their animals into enclosed children's play areas.

4 PROPOSED ACTION

- 4.1 A public space protection order can run for a period of up to three years. The Public Spaces Protection Order No.3 has been drafted as presented in Appendix 1 is made, with a duration for a period of three years. The requirement for a further such Order will be then considered in good time to with a view to future decisions provided for under the Anti-social Behaviour, Crime & Policing Act 2014.
- 4.2 Prior to the production of this report a formal consultation ran from 6th May 2022 until 17th June 2022. Parish and Town Councils were consulted with letters sent via emails. The Police, Police & Crime Commissioner and Norfolk Highways were consulted via posted letter and the public consultation was carried out via the Councils website.
- 4.3 No objections were raised against the proposed Public Space Protection Order from any consultee or member of the public via the Council's website.
- 4.4 Whilst not offering an objection to the proposed public space protection order, Costessey Town Council did respond (a) noting an absence of dog fouling formal enforcement, (b) a view that notices, signs and public space protection order s are

widely ignored by members of the public so enforcement is essential, and (c) that South Norfolk Council did not have enough Enforcement Officers to make this public space protection order effective.

- 4.5 Also, whilst not offering any objection, Hingham Town Council formally requested that, the council follow the example of other councils and include in the public space protection order an addition making it an offence not to have sufficient means to clean up after their dog. This proposal was received after the consultation had closed and the Council would need to reconsult on this suggestion. The existing offence under the Council's recent public space protection order is not to clear up after your dog, and officers enforcing the order do not accept the failure to carry a device or other suitable means of removing the faeces as an acceptable reason for failing to remove the faeces. The Council can review the need and proportionality for the suggested (or any other) additional offences in future review of the public space protection order.
- 4.6 No responses were received from the Police Crime & Commissioner, Norfolk Constabulary or Norfolk Highways.
- 4.7 Following the closure of the consultation period, and having considered the responses received, it is proposed that the Public Space Protection Order No.3 is made as set out in Appendix 1.
- 4.8 With the introduction of a new public space protection order, Council officers will conduct patrols in areas where reports or intelligence are received that fouling is occurring. Officers will endeavour to inform and where necessary educate dog owners and will robustly investigate when individuals are identified as not clearing up after their dogs. Regulatory officers will work with the Council's waste and cleansing services to monitor and target more frequently dog fouled areas, with a view to reducing the amount of clean-up of public areas that is required.

5 OTHER OPTIONS

- 5.1 The Council could decide to not to approve a new public space protection order. This would leave the council with limited sanctions or deterrents to deal with irresponsible dog owners who fail to clear up after their pets. This option is not recommended due to the scale of public concern about dog fouling, the importance of cleanliness of the open spaces of South Norfolk, and the fact that dog fouling left in such areas can present health issues to residents.

6 ISSUES AND RISKS

- 6.1 **Resource Implications** – Signage is already in place and monitoring/enforcement is business as usual for the Community Protection Team.
- 6.2 **Legal Implications** – The legislation establishes a particular process for adoption of a Public Space Protection Order. The Public Spaces Protection Order No.3 as proposed is a readily administered legal sanction available to local authorities to tackle irresponsible dog owners with a straightforward enforcement process.

- 6.3 **Equality Implications** – No equality implications have been identified. The order would have exemptions for people reliant on assistance dogs.
- 6.4 **Environmental Impact** – The proposed public space protection order would have a positive environmental impact by establishing clear regulatory offences and penalties, encouraging dog owners keep our open spaces clean and increase compliance, and contributing to cleaner neighbourhoods and environments.
- 6.5 **Crime and Disorder** – The proposed public space protection order will encourage responsible dog owners by providing an easily administered enforcement sanction for use in dealing with dog fouling and irresponsible dog owners.
- 6.6 **Risks** – Public space protection orders are made under the Anti-social Behaviour, Crime & Policing Act 2014. Direct offences under the orders are difficult to witness however dog fouling is an area where there is near universal agreement that public spaces and children's play areas should be kept clear of dog fouling. Having the orders in place allow the council to advertise the requirement and penalties of a dog owner not clearing up after their animals and to legitimately raise the profile of the authority in the area by regular high visibility patrolling.

7 CONCLUSION

- 7.1 The adoption of the Public Space Protection Order No.3 as proposed will deter dog fouling offences by irresponsible dog owners and enable enforcement under specific legal requirements. This will protect the health and wellbeing of our residents and the quality and cleanliness of South Norfolk's open spaces.

8 RECOMMENDATIONS

- 8.1 That Economy and Environment Policy Committee recommends that Cabinet approves the Public Space Protection Order No. 3 as proposed in paragraph 4.7 and Appendix 1 over the geographical areas identified in Appendix 2 for a period of three years.

Background Papers

None

Appendices

Appendix One – Proposed South Norfolk District Council Public Space Protection Order No. 3.

Appendix Two – Area Map to which the Proposed South Norfolk District Council Public Space Protection Order No. 3 would apply.

South Norfolk District Council 2022

The Anti-Social Behaviour, Crime and Policing Act 2014

Fouling of Land by Dogs

The District of South Norfolk Public Spaces Protection Order No. 3

1. South Norfolk District Council (the Council) hereby makes the following Order:

- a. This Order is made by the Council in exercise of its powers under Section 59 and Chapter 2 of Part 4 of the Anti-Social Behaviour, Crime and Policing Act 2014 (“the Act”) and this Order may be cited at the South Norfolk District Council Public Space Protection Order No.3.
- b. The Council is satisfied that:
 - i. activities carried on within the restricted area as defined in Article 2 below, being the fouling of land by dogs and/or the presence of dogs in enclosed play areas have had or are likely to have a detrimental effect on the quality of life of those in the area
 - ii. such activities may be of a persistent or continuing nature and the restrictions imposed by this notice are justified.

2. The Restricted Areas

- a. This Order relates to all land within the administrative area of the Council, shown in red on the plan in Schedule 1 of this Order, (the Restricted Area). This Order relates to all public/private land open to the air to which the public have access with or without payment including but not limited to all public highways (to include verges, footways, and footpaths), all public parks, pleasure grounds, sports grounds, playing fields and play areas.

3. Requirements and prohibitions

- a. Fouling – failure to remove dog faeces

If a dog defecates at any time on land within the restricted area the person who is in control of the dog at that time shall remove the dog’s faeces from the land forthwith. This restriction is subject to the exemptions as stated in Article 4.

- b. Exclusion – Dog Ban

A person in charge of a dog shall not at any time take the dog into, or permit the dog to enter or remain within, any enclosed play area within the

restricted area. This restriction is subject to the exemptions as stated in Article 4.

4. Exemptions

- a. The restrictions and prohibitions defined in Article 3 of this Order shall not apply to a person who:
 - i. is registered as a blind person in a register compiled under Section 29 of the National Assistance Act 1948
 - ii. is deaf, in respect of a dog trained for death people and upon which he or she relies for assistance
 - iii. has a disability that affects their mobility, manual dexterity, physical coordination, or ability to lift, carry or otherwise move everyday objects, in respect of a dog trained by a registered charity and upon which they rely for assistance.

5. For the purposes of this Order

- a. A person who habitually has a dog in their possession shall be considered in charge of the dog at any time unless at that time another person is in charge of the dog.
- b. Placing dog faeces in a suitable waste disposal receptacle shall be considered sufficient removal to satisfy the requirement of Article 3.
- c. The Council does not consider being unaware of dog defecation (whether by reason of not being in the vicinity or otherwise), or not having a device for or other suitable means of removing the faeces as an acceptable reason for failing to remove the faeces as require by Article 3.

6. Offences

- a. Under section 67 of the Act, it is an offence for a person, without reasonable excuse, to do anything that the person is prohibited from doing by a public space protection order or to fail to comply with a requirement to which the person is subject under a public space protection order.
- b. A person failing to comply with a requirement or prohibition set out in Articles 3(a) or 3(b) of this Order shall be guilty of an offence unless he or she has reasonable excuse for failing to do so.
- c. A person guilty of an offence is liable on summary conviction to a fine not exceeding Level 3 on the standard scale.
- d. Pursuant to section 68 of the Act, a Constable or authorised person of the Council, may issue a fixed penalty notice to anyone he or she has reason

to believe has committed the offences specified above. This gives the person to whom it is issued the opportunity of discharging any liability to conviction for the offence by payment of a fixed penalty to the Council.

- e. The level of the fixed penalty shall be £100. If the fixed penalty is paid within 10 days following the date of the notice the amount payable is reduced to £80.
- f. A person who pays the fixed penalty within the period of 14 days following the date of the notice may not be convicted of the offence in respect of which the fixed penalty notice was issued.

7. Commencement and duration of the Order

- a. This Order comes into force on XXXXXXX and shall remain in force until the XXXXX unless extended under section 60 of the Act.

8. Right to Appeal

- a. Any interested person wishing to challenge the validity of this Order must do so within 6 weeks beginning with the date on which this Order is made or, if applicable, varied.
- b. An application under Section 66 of the Anti-Social Behaviour, Crime and Policing Act 2014 is to the High Court.
- c. An interested person means an individual who lives in the restricted area or who works in or visits that area

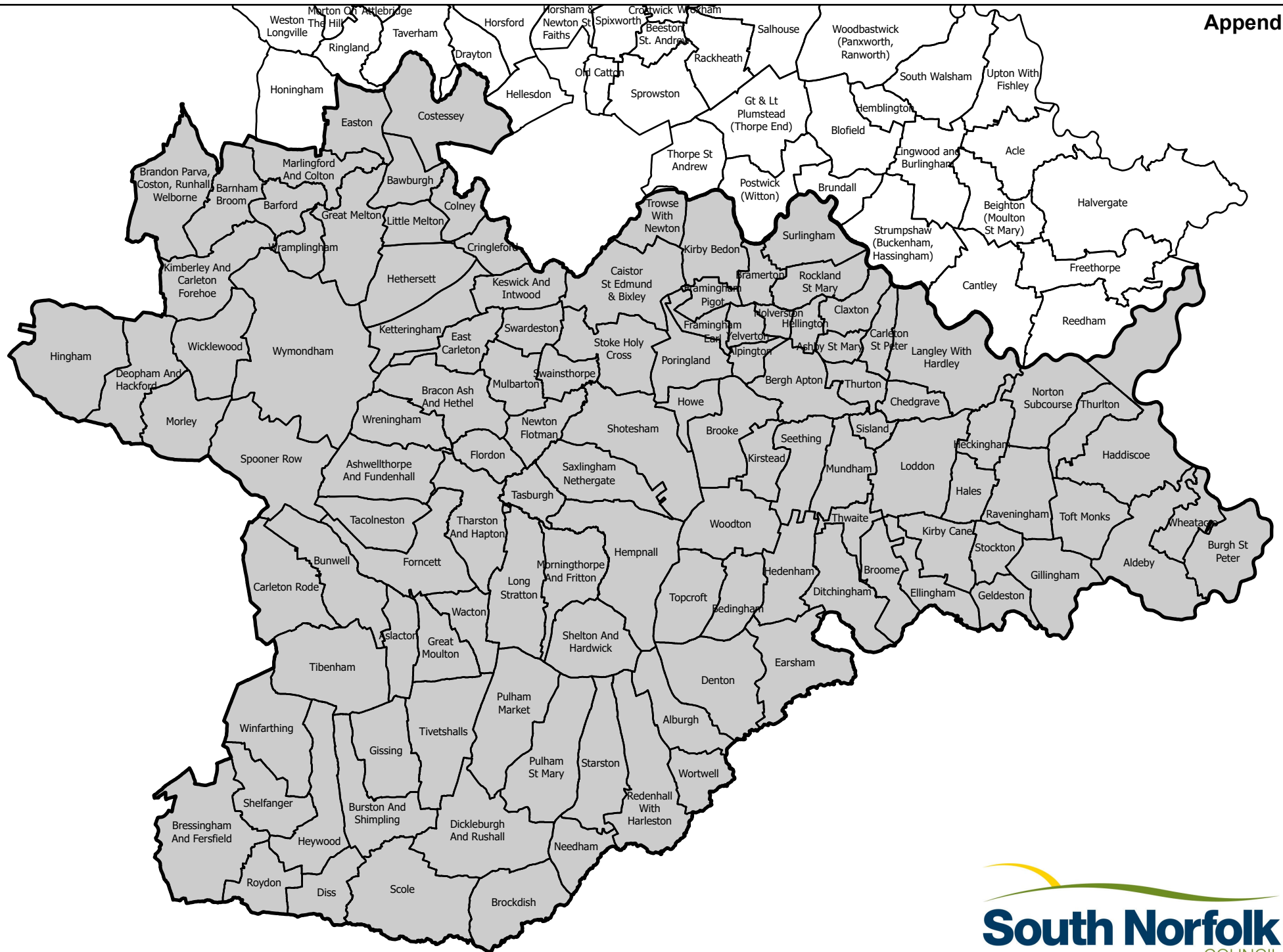
Dated

The Common Seal of South Norfolk District Council

Was hereunto affixed in the presence of

Deputy Monitoring Officer

Officer of the Relevant Service



Annual re-ratification of Strategy for Norfolk Strategic Flood Alliance

Report Author(s): Nick Howard
Assistant Director Regulatory
01508 533787
nick.howard@southnorfolkandbroadland.gov.uk

Portfolio: Clean and Safer Environment

Ward(s) Affected: All wards

Purpose of the Report:

This report presents the slightly updated Norfolk Strategic Flood Alliance's Strategy for annual re-ratification, one year on from its original ratification by Cabinet. Information is provided to outline how the council and the wider Alliance is delivering against the Strategy, and against the wider needs of our communities facing potential threats of flooding.

Recommendations:

1. Economy & Environment Policy Committee to recommend to Cabinet to ratify the Norfolk Strategic Flood Alliance Strategy 2022 as set out at Appendix 1, and to note the progress being made.

1. Summary

- 1.1 The Norfolk Strategic Flood Alliance's (NSFA) Strategy, ratified by Cabinet on 13th September 2021, requires annual re-ratification. This helps to keep high-level action to tackle flooding high on the agenda. Re-ratifying the NSFA Strategy for a further one-year period will endorse and support the approach being taken.
- 1.2 Progress is being made by the NSFA on a range of flooding actions within South Norfolk and across Norfolk.
- 1.3 Local action outlined at paragraphs 3.3 and 3.4 is being taken across the district in collaboration with Broadland District Council through two posts dedicated to working with local communities in flooding awareness, prevention, mitigation, preparedness.

2. Background

- 2.1 The flooding experienced across Norfolk over Christmas and New Year 2020 caused widespread impacts. Responding agencies resources were severely stretched and there were inconsistencies in the responses in different local authority areas. Residents were confused about which agency to contact for help and what level of response they could expect.
- 2.2 Following that flooding, the Norfolk Strategic Flood Alliance (NSFA) was established in early 2021. Chaired by Lord Dannatt, the work of the Alliance has involved strategic lead officers and Leaders from a range of agencies involved in flood response and water management across the County. The NSFA membership includes, among others, the Environment Agency, Anglian Water, the Association of Drainage Authorities, the Water Management Alliance, Water Resources East, the Norfolk Resilience Forum, the Broads Authority and Norfolk's local authorities. The NSFA Strategy was considered and ratified by Cabinet on 13th September 2021. This Strategy will be presented annually for re-ratification to maintain a high profile. This re-ratification is perhaps unusual, but it is appropriate given the challenges that flooding can threaten to some of our communities, and the complexity of making improvements in flooding problem-solving and improving future prevention and mitigation.
- 2.3 There are longstanding flooding issues where ownership of and responsibilities for land, ditches and drains has been unclear. The NSFA is able to highlight these areas and drive these issues forward at a more visible level than previously. The NSFA identified lists of priority flooding sites of concern for special attention, known as Tranche 1 and Tranche 2.

3. Current position/findings

- 3.1 The NSFA has brought various agencies and interests together successfully. It originally produced a set of guiding principles, the NSFA Strategy, and Tranche 1 and 2 lists including a number of locations for focussed attention in South Norfolk. Progress has been made in a number of locations towards the aim of developing costed, funded solutions to ongoing or periodic flooding. The NSFA was also

instrumental in the establishment of Coastal Flooding and Inland Flooding tactical coordinating groups which have monitored and supported the progress of developing solutions to flooding at Tranche 1 and 2 sites. Much of the progress made would have been difficult to achieve without the focus on the NSFA and its Strategy.

- 3.2 The NSFA Board meeting in July 2022 received an annual report for the previous period of one year, an updated campaign plan and a slightly updated version of the Strategy for re-ratification in 2022.
- 3.3 The collaboration with Broadland District Council has enhanced staffing resources to focus on flooding, (1) through a lead operational role undertaken by Flood and Water Management Officer building on a former more junior officer post, and (2) by recruiting a new practical Environmental Management Surface Water Officer post that will, working with communities, promote and enforce where necessary the free-flowing condition of land drains to prevent or minimise localised surface water flooding.
- 3.4 Through these dedicated staffing resources, the aims are to:
 - 1. Bring strong expertise and organisational knowledge to a 'can-do' focus on flooding, closely engaging with key stakeholders and local communities.
 - 2. Offer sector-leading proactive service for flood prevention, mitigation, advice and support.
 - 3. Develop a strong action-focused profile and providing strong reassurance, planning and responses, developing a track record of results.

Key planned activities for Regulatory services and the Flood and Water Management Officer will include:

- a) Identifying and mapping flood risk threatened areas and past incidents, including surface water flooding.
- b) Prioritising higher risk flood-threatened local areas within the district for close attention, engaging with local communities and representatives.
- c) Delivering high quality planning consultation responses to maximise positive influence on flood prevention, mitigation, protection and resolution of significant issues and concerns. Doing this internally on non-major proposed new developments and working with the Lead Local Flood Authority to maximise bespoke consultation on major proposed developments.
- d) Develop and deliver flood prevention and preparedness education and advice as a phased programme of activity to equip local people and ensure responsibilities are understood and exercised.
- e) Pursuing a prioritised work programme to promote, inspect compliance with and enforce where necessary the responsibilities of riparian owners, prioritising for close attention and working through the areas of greatest risk. This will involve practical inspection and community work by a practical inspector gathering information to enable informal and formal enforcement.

- f) Enabling better local community outcomes through flooding and water management policy and funding, strategic and partnering focus, strong positive relationships with stakeholders and key partner agencies.
- g) Promoting local community resilience (flood action groups, community emergency plans, etc.).

4. Proposed action

- 4.1 As reported previously, the NSFA has proposed that, on an annual basis, member agencies are invited to reaffirm their commitment to working in the Alliance and the delivery of collaborative working in accordance with its guiding principles. As an NSFA member the Council, by ratifying each year and then adopting the Strategy into its strategic plans, helps to add weight and brings greater unity of purpose as well as coherency and consistency to bear on flooding action.
- 4.2 The NSFA Strategy has received minor updates for 2022 and is presented at Appendix 1 for ratification for a period of one year.

5. Other options

- 5.1 Cabinet could decide not to re-ratify the NSFA Strategy for a further one-year period.

6. Issues and risks

- 6.1 **Resource Implications** – The NSFA Strategy seeks to gain a consensus approach bringing new focus to member agencies' existing resources. Re-ratification of the Strategy as proposed raises no new resource implications.
- 6.2 **Legal Implications** – None.
- 6.3 **Equality Implications** – No equality implications have been identified in connection with the adoption of the NSFA Strategy.
- 6.4 **Environmental Impact** – Localised flooding has evidently become more frequent in the United Kingdom and this is expected to continue and, potentially, to worsen. The NSFA Strategy (in conjunction with other agency plans, procedures and mitigations) will assist Norfolk residents to become more resilient to flooding. If any major schemes are brought forward the Council will have a key role in environmental assessment of individual projects and schemes as necessary.
- 6.5 **Crime and Disorder** – There are no identified crime and disorder risks associated with this report.
- 6.6 **Risks** – None identified other than set out above.

7. Conclusion

- 7.1 There are strong benefits in taking a multi-agency approach through the NSFA and keeping flooding action high on the local, regional and national agenda. Re-ratifying the NSFA Strategy will for a further year endorse and support the approach being taken.

8. Recommendations

- 8.1 Economy & Environment Policy Committee to recommend to Cabinet to ratify the Norfolk Strategic Flood Alliance Strategy 2022 as set out at Appendix 1, and to note the progress being made.

Background papers

Minutes of Cabinet meeting on 14th September 2021.

NORFOLK STRATEGIC FLOODING ALLIANCE – OVERALL STRATEGY (2022)

The purpose of the constituent members of the Norfolk Strategic Flooding Alliance (NSFA) is to work together so that Norfolk communities and infrastructure are safer and more resilient to the risks of inland and coastal flooding and better placed to ensure adequate water supplies during droughts.

1. **Introduction.** The NSFA was formed following recognition that the county-wide response to flooding and flood-related risks is incoherent and improvements are required to protect and reassure Norfolk communities. Members of the NSFA are united in their determination to work collaboratively and transparently across boundaries and structures to improve the response to flooding and increase the coherency and consistency of flood risk management. The unique selling point of the NSFA is that it represents a single point of focus and collaboration for all flood-related challenges facing the County of Norfolk. As the NSFA enters its second year it has been agreed that the strategy should be updated to reflect the experiences of the last year. We also have a campaign plan that prioritises and sequences our actions and objectives.

OUR GOALS

2. **Our Vision.** The NSFA will be successful through the coordinated actions of the statutory authorities from central to local government, through to commercial companies, land and property owners large and small, their communities and individuals themselves. As a result, the people of Norfolk will have a high level of confidence that flood risks are as low as reasonably practicable and are being managed within the overall context of improved water management.

3. **Our Objectives.** Our objectives are:¹

- a. Maintain a transparent, collaborative, integrated and sustainable approach to water management issues across the County of Norfolk that is applied coherently.²
- b. Provide a cooperative approach to local, regional and national funding opportunities to mitigate Norfolk's flood risks.
- c. Examine how to implement whole river management best practice for inland waterways from catchment areas to the sea.
- d. Work to ensure that the planning system across the County is coherently applied and does not exacerbate the flood risks to new and existing residents and communities.
- e. Work with category one responders and other relevant bodies, so that when they are preparing and delivering their statutory or lead-agency responsibilities they will, where appropriate, collaborate through the Norfolk Resilience Forum (NRF) to:
 - I. enable the Local Lead Flood Authority (LLFA) to compile a common flood risk picture,
 - II. Maintain a consolidated action plan that maps multi-agency activities and progress,
 - III. ensure local flood resilience and the response to flooding events, are streamlined and cohered across the County,
 - IV. achieve synchronised initiatives across Norfolk that mitigate the risk of flooding and enhance communities' local resilience, and

¹ These are distilled further into a series of actions and tasks in Annex A.

² This will include an understanding of other water management strategies and activities already in practice through other bodies and organisations.

- V. deliver a programme of exercises to confirm NSFA effectiveness and assure progress development.³
 - VI. instil an approach that increases the effectiveness of a plan-mitigate-respond-recover continuum.
- f. Enhance the confidence of Norfolk communities through regular public communications and engagement on flood risks, mitigation measures and resilience / self-reliance initiatives.
- g. Complete an Integrated Norfolk Water Management Strategy.⁴
- h. Deliver a united Norfolk view on flooding and water management issues to Central Government.
- i. The function of the NSFA becomes a business as usual (Bau) function where the strategic direction, oversight and leadership is provided by an elected leader and the LLFA.

OUR APPROACH

4. **Our Principles.** Our guiding principles are:

- a. We will work together in a collaborative and transparent manner through the statutory duties established by the Civil Contingencies Act (CCA) (2004) and its supporting doctrine and guidance as well as making maximum use of Public Sector Cooperation Agreements, where appropriate.
- b. Extant statutory or lead responsibilities remain with the relevant agency.
- c. We will share information and manage knowledge intelligently.
- d. We will focus on delivering the best outcome for Norfolk communities.
- e. We will speak with one voice and communicate clearly, coherently and consistently to Norfolk communities.
- f. We will exploit pre-existing structures and multi-agency fora to reduce duplication and ensure our activities are efficient and effective.
- g. We will ensure a balanced approach – delivering quick wins and set the conditions for achieving longer-term success.
- h. We will make evidence-based decisions and anticipate future risk through collaborative analysis and data sharing.
- i. We learn from others and our own experiences and seek to identify and share ‘best practice’ as appropriate.

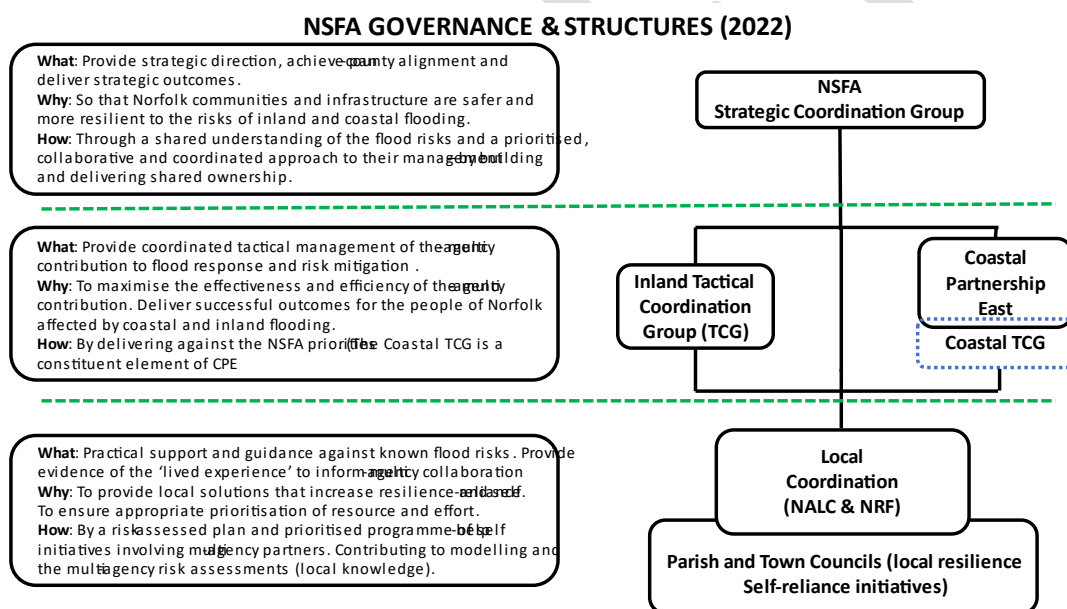
5. **Strategic Collaboration – Threats and Opportunities.** It is unlikely that any single entity will be able to develop projects or solutions alone that mitigate the threats of flooding or to promote the opportunities for better water management. Collaboration (not duplication) between NSFA and Water Resources East (WRE) is essential to a coherent approach across the County of Norfolk. From a water management perspective, WRE and its strategic partners will identify opportunities in the short, medium and long-term to connect fluvial flood risk reduction with water scarcity

³ We will do this in partnership with the Ministry of Housing, Communities and Local Government (MHCLG) or the Cabinet Office, partner authorities in the region and the Emergency Planning College, in the design, training, work up and delivery of the exercise.

⁴ To include an integrated approach to resource planning that considers all potential requests for funding to develop a single and prioritised statement of desired outcomes that all can work to deliver.

opportunities, ideally delivering water quality benefits at the same time. This will predominantly focus on the opportunities to capture and store flood water and make it available for use for example for irrigation, energy production and to drive environmental improvement and natural capital net gain. Key partners in this work, alongside Norfolk local authority colleagues and WRE's Norfolk Water Strategy partners (Anglian Water and The Nature Conservancy) will be landowners, internal drainage boards, local community leaders and environmental Non-Governmental Organisations (NGO).

6. **How we Function.** The NSFA operates across 3 levels (using Civil Contingencies Act doctrinal definitions for each level) – Strategic, Tactical and Operational/Delivery – a schematic representation of how this will be achieved, with broad roles and responsibilities, is shown below:⁵ The NSFA recognises that member organisations and authorities have different priorities, funding arrangements, regulators and statutory obligations. It is incumbent on NSFA members to highlight to the NSFA their constraints to help the NSFA appreciate how best to work around these for the benefit of local communities. While the NSFA will determine its priorities, it accepts the need to use the statutory and funding frameworks of other bodies to realise these priorities. The Norfolk County Council (NCC) communications team would use this strategy and action plan to develop a proactive communications and engagement plan.



ASSESSING SUCCESS

7. **What will success look like?** Achieving the stated vision will be the ultimate assessment of success for the NSFA. On our journey to achieving this vision, the NSFA will assess performance against the individual objectives (para 3) and the specific actions and tasks (Annex A) and we will work together in a collaborative manner according to our guiding principles (Annex B). On an annual basis (July NSFA meeting) members will be invited to affirm their commitment to the NSFA and the delivery of collaborative working in accordance with our guiding principles.

8. **Universal Stakeholder Buy In.** On an annual basis the stakeholders, who are the constituent members of the NSFA, will commit to work together by formally signing off the annual NSFA Overall Strategy and incorporate within their own organisation's strategy and plans.

⁵ For local operational/delivery groups to be successful, there will need to be multiple (to spread the load), probably covering either the district council areas (with a number amalgamated to ensure there aren't too many groups for those of us that cover the whole of Norfolk) or Anglian Water water recycling collection areas. Discussions are underway to see if KL&WN might consider joining Coastal Partnership East and therefore remove the need for a bilateral arrangement between the NSFA and KL&WN on coastal flooding matters.