

### **Sustainable development panel**

**Date: Wednesday, 23 March 2016**

**Time: 09:30**

**Venue: Westwick room, City Hall, St Peters Street, Norwich, NR2 1NH**

**Committee members:**

**Councillors:**

Bremner (chair)  
Herries (vice chair)  
Bogelein  
Grahame  
Jackson  
Lubbock  
Thomas (Va)  
Woollard

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## Agenda

### Page no

1 **Apologies**

To receive apologies for absence

2 **Declarations of interest**

(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)

3 **Minutes**

5 - 8

To approve the accuracy of the minutes of the meeting held on 24 February 2016.

4 **Landscape and Trees Supplementary Planning Document**

9 - 46

**Purpose** - This report covers the Landscape and Trees Supplementary Planning Document, which has been revised subsequent to consultation.

5 **Houses in Multiple Occupation - Interim Progress Report** 47 - 52

**Purpose** - This report is to update members on the progress made with issues relating to Houses in Multiple Occupation (HMOs). This interim update report has been produced as requested by members at sustainable development panel on 25 March 2015.

6 **Statement of Community Involvement - proposed revisions**

53 - 90

**Purpose** - This report is about a proposed revision to the city council's Statement of Community Involvement (SCI). The SCI is the council's formal code of practice which describes how people can expect to be involved in the planning process, setting out the standards that will be used to consult people and organisations about planning applications and plan-making. Preparing a Statement of Community

Involvement is a statutory requirement under the 2004 Planning and Compulsory Purchase Act.

Date of publication: **Wednesday, 16 March 2016**



**Sustainable development panel****09:30 to 11:00****24 February 2016**

Present: Councillors Bremner (chair), Herries (vice chair), Bogelein (from item 3 below), Grahame, Jackson, Lubbock, Thomas (Va) and Woollard

**1. Declarations of interest**

There were no declarations of interest.

**2. Minutes**

**RESOLVED** to approve the minutes of the meeting held on 13 January 2016.

**3. One Planet Norwich Festival 2016**

(Councillor Bogelein joined the meeting during this item.)

The environmental communications coordinator presented the report and, together with the environmental strategy manager, referred to the report and answered members' questions. The panel was advised that additional information about the event was available on the council's website.

During discussion the role of councillors at the event was considered. Members made suggestions on how councillors could be involved, such as handing out surveys and signposting visitors to the various activities. A member said that he would be attending the event and that it was not his intention to use the event as a political platform but that it was an opportunity for councillors to be seen promoting the objectives of the festival. It was noted that members had asked for more involvement after last year's event. The environmental strategy manager undertook to obtain clarification on the role of councillors in council organised events and the chair noted the comments made by members, but said that the arrangements were too far advanced to be altered at this stage.

The environmental strategy manager advised the panel of the list of councillors who had been invited to attend the Norwich and Norfolk Eco Awards ceremony. The county council would be represented this year by the councillors who were both city and county councillors.

Discussion ensued in which the environmental communications coordinator explained the arrangements for the fashion jam. The environmental strategy manager said that it had not been practical to hold the fashion show in The Forum on the Sunday because the catwalk would be a large structure which would impede the other activities. Also there were benefits in holding the fashion show at Norwich

Castle, as the organisers worked at the museum and it pushed out the message of recycling out to a different audience.

Members joined with the chair in congratulating the environmental communications coordinator for the idea of linking the festival with Norwich Fashion Week.

**RESOLVED** to note the report.

#### **4. Local Development Scheme 2016-17**

The planning team leader (policy) gave a detailed presentation of the report and together with the head of planning services and the planner (policy) answered members' questions.

During discussion the panel commented on working with other councils to produce the Greater Norwich Local Plan, which would replace the Joint Core Strategy and would go forward to 2036, and the Norfolk Strategic Framework. Members noted that the benefit of working with other councils was that it would reduce the cost of producing evidence. Members expressed concern that there could be dissent between councils across the county but noted that local authorities had a duty to co-operate.

Discussion ensued on the statutory requirement for registers of brownfield sites and self-build and custom build housing register. The government had yet to provide further guidance, but local planning authorities would need to demonstrate that land had been allocated to meet the demand for self/custom build. Members expressed concern that the government would require councils to reallocate sites currently allocated for council housing. The panel noted that there was greater demand for self or custom build in rural areas. The panel would be updated on the progress of these work streams.

The panel noted that the as government reduced the powers of local planning authorities it was necessary to strengthen other powers. The city centre strategy sought to protect the city's retail position against outer town developments.

Members also commented on the expiry of the Northern City Centre Area action plan at the end of the month. The panel noted that the recession had prevented the redevelopment of Anglia Square and sought clarification on the affect that the expiry of the action plan would have on the five year housing land supply. Members were advised that sites could be brought forward that had existing planning consent and that the brownfield register would be the best approach to incorporate sites which would no longer have an allocation.

Discussion ensued on the government definition of affordable housing and the issue of starter homes. Assurance was given to the panel that it would be consulted as appropriate and that further clarification on the government's proposals could be provided to members outside the meeting.

**RESOLVED** to agree the Local Development Scheme and recommend that cabinet approves it for publication under section 15 of the Planning and Compulsory Purchase Act 2004 (as amended by Section 111 of the Localism Act, 2011).

## **5. River Wensum Strategy update**

(Councillor Stonard, cabinet member for resources and income generation, and chair of the River Wensum Strategy Partnership board, attended the meeting for this item.)

The planning policy team leader (projects) presented the report answered members' questions.

Councillor Stonard praised the work of the officers in producing the draft strategy.

During discussion the panel noted the governance arrangements for the project board and project team. A database of stakeholders for wider consultation had been compiled last year and members were welcome to look at it and suggest the inclusion of organisations that they considered appropriate. A member pointed out that the Friends of Train Wood had not been informed of the outcome of the consultation. The panel noted that the consultation document was in the public domain and that some individual groups would be contacted as appropriate when detailed plans came forward for specific projects.

Discussion ensued on activities that could be promoted to encourage river use. The panel considered the popularity of outdoor swimming and whether there were parts of the river where it would be safe and practical to do so. The river was treacherous and a life guard would need to be available if swimming was to be promoted. Members also suggested events to provide funding for projects.

Members considered that there could be potential for hydro-power electricity generation at New Mills.

**RESOLVED** note the progress of the River Wensum Strategy.

CHAIR





<b>Report to</b>	Sustainable development panel	<b>Item</b>
	23 March 2016	
<b>Report of</b>	Head of planning services	<b>4</b>
<b>Subject</b>	Landscape and Trees Supplementary Planning Document	

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### **Purpose**

This report covers the Landscape and Trees Supplementary Planning Document, which has been revised subsequent to consultation.

### **Recommendation**

To recommend cabinet to adopt the Landscape and Trees Supplementary Planning Document.

### **Corporate and service priorities**

The report helps to meet the corporate priority to provide a safe, clean and low carbon city and the service plan priority to implement the local plan.

### **Financial implications**

There are no direct financial implications arising from this report.

**Ward/s:** All Wards

**Cabinet member:** Councillor Bremner – Environment and sustainable development

### **Contact officers**

Mike Burrell, planning policy team leader ☐ 01603 212525

Eleanor Larke, landscape architect 01603 212424

### **Background documents**

None

## Report

1. This report covers the Landscape and Trees Supplementary Planning Document (SPD), which is in appendix 1.
2. The Sustainable Development Panel is requested to recommend that cabinet adopts the SPD.
3. The SPD provides information for planning applicants to enable cost effective and efficient implementation of national planning and adopted Norwich Local Plan policies relating to landscape, trees and development. It achieves this through the provision of guidance on landscape design principles and by setting out best practice in relation to the incorporation of landscape within development proposals.
4. It also aims to encourage greater awareness of the importance of landscape and trees in development, and to ensure early consideration is given by the applicant to tree and landscape matters in order that the design of the development evolves to create a strong sense of place and character.
5. The SPD was considered in draft form by the panel in June 2015 following which it was subject to six weeks consultation. The consultation generated little comment. Indeed only two responses were received and both of these were supportive.
6. Following further consideration of the implications of the SPD on the speed and efficiency of decision making on planning applications, the council has just completed consultation on revising its local validation requirements. Validation requirements are reviewed from time to time to address changes to government guidance and to ensure the local plan is implemented effectively. The responses to this consultation will be reported verbally to sustainable development panel members at the meeting.
7. If implemented, revisions to the validation requirements will mean that applicants will have to provide appropriate and proportionate supporting information on landscape and trees at the time a planning application is submitted for it to be registered as valid. Discussions on landscape and trees can therefore be undertaken as part of pre-application discussions rather than during the formal determination period. This should reduce the overall time taken to decide the application.
8. The focus of this revised SPD is therefore now on providing good practice guidance, whilst procedural requirements are planned to be addressed through the validation checklist. This approach will retain coverage of all the topic areas consulted on in the draft SPD in July 2015, whilst providing a greater focus on good practice to assist developers in submitting good quality applications and enabling applications to be processed effectively.

The background of the page is a large aerial photograph of a city, likely Norwich, which has been processed with a mosaic or pixelated effect. The colors are muted, with greens for trees and parks, and various shades of grey, brown, and red for buildings and roads. The right side of the page is partially covered by a light blue vertical band.

# Landscape and Trees Supplementary Planning Document

# **Landscape and Trees**

## ***Supplementary Planning Document***

### **Structure**

#### **1.0 Introduction**

##### **1.1 Summary**

##### **1.2 Purpose of the document**

##### **1.3 The importance of Landscape and Trees in Norwich**

#### **2.0 Design principles**

##### **2.1 General**

##### **2.2 Integrating development into surroundings**

##### **2.3 Making good use of the site and existing features**

##### **2.4 Incorporating open space**

##### **2.5 Environment and Green Infrastructure considerations**

##### **2.6 Street layout**

##### **2.7 Future maintenance**

#### **3.0 Appendices**

**Appendix 1 – The design and construction process and tree care**

**Appendix 2 – British Standards relevant to vegetation management and development**

**Appendix 3 – Tree planting and establishment costs 2016-2017**

**Appendix 4 – The Legal and Policy Framework**

**Appendix 5 – Nature conservation**

**Appendix 6 – Glossary**

**Appendix 7 – Schedule of consultee comments and Norwich City Council responses**

## 1.0 Introduction

### 1.1 Summary

This Supplementary Planning Document (SPD) provides information for planning applicants to enable cost effective and efficient implementation of national planning and adopted Norwich Local Plan policies relating to trees, landscape and development. It achieves this through the provision of guidance on landscape design principles and sets out best practice in relation to the incorporation of landscape within development proposals.

It also aims to encourage greater awareness of the importance of landscape and trees in development, and to ensure early consideration is given by the applicant to tree and landscape matters in order that the design of the development evolves to create a strong sense of place and character.

The required supporting information to be submitted with applications, in particular drawings and documents is outlined in the Norwich City Council validation requirements list. This includes further information for each type of document, including landscape and Arboricultural specific information in line with the type, scale and size of proposal.

### 1.2 Purpose of the document

This SPD aims to encourage greater awareness of the importance of landscape and trees in development, and to ensure early consideration is given to tree and landscape matters so that development will have a stronger sense of place and character and will help to achieve a higher quality environment. Consultation responses for the draft Landscape and Tree SPD are included in appendix 7.

The main purpose of this document is to provide clarity for those involved in the submission of planning applications, of the standards that the Council will expect from new development proposals as they relate to trees and the landscape.

Where additional advice is required, the professional services of a landscape designer, landscape architect or arboriculturalist should be sought as appropriate. Contact details for Landscape Architects and explanation of their services can be obtained from the Landscape Institute at [www.landscapeinstitute.org](http://www.landscapeinstitute.org) and arboricultural services at [www.trees.org.uk](http://www.trees.org.uk).

Applicants should be aware that adherence to the local plan policies is a material consideration in the assessment of all planning applications and should therefore consider the content of the relevant policies set out below.



Adherence to the principles set out in this guidance will help ensure that schemes requiring a planning application will assist:

- in meeting National and local legislative and policy requirements and
- and ensure that trees and landscape features are afforded due consideration in the development of the design.

The relevant local policies include:

**Joint Core Strategy**

JCS1 (Climate change and Environmental Assets)

JCS2 (Design), which promote high quality landscaping to create a strong sense of place in new development and the development of green infrastructure networks,

**Development Management policies**

DM3 (Design),

DM6 (Natural Environment)

DM7 (Trees)

As trees and landscape are a cross cutting topic and play a vital role in ensuring development is of a high quality and is sustainable, the SPD also relates to a number of other policies, including DM1 (Sustainable Development), DM2 (Amenity), DM5 (Flooding), DM8 (Open Space), DM12 (Housing development) and DM28 (Sustainable travel).

The [Norwich site allocations and site specific policies local plan](#) sets out detailed policies and proposals on 72 sites across the city where change is anticipated or proposed, setting out preferred land uses for those sites including housing and employment. Site allocations policies set development requirements on allocated sites in relation to landscape and trees, including requirements to retain specific tree groups, create links to existing woodland, retain views and, mainly on larger sites, create new open spaces and enhance biodiversity.

The JCS policies are available [here](#) and the DM policies [here](#). A summary of the legal framework and the policies is in appendix 4.

Applicants should be aware that planning applications require a range of supporting information. The nature and extent of this information in relation to trees and landscape is set out in the Norwich City Council planning validation requirements checklist.

### 1.3 The importance of landscape and trees in Norwich

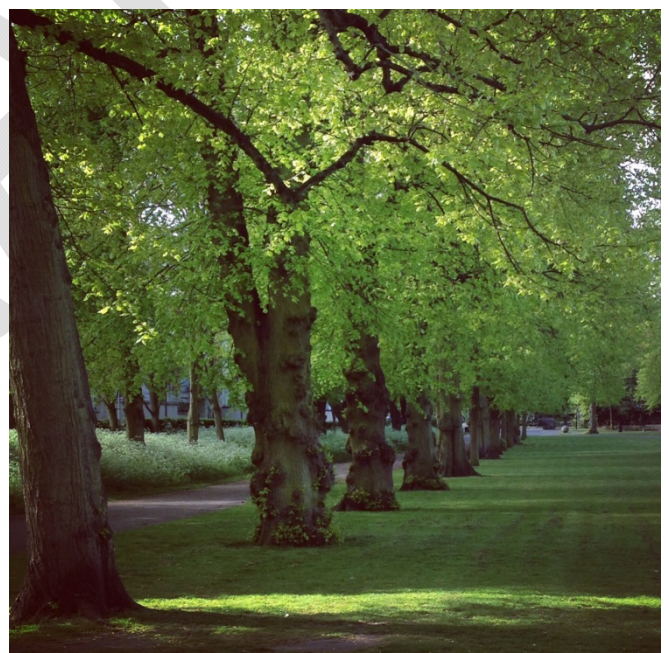
Landscapes evolve through time as the result of both natural and human activities and are a representation of the complex relationship between people, place and nature. Landscape is more than just a view, or natural scenery. For the purposes of this SPD the term 'landscape' is a zone or area whose visual features and character are the result of the action of natural and or cultural factors and includes the trees within it.

Norwich's built and natural environment is of generally high quality and is characterised by a tight urban form, well provided with green open spaces and trees and exhibiting a historic townscape of particularly high quality reflecting its development over the past 1,000 years. It is these qualities that provide the local distinctiveness and character that new developments are expected to take account of.

From natural environments such as the Yare Valley, to parks and gardens, street planting and community spaces, landscapes and individual trees, all add great beauty and a sense of place and character to our city's built and natural environment and are valuable for a number of reasons.



*Landscape character within the Yare Valley, parkland near the UEA Broad*



*Tree lined walkway, Chapelfield Gardens*

Well-designed landscapes offer a variety of form, texture, colour, shape and seasonal change; they also complement the built environment by providing screening, perspective, focal points, privacy and seclusion. They define and separate open spaces whilst providing vital habitats for wildlife. Green spaces and quality landscapes are proven to have health and social benefits, they also help promote economic growth by creating attractive environments which promote investment. Landscape and trees also have an important role in climate change adaptation and water management in the urban environment; by providing shelter, cooling shade and helping to slow rainwater runoff.

Trees in particular enhance the structure and layout of our city, many providing important landmarks. Due to the status of trees as a landscape feature they are also subject to specific guidance and regulations regarding their protection. Additional guidance on the protection of trees can be found on the council's website and specific guidance is provided within the [validation checklist](#) on the documentation required to demonstrate adequate protection of trees during design, planning and construction. Relevant British Standards should also be referred to for additional guidance relevant to vegetation management and development proposals, the design and construction process and tree care from BS 5837: 2012 is summarised in the table appendix 1, and other relevant British Standards listed appendix 2.



## **2.0 Design principles for landscape**

### **2.1 General**

Alongside the retention of existing landscape elements and trees, many opportunities for new tree and landscape planting arise through the development process. Where early consideration is given to tree and landscape matters, it is likely that the design of the development will promote a stronger sense of place and character and thereby achieve a higher quality environment.

To comply with adopted Local Plan requirements, the Council therefore expects to see evidence that landscape matters have been clearly considered as part of the design process.

The principles set out below are intended as a series of prompts for planning applicants and their designers. They are intended to be objective and provide guidance on basic design issues that will be relevant to most sites. However, the design response will need to be specific to each site and therefore it is not intended that the information provided in this document is prescriptive about how to deliver the design principles. These principles also illustrate aspects considered by the Planning Authority's officers when considering an application.

## 2.2 Integrating development into surroundings

### Key principles

All sites form part of a wider landscape or townscape, any change has the potential to positively or negatively impact the surroundings. New developments should seek to enhance the local character and positively link to their surroundings

### Guidance

Norwich has a diverse character, with a historic area centred on a main river, extensive areas of open space, historic parks and gardens, wildlife sites and wooded ridges in the city. Policies DM1 and DM3 specifically recognise the importance of local distinctiveness and character. The most successful schemes will be those that fit in with in their surroundings and have a strong sense of place, character and quality.

Consideration and analysis of a site's context and setting will help identify the important factors lying outside the site that have an influence on it and it will also help establish associated design opportunities and constraints for the site. To understand the relationship between the site and its surroundings, desktop studies of local environment and local plan context should be supported by on site analysis of the local landscape or townscape character. Accesses, boundaries, linkages, consideration of the visibility of the site and identification of sensitive views should be considered.



*Analysis plan, Bowthorpe Three Score*

Designs should seek to enhance the local character whilst physically and perceptually linking to their surroundings. This is of particular importance to sites in areas designated for nature conservation, green infrastructure and the built environment. Norwich has specific appraisals relating to [Conservation Areas](#), which along with urban design and streetscape analysis contain important information on natural character and highlight opportunities for management and enhancement in each Conservation Area. These should be referred to as part of the analysis. The river networks of the Yare and Wensum are, in part within the city, designated as National Park, therefore specific consideration needs to be given to developments lying adjacent to their banks.

The design of site boundaries is important. Screening can be useful in protecting boundaries and views and can also buffer land uses. However, boundary treatments should be designed to protect quality scenic views and vistas in and out of developments. The assessment of the site's context should help to determine the appropriate types of boundary treatment which should be designed to take account of local landscape character to avoid becoming visually intrusive in themselves. Simply screening a development is not a substitute for good design or a replacement for adopting measures to integrate a design into an area.

On sites where buffer zones are required, these may comprise grass, shrubs and trees; structure planting belts; sympathetically graded earth mounding; walls or fencing; or a combination of several of these.

Physical links provided by planting and access routes to the surrounding areas are of equal importance and can be an effective means of integrating a shared identity and community. Sites should wherever possible also link their boundaries into surrounding landscape through Green Infrastructure (GI).

#### Considerations

- *Context analysis*
- *Visibility of site and identification of sensitive views*
- *Analysis of access, boundaries, physical links*
- *Boundary treatments*
- *Integration into surroundings*

#### Integrating development into surroundings

*Policies DM1, DM 2, DM3, DM6, DM7, DM12, DM28*



## 2.3 Making good use of the site and existing features

### Key principles

Developments should make efficient use of land and topography, and retain or enhance existing features of value. Developments should be designed to take advantage of the site itself and its location.

### Guidance

When undertaking a site analysis, characteristics and features within the site that could influence design need to be taken account of. Existing features which provide a positive contribution to the character of an area should be identified, assessed and incorporated into designs where possible. These features could include wooded areas, mature trees and hedgerows, watercourses, and other ecologically valuable features.

Analysis of site topography will also highlight constraints or opportunities for a development especially in relation to the treatment of site boundaries.

Historically or culturally significant buildings and built features built may also form part of landscape character and should be acknowledged as such. Consideration of the physical and perceptual characteristics of a site may also influence the use of materials for new buildings and landscape within the site.



*Hard and soft landscape materials influenced by site character, The Great Hospital  
Image courtesy of Tessa Hobbs Garden Design*

The retention of positive or beneficial existing site features can contribute to the local distinctiveness and character of a development, as recognised under policy, and help to provide sense of place and early maturity.

#### Considerations

- *Existing features identified, retained and integrated into development*
- *Physical and perceptual characteristics identified and protected*
- *Design influence by existing character*
- *Materials influenced by existing features and characteristics*

#### **Making good use of the site and existing features**

*Policies DM1, DM3, DM6, DM7, DM12*

## 2.4 Incorporating open space

### Key principles

The protection of existing open space and provision of new open space on development sites are requirements under Policy DM8, supported by the Supplementary Planning Document for Open Space and Play. In addition, where there is a requirement for open space, Policy DM3 recognises the importance that public and private open space is well integrated into the overall design of the development.

### Guidance

Open space should be located and designed to achieve good natural surveillance, good access and connectivity to the surrounding area, and wherever possible will maximise opportunities to link into the wider strategic green infrastructure network.

The design of open spaces should contribute to the character of the surrounding area either by reflecting distinctiveness and identity and enhancing the character of the existing surroundings or by creating new character for a development if little exists.

Open spaces need to provide a clear purpose, use and respond to the needs of the local community to ensure their success. In most cases it will be possible to take a multifunctional approach with opportunities for enriching ecology, alleviating pressures from flood, and to promote health and wellbeing through spaces for sport, play, recreation and community events.





*Play area incorporating SuDs features provides a practical and educational function, making our relationship with water visible to the local community, Eagle Walk*

Open space should be attractive and contribute to promoting biodiversity. An approach to planting that achieves biodiversity and year round interest is encouraged. There are often opportunities within open spaces to plant specimen trees that would be too large for streets or gardens, which may offer great value in terms of character and focus for the community.

It is important that the hierarchy between public, semi public and private spaces is balanced through the design. This can be achieved through the use, position and character of soft and hard materials.

Additional guidance on the provision of open space can be sought through the pre-application advice service, as encouraged within the Open Space SPD.





*Useful networks of footpaths connect historic and new buildings, in this space flexible enough to use for community events, The Great Hospital. Image courtesy of Tessa Hobbs Garden Design*



*Multifunctional features and planting providing seasonal interest, Leonard Street Play area*



### Considerations

- *Good natural surveillance*
- *Space linked to wider network of landscape and routes*
- *Clear purpose, which responds to needs of community*
- *Dual or multi functions*
- *Contribute to local character*
- *Diverse and interesting planting*

### Incorporating open space

*Policies DM1, DM2, DM3, DM5, DM8*

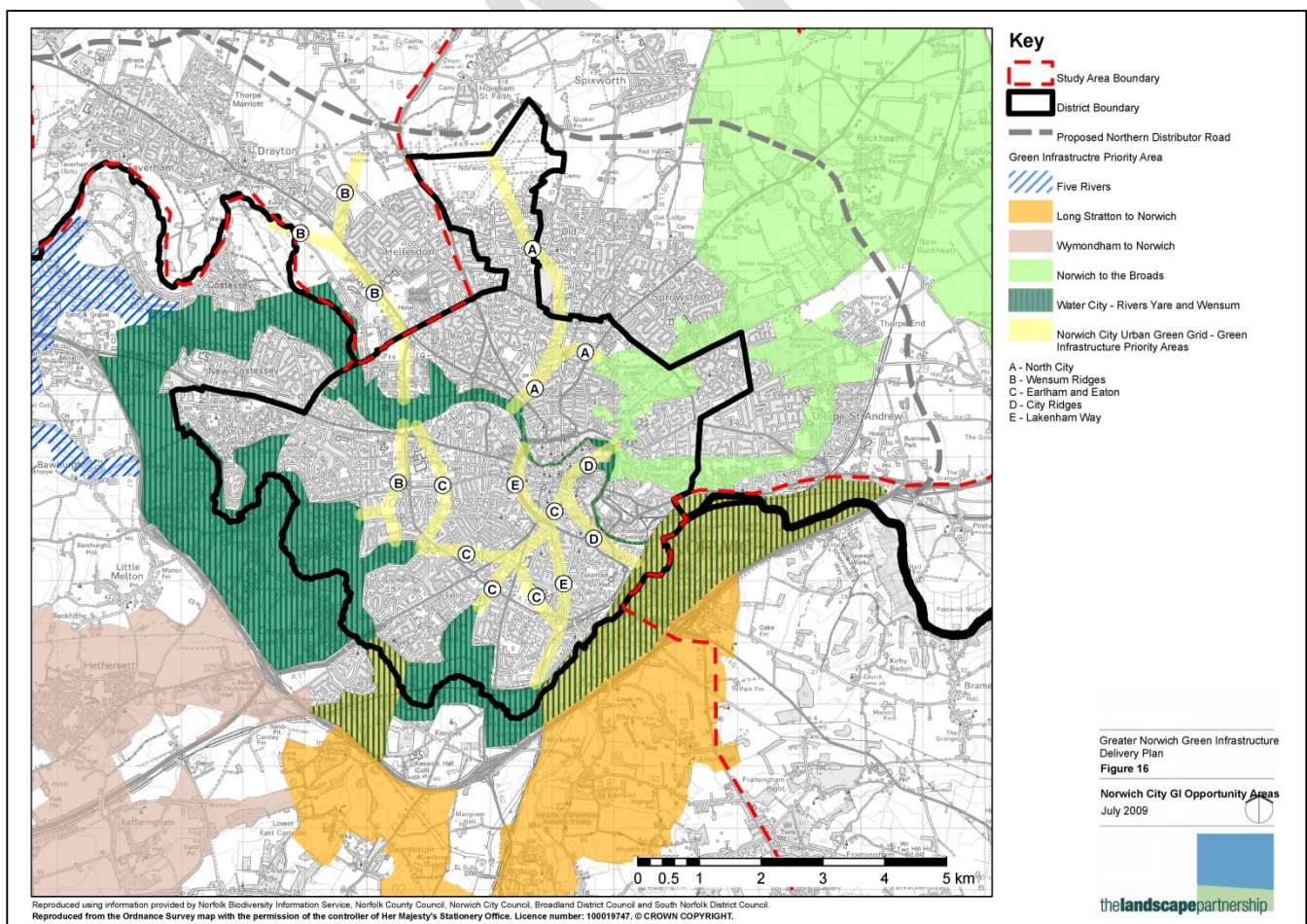
## 2.5 Environment and Green Infrastructure considerations

### Key principles

Good planning of landscape offers the opportunity to achieve multiple benefits. The council welcomes landscape designs that incorporate the principles of sustainability. Wherever possible, landscaped spaces will need to increase biodiversity and wildlife enhancement, include SuDs and provide accessible routes and networks to facilitate connections (people, plants and animals) to surrounding areas. Developments should also aim to make space for trees.

### Guidance

The provision of green space within a development is important and will provide value and a range of benefits, additional consideration of strategic connections to other nearby features will significantly increase the benefit. Wherever possible, sites should link their boundaries to surrounding landscapes through green infrastructure (GI). Sites should be designed to contribute to the GI network in Norwich. The core area of the network is set out in the [Greater Norwich Green Infrastructure delivery plan](#).



Greater Norwich Green Infrastructure Delivery Plan, Norwich City GI Opportunity Areas

By definition, green infrastructure can provide a variety of functions and benefits including biodiversity enhancement, water management, connectivity, health and wellbeing in addition to providing an attractive area. Therefore where a green infrastructure approach is possible this will be of mutual benefit to meeting other policy requirements. Where enhancements to the green network and strategic green infrastructure are required, they should be appropriate to the location and character of the area. The Greater Norwich Green Infrastructure Delivery Plan provides additional guidance on opportunity areas.

Existing vegetation on sites can often provide important, established habitats. Developments should seek to retain native landscape features and consider opportunities to extend similar or provide new types of habitats in key locations to ensure that ecology is an integral part of the site proposals and wider ecological network. Consideration should be given to the selection of boundary treatments such as mixed species hedges that have potential to improve biodiversity rather than prohibit wildlife. Sites that have boundaries with rivers or other water courses also present opportunities for habitat enhancement.



*Amenity space incorporating seating, connectivity to river walk, and a naturalistic approach to planting, Dragonfly House*





*Extract from Green Infrastructure improvements analysis, Newmarket Road Bus Rapid Transit Route*

It is acknowledged that some sites require solid boundary treatments such as timber fences, and where this is the case should include hedgehog holes to make sure they are permeable. Even the most difficult sites have the potential to limit their environmental effects; the use of lighting for example should be sensitively designed to limit impact on wildlife populations, and artificial habitat features including bat and bird boxes and habitat piles can provide positive enhancement.

Ornamental planting and semi-ornamental planting also has potential to serve an ecological function, and the use of ecologically informed non-native planting mixes will be particularly encouraged on urban sites where a native species approach is not appropriate. The style of planting can also contribute to ecological value, for example an informal or naturalised planting will provide more variation of species and plant communities than mass planting. Flowering and berry bearing plants will provide a good food source for insects and birds. Generally speaking, double-flowered plant varieties are of much less value for insects and should be avoided. Further information and advice can be found on the web sites of UK nature conservation organisations, listed appendix 5.

There are a number of SuDs techniques that not only help comply with national and local flood policy, but offer benefits to landscape and ecology due to their ability to incorporate a range of habitats and plant material. These include green roofs, SuDs basins, ponds and constructed wetlands, filter strips, swales and rain gardens, all of which provide opportunities to enhance the visual appearance of a development and contribute to biodiversity. Where any of these measures are included in a development, early discussion with the Natural areas officer on the use of planting appropriate to the specific context is encouraged.

#### Considerations

- *Link boundaries to surrounding landscape*
- *Retain and enhance habitats*
- *Link into wider ecological network*
- *Planting designed to contribute ecology*
- *Consideration of landscape enhanced SuDs*
- *Limit environmental effects*

#### Environment and Green Infrastructure considerations

*Policies DM1, DM3, DM5, DM6, DM8*

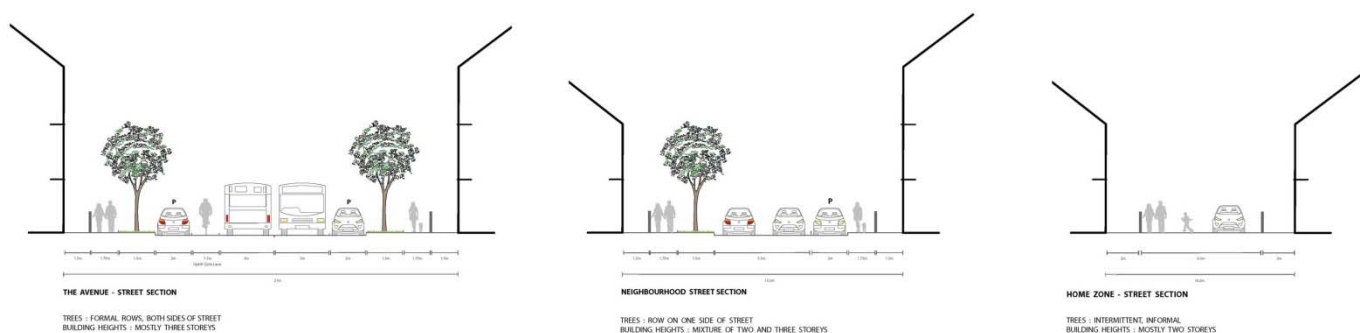
## 2.6 Street layout

### Key principles

The layout of developments and their streets will determine access networks both within and beyond its boundaries. Buildings and landscape associated with streets should reinforce the street hierarchy principles of the site layout which will help the user to understand this hierarchy and thereby improving usability.

### Guidance

Where layouts and street designs work with the character of the development and the surroundings they will respond to the way people access and move through the site, with appropriate provision for vehicles, cyclists and pedestrians. For larger developments effective landscape proposals will also contribute to achieving a hierarchy of circulation, highlighting key routes and providing appropriate variation in character.



*Different approaches to street design, with variation of width, building heights and uses, providing different characters*

Many factors including the scale, massing and layout of built form and formality the layout will influence the character of streets. Consideration should be given to how appropriately the street layout relates to the local character and distinctiveness and reference should be made to [Conservation Area Appraisals](#). As streets provide the main navigation routes through developments, consideration should be given to key views and vistas they create, into and out of a development. The appropriateness of focusing views on new marker buildings of significant quality, or existing local landmarks or landscape features beyond the site boundaries should be considered on a site by site basis.



The design and use of boundary treatments and semi-private spaces fronting on to streets will undoubtedly contribute to character and distinctiveness of an area, so their design should be carefully considered.

Adequate provision of street trees and other planting, along with choice of hard materials, street furniture and lighting will also contribute to the character and appearance of streets and the public realm and provide balance to ensure that parking areas and carriageways do not dominate a scheme. Key considerations when specifying these elements should be for the robustness of materials, appropriateness for context and local character and ability to maintain them in perpetuity.



*Materials specified to be in keeping with local character and to adoptable standards, Quayside*

Street trees provide a number of functions within a design, the environmental benefits include providing shading, improved air quality, providing soft areas to assist in natural drainage and enhancing biodiversity. They also have a function in terms of our experience of a space and can effectively enclose a street to provide a human scale, provide a sense of maturity and quality, enhance character, and reinforce the nature of the street hierarchy to aid navigation.

Where it is appropriate to do so, the Council will require street trees to be included in the landscape scheme, as required under Policy DM7. This will include new streets created within developments in appropriate circumstances and where developments front onto a street with trees

in the highway already. Schemes should therefore include an appropriate amount of space for trees within street layouts.

On a site specific basis Council officers will specify the number of street trees required with due consideration given to available planting space and planting distances. Where the highway is not within the development boundary and planting is appropriate on that frontage, a commuted payment for street tree planting will be sought through a section 106 agreement or a unilateral agreement.

The commuted sum will be based upon the planting and establishment costs that are current on the signing date of the section 106 agreement, and will be sufficient for a thirty year period, an example for the financial year 2016-2017 is indicated appendix 3 and is based upon the minimum initial cost for a tree. The costs are in line with the Council's current tree contract; selection of trees will be carried out by the Council's arboricultural officer as scheduled into the Council's next planting programme.

Widths of footpaths and carriageways should be appropriate to the streets function, and in accordance with national and local guidance including National Planning Practice Guidance on design, the Manual for streets, the city council's local Streetscape design manual and ACPO's Secured by design website.

Policy requires that areas for vehicle movements and parking areas create convenient, safe and attractive environments rather than dominate a scheme. Car parking requirements should be balanced with adequate landscaped areas the location and size of which should support the proposed planting. To maximise ecological and aesthetic benefit of landscape within parking areas, landscaped areas should be linked across a site and into site boundaries and small isolated areas of landscape should be avoided. Where trees are proposed in hard landscaped areas, sufficient consideration will need to be given to tree pit design to support the tree root volume requirements and protection of surrounding hard landscaped areas from root damage. There are a variety of proprietary products on the market that may assist in helping to achieve good and sustainable growing conditions for trees.





*Pedestrian access along the river frontage is well surveyed by buildings, and spaces are defined with soft planting and boundary treatments to establish private and publicly accessible areas, The Moorings*

### Considerations

- *Provision for vehicles, pedestrians and cyclists*
- *Clear hierarchy of circulation, with appropriate variation in character*
- *Appropriate materials, designed to adoptable standards if relevant*
- *Views and vistas protected and planned in*
- *Clearly defined public, private and semi-private spaces*
- *Sufficient space for trees and landscape in streets and parking areas*

### Street layout

*Policies DM1, DM3, DM7, DM28*

## 2.7 Future maintenance

### *Key principles*

Planned maintenance operations are required for hard and soft landscape areas to sustain attractive and successful landscape settings. To ensure landscapes are managed from the outset and in perpetuity it is important that responsibilities are established during the planning process.

### *Guidance*

Arrangements for future management and maintenance of public and other spaces should be fully understood at a design stage so that they can be properly planned for. Consideration should be given at a design stage to who will take over the landscape management responsibility for the site. This could be a management company, community trust, or the responsibility could be retained by the applicant. The local authority may adopt areas that are designed to adoptable standards for hard and soft landscape materials. The council will not adopt verges containing shrub and herbaceous planting, however trees are acceptable and further detail can be found in section 2.6.

Maintenance issues can be designed out by avoiding isolated areas of landscaping with no sense of ownership, providing clear boundaries and clarity over hierarchy of public, semi-private and private spaces, and selecting appropriate plant material. Provision of footpaths on desire lines, the use of robust materials in areas accessible to the public and planning in natural surveillance can assist in minimising issues of misuse or vandalism.



*Poorly planned boundary treatments creating difficult to maintain areas with no sense of ownership*



*Failure of small isolated planting bed within parking area*

## Considerations

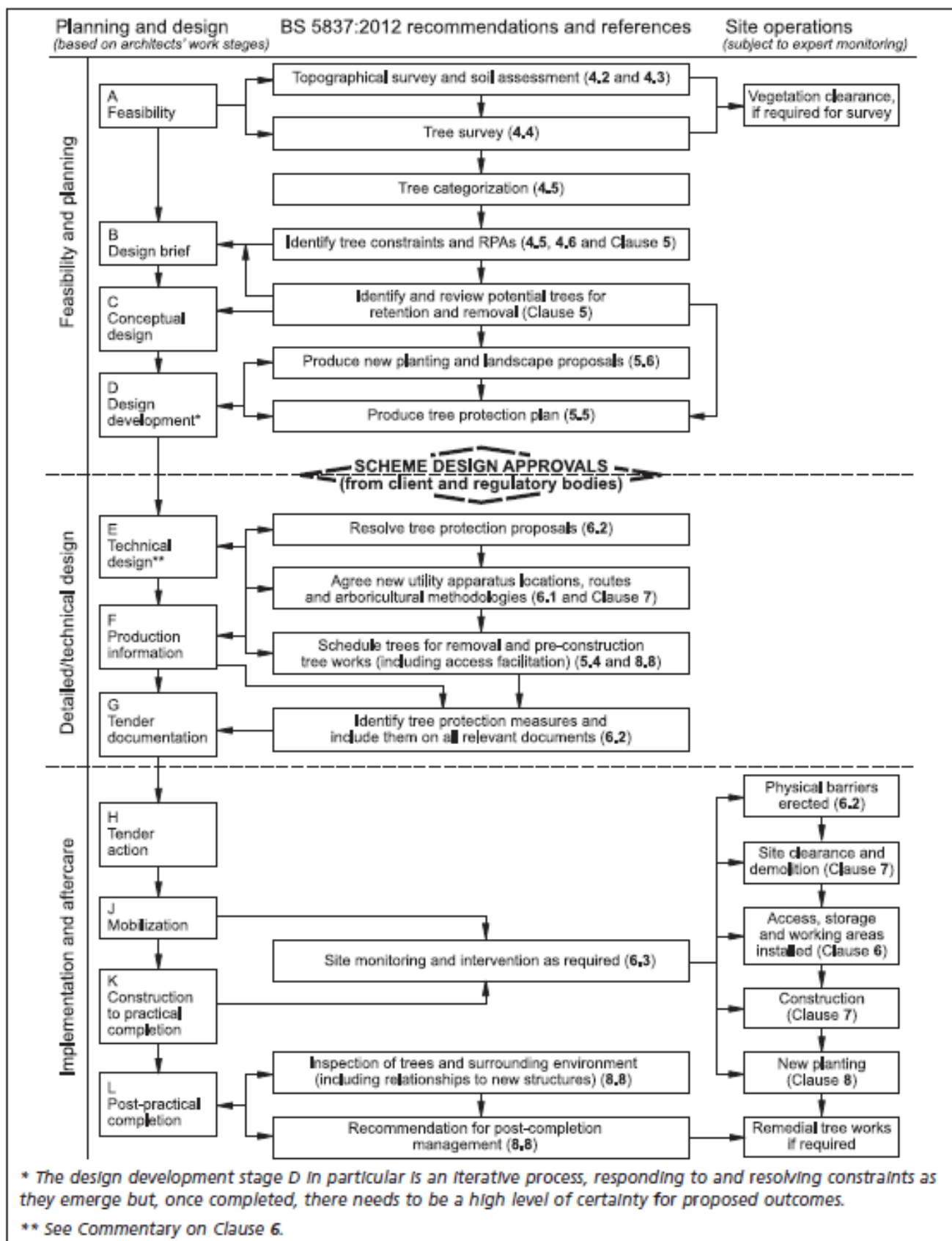
- *Maintenance considered on and clear demonstration of ability to deliver*
- *Clarity over maintenance responsibilities*
- *Clear sense of ownership for planted areas*
- *Good surveillance*
- *Provision of footpaths on desire lines*

## Future maintenance

*Policies DM1, DM7*

DRAFT

## Appendix 1 - The design and construction process and tree care





## Appendix 2 - British Standards relevant to vegetation management and development proposals

British Standards that apply to vegetation management and development proposals. (*NB BSI standards are subject to regular revision*)

<b>BS 5837</b>	Trees in relation to construction - Recommendations (2005)
<b>BS 1192</b>	Construction drawing practice Part 4 Recommendations for landscape drawings
<b>BS 1377</b>	Methods of test for soils for civil engineering purposes
<b>BS 1722</b>	Fences Part 1 Specification for chain link fences Part 4 Specification for cleft chestnut pale fences
<b>BS 3936</b>	Nursery Stock Part 1 Specification for trees and shrubs Part 4 Specification for forest trees Part 5 Specification for poplars and willows
<b>BS 3998</b>	Recommendations for tree work
<b>BS 4043</b>	Recommendations for transplanting root-balled trees
<b>BS 4428</b>	Code of practice for general landscape operations (excluding hard surfaces)
<b>BS 5930</b>	Code of practice for site investigations
<b>BS 8004</b>	Other relevant publications: 'Low-rise building on shrinkable clay soils: Part 1'
<b>BRE</b>	BRE Digest 240 : 1980 BRE Digest 298 : 1985 'The influence of trees on house foundations in clay soils' NHBC Standards, Chapter 4.2 'Building near trees'
<b>NJUG</b>	National Joint Utilities Group – Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees.
<b>AAIS</b>	APN1. Driveways Close To Trees

## Appendix 3 - Tree planting and establishment costs 2016 -2017

**Note: Costs are updated annually in line with retail price index (RPI)**

Tree planting and establishment costs 2016 -2017		contract inflation	2.2910%
<b>Year 1</b>		16/17	
Tree purchase		£68.70	
Plant heavy standard		£52.57	
Wood tree surround		£27.48	
Erect tree surround		£17.54	
Mulch tree		£9.36	
Water tree (12 visits p/a @ £4.43)		£55.63	
Young tree maintenance		£18.72	
		<b>£250.00</b>	
<b>Year 2 - 4</b>	Each tree will be inspected <b>2</b> times between years 2 and 4		
Water tree (12 visits p/a @ £4.43)		£111.26	
Young tree maintenance		£37.44	
		<b>£148.70</b>	
<b>Year 5 - 15</b>	Each tree will be inspected <b>3</b> times between years 5 and 15		
Crown raise		£40.74	
Formative prune		£13.58	Once
Remove frame		£5.86	Once
Weed tree pit		£14.05	
		<b>£74.23</b>	
<b>Year 16 - 20</b>	Each tree will be inspected <b>3</b> times between years 16 and 20		
Crown raise		£40.74	
Weed tree pit		£14.05	
Formative prune		£13.58	Once
		<b>£68.37</b>	
<b>Year 21 - 25</b>	Each tree will be inspected <b>3</b> times between years 21 and 25		
Crown raise		£163.01	
Weed tree pit		£14.05	
		<b>£177.06</b>	
<b>Year 26 - 30</b>	Each tree will be inspected <b>3</b> times between years 21 and 25		
Crown raise		£162.99	
Clean out / remove deadwood		£162.99	
Weed tree pit		£14.03	
		<b>£340.01</b>	
<b>Total</b>		<b>£1,058.37</b>	

## Appendix 4 - The Legal and Policy Framework

### Legislation

14. Section 197 of the Town and Country Planning Act 1990(as amended) states that it shall be the duty of the local planning authority

(a) “To ensure whenever it is appropriate that, in granting planning permission for any development, adequate provision is made by the imposition of conditions for the preservation or planting of trees”.

(b) “To make such orders (*Tree Preservation Orders*) under Section 198 as appear to the authority to be necessary in connection with the grant of such permission, whether for giving effect to such conditions or otherwise”.

In support of Norwich City Council's duty as set out in the 1990 Act, policies relating to trees and woodlands are incorporated within the Local Plan.

Local authorities also have a duty to have regard to the conservation of biodiversity in exercising their functions. This duty was introduced through the Natural Environment and Rural Communities Act and came into force on 1 October 2006. The duty affects all public authorities and aims to raise the profile and visibility of biodiversity, to clarify existing commitments with regard to biodiversity, and to make it a natural and integral part of policy and decision making. Conserving biodiversity includes restoring and enhancing species populations and habitats, as well as protecting them.

### National policy

The National Planning Policy Framework (NPPF) requires local authorities to protect valued landscapes. It also sets a requirement to minimise impacts on, and provide net gains in biodiversity, where possible, aiming to halt the overall biodiversity decline which has occurred over recent years.

The NPPF also states that plans should identify and map local ecological networks, including: international, national and local sites of importance for biodiversity, wildlife corridors and areas identified by local partnerships for habitat restoration or re-creation. This involves planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.

## Local policies

The Norwich Local Plan contains a number of relevant policies, most particularly JCS 1, 2, 11 and 20 and DM 3, 6 and 7.

A summary of these policies is set out below, along with other relevant policies (DM1, DM2, DM4, DM5, DM8, DM12 and DM28).

## The JCS

Policies in the [Joint Core Strategy](#) (JCS) for Broadland, Norwich and South Norfolk (adopted 2011, amendments adopted 2014) provide the strategic framework for the Norwich Local Plan.

**JCS1** (Climate change and Environmental Assets) protects environmental assets and requires the development and maintenance of the green infrastructure network set out on page 33 of the JCS. This network was identified through evidence studies supporting the JCS. This includes the map in appendix 3 of this document which identifies the Yare and Wensum valleys and as sub regional green infrastructure corridors and green infrastructure hubs. It proposes development of a new corridor from Mousehold Heath to the north east into Broadland. It also identifies local corridors and County Wildlife Sites.

**JCS2** (Design) requires development to be designed to the high possible standards to create a strong sense of place and to respect local distinctiveness. Landscaping will play a key role in this.

**JCS10** (Locations for major new or expanded communities in the Norwich Policy Area). The green infrastructure map supporting this policy on page 69 of the JCS also identifies the Yare and Wensum valleys and as priority areas for green infrastructure.

**JCS11** (Norwich City Centre) requires an integrated approach to economic, social, physical and cultural regeneration to enable greater use of the city centre and enhancement of its regional centre role. To support this, improvements will be required to open spaces, green linkages and connections between open spaces, linking the river corridor and the open countryside. The City Centre key diagram identifies opportunities for enhanced principal Green Links.

**JCS12** (Remainder of the Norwich urban area) promotes development to support sustainable housing and employment growth and regeneration in the rest of the urban area and fringe



parishes, including the promotion of green infrastructure links and protecting the landscape setting of the city.

**JCS20** (Implementation) requires development to provide and maintain open space and green infrastructure to secure sustainable development, specifically identifying the need for trees, hedgerows, woodland and landscaping as well as habitat creation and parks.

## **DM Policies Local Plan**

The [Development Management Policies local plan](#) provides more detailed policies for Norwich.

**Policy DM3** requires all new developments to achieve a high quality built and natural environment, building on the strength of existing design and promoting local distinctiveness. It requires all new development to make appropriate provision for the protection of existing and provision of new green infrastructure. The policy expects identified gateway sites to be marked by development of exceptionally high quality that reflect distinctiveness, and seeks to manage and control development which could affect key long views.

DM3 also requires developers to make efficient use of space, provide a permeable and legible network of routes and spaces for public access, and incorporate well-designed and well-defined private, semi-private and public open space for all developments. The design of streets, routes and spaces that enhance the environment will be required.

**Policy DM6** implements national and JCS requirements to ensure the protection, management and enhancement of the city's valued natural environmental assets and, along with policy DM3, requires green infrastructure networks to be promoted through development.

**Policy DM7** specifically covers trees and development. It requires trees and significant hedges and shrubs to be retained as an integral part of the design of development except where the trees are in poor condition or there are exceptional benefits in accepting their loss, and sets out the requirements for replacement planting where the loss of trees is accepted.

DM7 also requires street trees to be provided on new developments, either on site or through a section 106 or unilateral agreement as and where appropriate.

In addition the SPD also relates to the following policies:

- **Policy DM1** sets out sustainable development principles for Norwich and establishes the expectation that development proposals will protect and enhance the physical

environmental and historic assets of the city and safeguard the special visual and environmental qualities of Norwich for all users;

- **Policy DM2** requires for residential developments the provision of external private or communal amenity space, appropriate for and integral to the residential development and forming a key part of the overall design of the site;
- **Policy DM4** identifies landscaping as a mitigation measure to minimise potential negative visual impacts of renewable energy generation schemes;
- **Policy DM5** stipulates that development proposals will be assessed and determined having a regard to the need to manage and mitigate against flood risk;
- **Policy DM8** requires all new development involving the construction of new dwellings to contribute to the provision, enhancement and maintenance of local open space;
- **Policy DM12** requires proposals for residential development to have no detrimental impact upon the character and amenity of the surrounding area including open space and designated and locally identified natural environmental assets;
- **Policy DM28** requires proposals to incorporate measures to aid sustainable travel, including integral links within the development and the surrounding area, along with specific treatments where development proposals front on to the rivers Wensum and Yare.

These policies will ensure that development is planned to take a comprehensive view of tree issues and landscape features at an early stage in the design process.

## Appendix 5 – Nature Conservation

Additional information and resources for nature conservation

### Strategic

#### [Natural England](#)

The government's adviser for the natural environment in England, helping to protect England's nature and landscape for people to enjoy and for the services they provides

#### [Landscape Institute](#)

The Landscape Institute is the **Royal** Chartered Institute for Landscape Architects and Landscape professionals, including landscape designers, landscape managers, landscape planners, landscape ecologists and urban designers

#### [JNCC](#)

JNCC is the public body that advises the UK Government and devolved administrations on UK-wide and international nature conservation.

#### [National Character Area profiles](#)

The NCA profile documents explain how you can access and use environmental evidence and information about places.

### General

#### [Buglife](#)

An organisation devoted to the conservation of all invertebrates, includes 29 member organisations

#### [Buglife member organisations](#)

29 Member organisations who help support and develop the work of Buglife

#### [RPPB](#)

The RSPB is the country's largest nature conservation charity, inspiring everyone to give nature a home

#### [Norfolk Wildlife Trust](#)

Norfolk Wildlife Trust is the oldest Wildlife Trust in the country. The purchase of 400 acres of marsh at Cley on the north Norfolk coast in 1926 to be held 'in perpetuity as a bird breeding sanctuary' provided a blueprint for nature conservation which has now been replicated across the UK

#### [RHS](#)

The activities of the RHS are focused on delivering a real benefit to all those involved and interested in horticulture and gardening in the UK

## Appendix 6 – Glossary

**Green Infrastructure:** Green spaces and interconnecting green corridors in urban areas, the countryside in and around towns and rural settlements, and in the wider countryside. It includes natural green spaces colonised by plants and animals and dominated by natural processes and man-made managed green spaces such as areas used for outdoor sport and recreation including public and private open space, allotments, urban parks and designed historic landscapes as well as their many interconnections like footpaths, cycleways, green corridors and waterways.

**SuD:** Sustainable Urban Drainage System are efficient drainage system which seeks to minimise wastage of water, including the use of appropriate groundcover to enable maximum penetration of clean water run-off into the ground and, where appropriate, recycling grey water within the development. Designed to minimise the impact of development on the natural water environment.

**Sustainability:** The effective protection of the environment, including the ability of something to be maintained or to sustain itself, without use of additional natural resources, and without jeopardising the potential for people in the future to meet their needs.

## Appendix 7 – Schedule of consultee comments and Norwich City Council responses

Consultee	Comments	Norwich City Council Response
Norfolk County Council	<ol style="list-style-type: none"> <li>1. This is an excellent comprehensive document and NCC fully supports the City Council in adopting this SPD.</li> <li>2. The proposed Trees and Landscape SPD is comprehensive and reflects current national guidance.</li> <li>3. The document reflects Norfolk County Council practice with regard to Highway tree planting and provides a high level of detail while allowing enough flexibility for adaption for different site conditions.</li> <li>4. In terms of landscape, the document concisely outlines what is required of an applicant and refers to relevant national guidance. There are frequent reference to Norwich City and Joint Core Strategy Policy within which Green Infrastructure (GI) is a specific requirement</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Response noted and welcomed.</b></li> <li>2. <b>Response noted and welcomed.</b></li> <li>3. <b>Response noted and welcomed.</b></li> <li>4. <b>Response noted and welcomed.</b></li> </ol>
Anglian Water	<ol style="list-style-type: none"> <li>1. Tree planting – It is important to provide guidance on tree type and size to ensure the correct type of planting and consideration must be given to the long term impact of planting in close proximity to underground infrastructure. Root damage from maturing trees and shrubs can be a risk to sewers and water mains.</li> <li>2. Sewers for Adoption 6<sup>th</sup> Edition has useful guide lines for planting adjacent to sewers. Briefly, low lying shrubs – no problems, larger hedge type bushes should be 3 metres distance from the pipe; Ash, Oak, Elm type trees 6 metre distance, and Poplar/ Willow type trees 12 metre distance.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>Noted. Text amended accordingly.</b> Officer advice will be given on suitable tree species.</li> <li>2. <b>Noted. No amendment to text.</b> As noted above, Council Tree and Landscape Officers will comment on the suitability of planting specific to individual applications.</li> </ol>





**Report to** Sustainable development panel  
23 March 2016  
**Report of** Head of planning services  
**Subject** Houses in Multiple Occupation - Interim Progress Report

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Item

5

## **Purpose**

This report is to update members on the progress made with issues relating to Houses in Multiple Occupation (HMOs). This interim update report has been produced as requested by members at sustainable development panel on 25 March 2015.

## **Recommendation**

To note the progress made with regard to Houses in Multiple Occupation since March 2015 and that a further report will be made in early 2017.

## **Corporate and service priorities**

The report helps to meet the corporate priority of a healthy city with good housing and the service plan priority to implement the local plan for Norwich.

## **Financial implications**

No direct financial implications

**Wards:** All wards

**Cabinet member:** Councillor Bremner – Environment and sustainable development

## **Contact officers**

Lara Emerson	Planner (policy)	01603 212500
Mike Burrell	Planning team leader (policy)	01603 212529
Graham Nelson	Head of planning services	01603 212530

## **Background documents**

None.

# Report

## Background

1. In planning terms a House in Multiple Occupation (HMO) is a residential dwelling occupied by 3 or more unrelated residents who typically share kitchens, bathrooms and living spaces. HMOs fall into two use classes. If an HMO has 3 to 6 residents, it is classed as a small HMO (use class C4) while an HMO with more than 6 residents is a large HMO (sui generis). Government legislation states that planning permission is not required to change a residential dwelling (use class C3) to a small HMO with 3 to 6 residents (use class C4) and vice versa. However, planning permission is required to change a dwelling or a small HMO to a large HMO with more than 6 residents.
2. In 2011, 7.1 per cent of Norwich's households were in HMOs<sup>1</sup>, but this figure varied significantly across different areas with some areas having as many as 24.9 per cent of their households living in HMOs<sup>2</sup>. 29 per cent of Norwich's HMOs were occupied by students<sup>3</sup>. This data is taken from the 2011 census, in which an HMO is defined as a dwelling shared by more than one household.
3. Concerns have been raised in recent years by a number of residents, particularly in the Nelson ward, about growth in the number of HMOs. The concerns focussed mainly on the loss of housing options for couples and families and on the effects of HMOs on communities (i.e. the number of short-term tenants with less established community ties has grown too large). In 2014, the residents called for planning controls to be introduced to prevent further conversions of dwellings
4. At its meeting on 24 September 2014, the sustainable development panel considered a report and draft options paper on planning for HMOs and potential links to licensing policy. The panel approved the options paper for consultation and a consultation was subsequently held concerning planning policy options for HMOs.
5. The HMO consultation ran from 3 November to 19 December 2014 and had a mixed response. Residents were largely in favour of putting an Article 4 Direction in place to require planning permission to be obtained for the change of use of dwelling houses (Class C3) to small HMOs (Class C4 - up to 6 residents). Some residents wanted to see this Article 4 Direction imposed city-wide whilst others thought that it should be limited to those areas with the highest concentration of HMOs. Landlords and agents were more in favour of positively promoting developments which would reduce the need for the conversion of dwellings to HMOs or of controlling the impacts of HMOs. For a more detailed account of the consultation responses, see the report taken to Sustainable Development Panel on 25 March 2015.
6. It was decided by members at sustainable development panel on 25 March 2015 to:
  - (1) Note that:
    - (a) consultation option 4, promoting the development of accommodation types to reduce demand for conversion of existing housing to HMOs will be taken forward, allowing time to assess housing accreditation and licensing options;
    - (b) progress will be monitored and assessed in 2017, when the need for policy restrictions on new HMOs in wards and areas with high HMO concentrations

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<sup>1</sup> ONS Census 2011

<sup>2</sup> ONS Census 2011

<sup>3</sup> ONS Census 2011

- through an Article 4 Direction and a threshold (an adaption of consultation option 2(a)) will be considered;
- (2) ask the head of planning services to provide an interim report on the progress of 1 (a) and (b) above to the panel in March 2016.

7. This is the interim update report as requested in the second resolution above.

### **Progress update**

8. Both of Norwich's universities have a growing student population. In December 2014, the UEA had a total student population of 13,920<sup>4</sup>. This grew to 14,257 by December 2015<sup>5</sup>. The University of East Anglia's Development Framework Strategy (2010) predicted that student numbers would grow by 1000-2000 from 2010 to 2030 while more recent discussions with senior university staff suggest that the UEA is now expecting a greater influx of students in the next few years<sup>6</sup>. NUA had a smaller student population of around 2,500 in March 2015 but this has increased to around 2,600 in March 2016. Discussions with NUA show that the university expects to grow by another 39-84 in the next 12 months<sup>7</sup>. Those who do not continue to live at home during their studies generally have the option of a) living in student accommodation (either university or privately run); or b) living in privately rented HMOs. HMOs are a popular choice since they are often the cheapest of these options.
9. As agreed by the March 2015 sustainable development panel, a voluntary licensing accreditation scheme for HMOs was launched by the council on 14<sup>th</sup> March 2016. It is not possible to determine the impacts of this scheme yet since it was adopted so recently.
10. Following on from the decision made at sustainable development panel in March 2015, the council has been promoting the development of accommodation types to reduce demand for conversion of existing housing to HMOs. Since 29% of HMOs are occupied by students, an obvious form of development which will help to relieve pressure on the need to provide HMOs is dedicated student accommodation.
11. The UEA and NUA both provide a number of student accommodation blocks. The majority of the UEA accommodation is on the campus and at the neighbouring University Village, with a small amount of accommodation in the city centre. NUA accommodation is in three locations in across the city.
12. The market for purpose-built private student accommodation appears to be expanding rapidly at present. The recent All Saints Green development opened in September 2015 and provides 228 student bed spaces. Planning permission has been granted for 915 bedspaces at the Blackdale Building on the UEA campus and the first phase of 514 beds is nearing completion and is scheduled to be open to students in September 2016. It is understood that the UEA has no immediate plans to build out the second phase of the proposal.
13. A further development for 70 student bed spaces was approved in December for a site at the Earlham West Centre.

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<sup>4</sup> UEA Annual Monitoring Report 2013/14

<sup>5</sup> UEA Annual Monitoring Report 2014/15

<sup>6</sup> University of East Anglia

<sup>7</sup> Norwich University of the Arts

14. Further to the above developments the council is in pre-application discussions with developers for a number of sites where student accommodation is being proposed including a 220-230 bed proposal at the former Mecca Bingo site on All Saints Green which was subject to a pre-application presentation to planning applications committee earlier this month. Collectively, these sites could provide in the region of 1,000 further student bed spaces.
15. The council's private sector housing team has issued 25 HMO licences in the past 12 months. However, this number is not representative of the number of new HMOs for two reasons:
  - (a) Most of these 25 licences will have been issued to landlords re-applying rather than for new HMOs; and,
  - (b) The definition of 'house in multiple occupation' differs considerably between housing legislation and planning legislation. HMOs need a licence if they are 3+ storeys and have 5+ bedrooms. As such, the vast majority of properties which would be considered to be small or large HMOs according to planning will not need a licence.
16. The team also continue to make progress with a system of voluntary accreditation for landlords of HMOs. At the time of writing the accreditation scheme has not been introduced but this is expected to happen before the Panel meets. It is too early to either judge the take up rate of the voluntary accreditation system or the success the scheme will have in raising standards in the sector.
17. There is therefore no reliable information about the number of HMOs existing in Norwich at this time and how this number may have changed since the report of March 2015. However, through council tax records there is information on the number of student only households who are exempt from council tax. This is considered to be a reasonable proxy for the number of student only houses in the private rented sector. These records show that in March 2015 there were 2407 student-only households, and this figure has fallen slightly to 2342 over the 12 months to March 2016. This suggests that the provision of new bed spaces within private student accommodation has kept pace with the increase in student numbers and that any increase in the activity in the buy-to-let sector may be focused on non-student sectors of the market.
18. The Strategic Housing Market Assessment (SHMA) 2015 established that there would be "modest planned growth in student numbers in coming years, mainly in part-time and international students" and with regards to student housing, it concluded that "demand and supply change is likely to be relatively modest and the market unlikely to change significantly".

### **Further information**

19. This year's budget brought in a 3 per cent stamp duty surcharge on buy-to-let properties which has lead to a brief spike in buy-to-let activity as aspiring landlords rush to buy before the surcharge comes into force in April 2016. RICS have been quoted to say that "Over the past three months, we have witnessed a surge in buy-to-let activity... and East Anglia saw the most widespread house price rises in February"<sup>8</sup>. Although there is no information available specifically to the Council about but-to-let activity in Norwich anecdotal information suggests that this spike has been keenly felt in a number of areas of Norwich.
20. The budget also announced that buy-to-let income would be taxed at the same rate as an individual's personal income from 2017. This change will be introduced incrementally

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<sup>8</sup> <http://www.bbc.co.uk/news/business-35764233>



and will have the biggest impact on landlords on higher incomes, but nevertheless it will inevitably make buy-to-let investments less attractive. The impact of this on the buy-to-let and student housing market remains to be seen.

21. Many other university cities have implemented Article 4 Directions to control the conversion of dwellings to HMOs. Article 4 Directions have already been applied to all or part of Oxford (2011), Sheffield (2011), Bath (2013), Chester (2013), Birmingham (2014), Worcester (2014) and Canterbury (2015). This list is not exhaustive.

## **Conclusion**

22. The report taken to sustainable development panel in March 2015 suggested that there may be a decline in student-only HMOs due to the substantial developments of student accommodation and the slow rate of growth in student numbers. However, the report predicted a growth in the number of HMOs occupied by non-students. It concluded that there was insufficient evidence to introduce an article 4 Direction to control the change of use from family housing to HMOs at that point but suggested that the matter be revisited in 2017 once the growth potential of the universities became clearer and the results of the accreditation system became available. This conclusion was influenced particularly by the expectation that pressures for growth in the HMO sector would come from non-students in the coming years and that introducing restrictions on this sector of the market could adversely affect the ability of young professionals and benefit claimants affected by benefit changes of housing themselves.
23. In the light of the information set out in this report it is recommended that the previous approach is maintained. It is considered that by March 2017 the council should be in a far better place to judge what, if any, steps should be taken to control private sector HMOs. The present indications are that notwithstanding the ambitious growth plans of the educational institutions, a strong market for purpose built student accommodation will be able to provide for increased student numbers without unbalancing the housing market any further and that possible measures may limit the housing options of some of the more vulnerable members of society who are reliant on the private sector for their housing.
24. For the next 12 months, it is suggested that the council should continue to implement the current approach of “promoting the development of accommodation types to reduce demand for conversion of existing housing to HMOs”. In 2017, progress will be assessed again and the need for policy restrictions on new HMOs in areas with high HMO concentrations through an Article 4 Direction and a threshold will be considered.



**Report to** Sustainable development panel  
23 March 2016  
**Report of** Head of planning services  
**Subject** Statement of Community Involvement - proposed revision

**Item**  
**6**

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## **Purpose**

This report is about a proposed revision to the city council's Statement of Community Involvement (SCI). The SCI is the council's formal code of practice which describes how people can expect to be involved in the planning process, setting out the standards that will be used to consult people and organisations about planning applications and plan-making. Preparing a Statement of Community Involvement is a statutory requirement under the 2004 Planning and Compulsory Purchase Act.

## **Recommendation**

That members comment on the draft Statement of Community Involvement and recommend that cabinet approves the document for public consultation during June.

## **Corporate and service priorities**

The report helps to meet the corporate priority for a prosperous and vibrant city and a fair city. Although no longer specifically identified as a planning service priority, the preparation of the SCI is a statutory requirement and a specific work priority within the planning policy team plan for 2016-17.

## **Financial implications**

There are no direct financial implications of this report.

**Ward/s:** All wards

**Cabinet member:** Councillor Bremner – Environment and sustainable development

## **Contact officers**

Mike Burrell, planning team leader (policy) 01603 212525

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## **Background documents**

None.

# Report

## Introduction

1. The *Statement of Community Involvement* (SCI) is the city council's code of practice on how people can expect to be involved in the planning process. It sets out how the council will involve the public in plan-making at different stages and for different types of planning document. It also sets the standards that the council's planning service will use when the public are consulted on planning applications for new development. Preparing an SCI is a statutory requirement for local planning authorities under section 18 of the Planning and Compulsory Purchase Act 2004.
2. The draft revised SCI is attached at Appendix 1.

## Why a review is necessary

3. Norwich's current Statement of Community Involvement was adopted in July 2013 and can be found at the following link:

[https://www.norwich.gov.uk/info/20225/planning\\_policies\\_supporting\\_documents/1506/statement\\_of\\_community\\_involvement](https://www.norwich.gov.uk/info/20225/planning_policies_supporting_documents/1506/statement_of_community_involvement)

The 2012-13 review of the SCI was fairly extensive, seeking to respond to a number of major changes in national planning policy, legislation and regulation which streamlined and simplified many aspects of planning and plan-making. The 2013 SCI also took account of improved procedures within the council's own development management service for consulting the public on planning applications and involving people more effectively in decisions about development proposals.

4. The revisions to the SCI document now proposed are generally minor. The current adopted SCI is up to date and in most respects remains fit for purpose to inform the council's procedures for public consultation and engagement for planning. The bulk of the SCI would therefore remain unchanged from the 2013 version. The principal changes result from work being carried out by the city council on the emerging statutory Greater Norwich Local Plan (GNLP) in partnership with Broadland and South Norfolk district councils and Norfolk County Council, as well as ongoing work with other planning authorities in Norfolk on developing the non-statutory Norfolk Strategic Framework (NSF).
5. As part of this process (and to meet the Duty to Cooperate), Norwich and its partner councils preparing the Greater Norwich Local Plan have agreed to:
  - (a) Update their respective Local Development Schemes (LDSs) to incorporate the jointly agreed timetable for preparing the Greater Norwich Local Plan and NSF. Sustainable development panel agreed Norwich's revised Local Development Scheme at its meeting on 24 February 2016, recommending approval by Cabinet. Cabinet approved the revised LDS at its meeting on 9 March in accordance with the panel's recommendation and it came into effect on 10 March 2016. Corresponding LDSs for Broadland and South Norfolk are also now in place
  - (b) Update and align their respective Statements of Community Involvement (SCIs) to ensure a consistent, focused approach to consultation and public engagement on the emerging GNLP and associated documents. South Norfolk and Broadland are

in the process of agreeing their draft revised SCIs for consultation in April, although Norwich's SCI is not proposed to be consulted on until after the May local elections to accord with the requirements of "purdah". The new SCIs for Broadland and South Norfolk have been prepared in close cooperation with Norwich; closely following the format of Norwich's SCI with local variations to allow for plan documents specific to those areas and (for example) to take account of the wider role of parish councils in suburban and rural areas.

6. At a national level, there are also a number of ongoing and anticipated changes to the planning system which may reduce the extent to which the council can involve people in plan making and in decisions on planning proposals. The need for a more focused and streamlined approach to plan-making and for timely and up to date local plans has been signalled repeatedly by government, as part of a drive to speed up development and remove barriers to economic and business growth perceived to be imposed by so-called "red tape" in planning and other regulatory regimes.
7. There is a strong likelihood that financial penalties and other sanctions could be imposed on councils which either do not have local plans in place, fail to bring forward plans quickly enough or fail to review existing plans to keep them up to date. Sanctions are also possible for those councils with a track record of refusing planning permission for new housing developments which are then allowed on appeal. All this means that the city council must strike a careful balance between meeting government expectations for speedy plan-making and decision taking and giving people a meaningful opportunity to comment on and influence emerging plans and proposals.
8. Therefore, in order to meet government directives and ensure that new planning documents for Norwich will be prepared to the timescales set out in the LDS, some of the consultation arrangements for plan-making in the 2013 SCI must be reviewed, particularly to streamline certain procedures and (where this is unavoidably necessary) to shorten the length of time the council consults on key documents including those being prepared for the Greater Norwich Local Plan.
9. Norwich City Council is a signatory of "The Compact", which is a national agreement between the government and community sectors aiming to improve the way that voluntary and community sectors and local councils work together. The Compact can be viewed here:

[http://www.compactvoice.org.uk/sites/default/files/the\\_compact.pdf](http://www.compactvoice.org.uk/sites/default/files/the_compact.pdf)

The proposed revised SCI follows the principles of the Compact (as did the 2013 version) although where shorter timescales for consultation are proposed than the minimum 12 week period specified in the Compact, the reasons for this need to be clearly set out and justified. Paragraphs 43 to 46 of the SCI document set out the revised timescales for plan-making and the reasoning for the revised approach.

10. As previously, the SCI document indicates how it will interpret various parts of the council's Community Engagement Strategy, adopted in 2009, and how it relates to the current Corporate Plan.



## Key changes from the 2013 SCI

### *Plan making*

11. The new SCI document incorporates additional commentary in relation to plan-making, describing the most recent national policy changes and in particular the government's requirements to speed up and streamline the local plan process. It updates the local context for plan-making with reference to the most recently adopted (2014) local plan for Norwich City, the emerging Greater Norwich Local Plan and Norfolk Strategic Framework, the Duty to Cooperate and the new joint planning and governance arrangements under the Greater Norwich Growth Board (GNGB), which have been introduced since the last SCI was adopted.
12. There are a number of changes to the minimum **consultation periods** for key planning documents which are necessary in response to the more rigorous timeframes for plan preparation. These can be summarised as:
  - (a) Ensuring that planning policy documents are consulted on for at least the statutory minimum period in all cases (that is, six weeks for development plan documents and neighbourhood plans; four weeks for supplementary planning documents);
  - (b) No longer requiring an automatic two-week extension of the statutory minimum consultation period whenever a consultation overlaps with holiday periods irrespective of the length of the overlap. Instead, a more flexible and pragmatic approach is proposed, extending consultations by an appropriate number of days dependent on when consultation periods will fall in relation to the holiday.
  - (c) No longer requiring an automatic 12-week consultation period for any document not included in the published Local Development Scheme. The expectation is that Local Development Schemes would be reviewed regularly to ensure that any requirements for new policy documents are captured and publicised well in advance, as well as noting them in published Annual Monitoring Reports.
  - (d) Clarifying the arrangements for consultation on informal policy documents and advice notes and on future reviews of the SCI itself, and making clear that consultations will not normally be undertaken in the run up to local elections ("purdah").
13. The proposed revised consultation periods are set out in the table following paragraph 48 of the SCI document. In relation to statutory planning documents, the same periods will be specified in the corresponding SCI documents being prepared for Broadland and South Norfolk.
14. A new table is added at the end of Section 2 detailing the statutory stages of council publicity for **Neighbourhood Plans** prepared by the community. This is to clarify the statutory process should any neighbourhood plans be taken forward in Norwich in future (there are none currently). The table is consistent with corresponding ones included in the SCIs for Broadland and South Norfolk, both of which have a number of neighbourhood plans already in place.

### *Planning applications*

15. The SCI document, as previously, sets out the standards for consulting on planning applications and specifically the requirement for developers to undertake their own

pre-application consultations on major schemes. The section provides a general overview and is largely unchanged from the 2013 SCI except in relation to matters of detail. The SCI will not contain full details of current planning service standards and pre application advice fees since these may be subject to further amendment over the SCI period. Links are instead provided to the relevant planning service web pages, whose content will be updated as necessary.

16. A review of planning pre-application advice service standards, consultation processes and charging levels has recently been undertaken and a number of changes were agreed by cabinet on 9 March. They will take effect in April.

### **Consulting on the revised document**

17. Subject to agreement by the panel and approval by cabinet, it is proposed to consult on the draft revised SCI for six weeks (consistent with timescales in the Local Development Scheme) commencing in June 2016.

### **Conclusions**

18. The revised Statement of Community Involvement as now proposed would be broadly unchanged from the 2013 version. It provides a clear framework for effective public engagement in the planning process to ensure timely production of the Greater Norwich Local Plan and supporting documents and ensure that well planned, sustainable development can be delivered for the city.
19. The government's continued drive to simplify and streamline the planning system (and the prospect of sanctions for councils perceived to be delaying their local plans or not determining planning applications quickly enough) means that it may not always be possible to involve local people in the planning process to the extent that we would like. This is especially so in the case of the many categories of development that no longer need planning permission at all, or where the statutory requirements for public consultation have been reduced. For that reason, it has been necessary in a small number of cases to propose a reduction in the length of time we consult on key documents compared with the timescales set out in the current SCI.
20. It is clear that a careful balance must be struck between speedy and efficient plan making and decision taking and the need for communities in Norwich to have a meaningful opportunity to comment on and influence development decisions that will affect them. The SCI demonstrates the council's continuing commitment to involve the community to the widest practical extent in local plan production and in the decision making process for planning applications.



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# 1. Introduction

## Why we are preparing the Statement of community involvement

1. The city council is always looking for ways for the community to become more involved in its plan making and decision taking. We want to encourage more people to be involved and to make that as easy as possible. We hope that your local knowledge will help to make sure that development in the city benefits everyone whilst protecting the special qualities of the city. How we will ensure that you are part of this process is set out in this statement.
2. Under Section 18 of the Planning and Compulsory Purchase Act 2004, all local planning authorities in England and Wales must prepare a Statement of community involvement (SCI) and must carry out planning consultations in accordance with it. The SCI is a 'code of practice' setting out how the council intends to involve people in planning decisions. This can include both decisions about planning policy (plan-making) and decisions on planning applications.
3. This is the fourth edition of the Statement of community involvement. It replaces the version published in July 2013.

## Need for review

4. Under the national planning system, the council must prepare a *local plan*, which will guide the city's development and growth over the next 15 to 20 years. With an up to date local plan in place, it is clear how the council intends to provide for new housing and employment in the city, how much development will be planned for and where it will go. A local plan also sets out clearly what will and what will not be allowed in certain areas and which areas must be protected from development altogether. Local plans must be reviewed regularly to remain up to date and respond to changes in local circumstances. Plans must also be consistent with national planning policy and guidance. If this guidance changes, local planning policy usually needs to change too.
5. Since we published the last Statement of community involvement in 2013, there have been a number of important changes to the national planning system which will affect how we prepare and consult on plans and proposals in future. Further changes in national rules are expected in coming years, particularly as a result of measures announced in the forthcoming Housing and Planning Act.
6. In relation to **plan-making**, the government has made it clear that it expects councils to prepare local plans and put them in place as quickly as possible. Recent government announcements suggest that councils which do not already have up to date local plans will be expected to prepare and *adopt* them (that is, complete the legal process to bring them into force) by the end of 2017. Councils which fail to produce timely local plans might also face possible sanctions and financial penalties. Councils that have adopted their plans recently must keep



them up to date and review them as soon as practicable. There will also be an increased role for neighbourhood plans prepared directly by local communities.

7. Although Norwich's main local plan documents were adopted as recently as December 2014, the overall planning strategy for the Norwich area, the *Joint core strategy* for Broadland, Norwich and South Norfolk, is becoming out of date and a new local plan needs to be prepared to manage and shape longer term growth and development. At the same time, there is a need for an overall planning framework to establish future needs and set targets for housing and jobs in Norfolk and ensure that new local plans for individual districts are consistent with those targets.
8. Accordingly, in partnership with Broadland and South Norfolk Councils and Norfolk county council, we are starting work on a new *Greater Norwich Local Plan* that will set out a development strategy for the wider Norwich area between now and 2036, as well as a broader *Norfolk Strategic Framework* to set overall planning targets.
9. In relation to **planning applications**, the government has made further changes in national planning rules which mean that more kinds of development can be carried out and more kinds of premises can change their use without planning permission – called *permitted development*. As part of the drive to encourage more housebuilding, the government will also be changing and simplifying the planning process for housing, granting automatic “permission in principle” for new housing development on previously developed sites which councils have listed as suitable. Local plans will also have to identify land for low cost starter homes on all suitable housing development sites.
10. During this period of rapid change, we must strike a careful balance between meeting our obligations to government to prepare plans and decide applications as quickly as possible, and making sure that local people still have a meaningful opportunity to comment on and influence planning policies and proposals. In order to meet government directives we will need to review some of the consultation arrangements for plan-making in the 2013 Statement of Community Involvement, particularly to streamline certain procedures and (where this is unavoidably necessary) to reduce the length of time we consult on key documents.
11. Taken together, the changes in the planning system will inevitably affect the way that local plans are prepared and how planning applications are made and dealt with. This means that the way we involve local people in the planning process also needs to change. In cases where no planning application is needed, the city council cannot always let people know about all development which is happening in their area. In a very small number of cases, the national rules have been tightened, for example changing a shop to a betting shop now needs permission where it did not before, as does changing the use of or demolishing a local pub which is registered as an Asset of Community Value. The permitted development

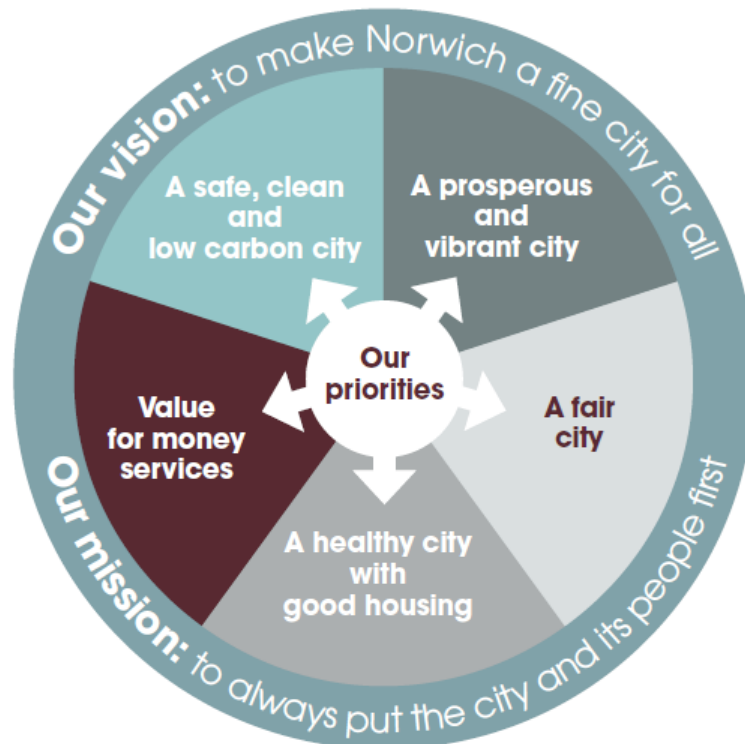
rule changes are designed to speed up the planning process, get development going and make smaller scale building projects and minor changes easier. But they will sometimes mean that local people will have less opportunity than before to have their say.

### **Planning and community Involvement**

12. The council produced a [Community engagement strategy](#) (CES) in 2009 outlining the council-wide approach to community involvement. The Statement of community involvement shows how this approach will be applied to plan making and decision making on planning applications.
13. The Council developed the Community engagement strategy to support the overall citywide vision and objectives in its corporate plan. The priorities within the latest corporate plan (2015-2020) are shown in Figure 1 on page 4.



## Council priorities



### Our core values

Everything we ever do as an organisation, whether in teams or as individuals, will be done with our core values in mind. These are:

- P Pride.** We will take pride in what we do and demonstrate integrity in how we do it.
- A Accountability.** We will take responsibility, do what we say we will do and see things through.
- C Collaboration.** We will work with others and help others to succeed.
- E Excellence.** We will strive to do things well and look for ways to innovate and improve.

**Figure 1:** Extract from the Corporate Plan 2015-2020 (Norwich City Council)

14. In order to achieve the council's vision and priorities through the planning service, it is essential that there is effective public involvement in plan-making and decision making on planning applications and that clear standards are set for when and how involvement will take place.

### The Compact: Code of practice on involvement

15. Norwich City Council is a signatory of The Compact. The Compact is a national agreement between the government and community sectors, which aims to improve the way voluntary and community sectors, and local councils involve each other, including involvement in the planning process. We will continue to provide a positive framework for productive working relationships and will ensure that the guidelines set out in the Compact are met where possible. In

some circumstances it may be necessary to depart from the Compact should new legislation change the regulations for involvement of others in plan-making and planning applications, or if full compliance with the compact is likely to result in penalties or sanctions for the Council through failure to meet prescribed Government targets for plan-making or decision-taking.

16. Further details on consultation arrangements for planning policy are provided in section 2 – Consultation on planning policy documents. Consultation arrangements for development management are provided in section 3 – Consultations on planning applications.

### **The Council's commitment to equality**

17. The council has a commitment to equality which is a statutory duty under the Equality Act (2010). This is particularly relevant to planning which has a role to play in promoting equality of opportunity and cohesion by considering the needs of the community. The council recognises that equality of opportunity in practice includes ensuring that vulnerable or disadvantaged groups have their voices heard and their needs considered. This statement supports that objective through providing guidance on how to get people involved. The impact of planning activities and decisions will be assessed in order to ensure that there are no unintended negative impacts on vulnerable or disadvantaged groups. The assessments will focus on the six protected characteristics of race, gender, disability, age, sexual orientation and religion or belief, but will also consider the wider implications of socio-economic inequalities on community cohesion. This is normally carried out through an Equality Impact Assessment (EqIA) which takes place at the beginning of the plan-making process.

### **The role of councillors**

18. Councillors have three roles: as decision makers, as community representatives and as communicators to exchange and share information and discuss the issues and concerns of local electors with council officers and other stakeholders. Members of the public can make their views known to ward councillors, the relevant council executive member/portfolio holder, or at planning applications committee in a number of ways; by letter, email, or face-to-face discussion. However, it is important that the consultation process is used because this is how views are registered in the plan-making or planning application process. This ensures that while councillors hear what you have to say, you will not miss the opportunity to be heard at committees or at any subsequent appeal, inquiry, hearing or examination.

### **RTPI Planning Aid England**

19. The Royal Town Planning Institute (RTPI) Planning Aid England offers assistance and advice on the planning system to individuals and groups who are unable to pay for independent professional planning advice. Planning Aid encourages people to get involved in the planning system to help shape their own environment. The council supports the work of Planning Aid and will work with

the service to provide independent advice for some of the involvement procedures proposed in this document.

20. RTPI Planning Aid England can be contacted via planning aid advice line:

Tel: 0330 123 9244

Email: [advice@planningaid.rtpi.org.uk](mailto:advice@planningaid.rtpi.org.uk)

Web: [www.rtpi.org.uk/planning-aid](http://www.rtpi.org.uk/planning-aid)

## 2. Consultations on planning policy documents

### National policy requirements

21. National planning policy makes clear that local planning authorities must seek the views of communities and other stakeholders from an early stage in the plan-making process, stating:

*'Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.'*

National Planning Policy Framework (NPPF), 2012; para 155.

22. The Localism Act 2011 has made a range of new powers available to communities across the country to enable them to play a greater part in planning for their future. One of these powers is neighbourhood planning, which we discuss in more detail later in this SCI. The Localism Act also introduced a Duty to Cooperate which is a legal duty on local planning authorities, county councils and public bodies to *engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters*. In simple terms, this means that councils cannot plan for new development within their areas in isolation, but must make sure that neighbouring councils and other organisations which provide services across larger areas participate fully in plan-making to ensure a co-ordinated, strategic approach to development and growth across administrative boundaries.

### What kinds of documents are consulted on?

23. **Development plan documents** or DPDs (now more usually called "local plans") are the formal policy documents which make up the statutory development plan for Norwich. Once adopted, these have full legal weight in decision making. The council's decisions to approve or refuse any development which needs planning permission must be made in accordance with the policies in the development plan, unless material considerations indicate otherwise.
24. **Supplementary planning documents** (SPD) help to support and explain in more detail how the city council will implement particular policies and proposals in the local plan. SPD can also take the form of master plans, detailed design briefs or development briefs for sites identified for future development ("allocated") in the plan, as well as for other emerging sites. SPD can be reviewed frequently and relatively straightforwardly to respond to change, whereas a review of the policies in the plan is a longer and more complex process.



25. The planning policy documents to be prepared by the council are identified in the Local development scheme (LDS). The LDS includes a timetable of when we aim to produce the documents, and the various stages they must go through to be adopted. The LDS is available on the Council's website and is reviewed and updated regularly (hard copies are available on request):  
[https://www.norwich.gov.uk/downloads/file/1671/local\\_development\\_scheme](https://www.norwich.gov.uk/downloads/file/1671/local_development_scheme)

### The current local plan

26. The currently adopted development plan (the local plan) for Norwich comprises the **Joint Core Strategy for Broadland, Norwich and South Norfolk** (the JCS) adopted in March 2011, amendments adopted January 2014; the **Norwich Site Allocations and Site Specific Policies Local Plan** (the Site Allocations Plan), adopted December 2014; the **Norwich Development Management Policies Local Plan** (the DM Policies Plan), adopted December 2014; and the **Northern city centre area action plan** (NCCAAP) for part of Norwich city centre, adopted March 2010. The NCCAAP runs only to March 2016 and will expire during the currency of this Statement of Community Involvement. The JCS will be replaced by the emerging Greater Norwich Local Plan (GNLP), which is scheduled to be adopted in 2020.
27. The table in **figure 2** shows the relationship between these documents, as well as the supplementary planning documents which are already in place to support their policies. More details of supplementary planning documents the council intends to prepare in future are in the LDS. Both the LDS and this Statement of community involvement (SCI) are procedural documents that support the production of the local plan setting out what will be produced and explaining how people can get involved with the process.

### The emerging local plan

28. The proposed **Greater Norwich Local Plan** (GNLP) will be a new statutory local plan for Broadland, Norwich and South Norfolk to update the present Joint Core Strategy (JCS). This will, similarly, set out a statement of strategic planning policy for the wider Norwich area but, unlike the present JCS, will also include policies and proposals for individual sites. As such, the GNLP will eventually also replace separate site allocations plans for individual districts. It is the only formal Development Plan Document in the current Local Development Scheme programme.
29. The proposed **Norfolk Strategic Framework** (NSF) will be a non-statutory strategic policy statement which will set broad strategic targets and priorities for the next round of statutory local plans for individual local planning authorities in Norfolk, facilitating joint working across district boundaries and helping to fulfil the statutory Duty to Co-operate.

30. Both the above documents will cover the period to 2036. The work programme for the preparation of the GNLP and NSF is set out in the latest revision of the Norwich Local Development Scheme which was published in March 2016. The programme is subject to review dependent on the extent of evidence likely to be required.

### **Procedural Requirements**

31. Local plan documents must be prepared in accordance with a nationally prescribed procedure set out in the national Local Planning Regulations for England, which were last reviewed in 2012. This procedure will be followed in preparing the Greater Norwich Local Plan, but a more streamlined and fast-track process will be used for the Norfolk Strategic Framework, as this is not a local plan but an evidence framework to inform other plans.

32. At key stages of plan-making there is an opportunity for the public to comment on emerging planning policies and proposals in the documents. At the end of the process, development plan documents must be submitted to the Secretary of State and be independently examined by a government appointed inspector to assess their soundness and legal compliance before they can be *adopted* by the city council and come into force.

33. Certain other documents must be published alongside each DPD, including:

- the independently prepared *sustainability appraisal (SA) report* of the DPD at each stage (a *sustainability appraisal scoping report* is prepared and consulted on at the start of the process to set out what sustainability issues and objectives the SA should cover and what evidence it will use);
- a policies map, setting out the DPD's policies and proposals on a map base (if relevant);
- a statement of consultation summarising public representations made to the plan and how they have been addressed (called the "Regulation 22(c) statement");
- copies of any representations made;
- any other supporting documents considered by the council to be relevant in preparing the plan;
- an adoption statement and environmental statement (when the plan is adopted).

34. The local plan is supported by a range of research reports, studies and topic papers making up a detailed evidence base which informs and justifies its policies.

### **Meeting the Duty to Cooperate**

35. For many years Norwich City Council has worked in close cooperation with its neighbouring councils Broadland and South Norfolk to plan for and deliver major growth envisaged for the Norwich Policy Area. This work was first undertaken as part of a formal Greater Norwich Development Partnership (GNDP), whose responsibilities have since been inherited by its successor the Greater Norwich Growth Board (GNGB). The Joint Core Strategy for Broadland, Norwich and South Norfolk was produced by the GNDP, which includes the Broads Authority and Norfolk County Council working in partnership with the three districts. Other documents produced by the GNDP include the Community Infrastructure Levy (CIL) Charging Schedule for each district/authority area. The Community Infrastructure Levy is a statutory charge on new development introduced by the CIL Regulations 2010. It came into force in Norwich in 2013.
36. As noted above, the need for councils and other agencies to work together in developing effective planning strategies for their areas is now a legal duty. Councils must show that they have met this statutory *Duty to Cooperate* in order for local plans to be accepted (found “sound” and “legally compliant”) when those plans are independently examined by government. Work on preparing the overall Norfolk Strategic Framework – although it will not be a formal local plan – will involve the city council in joint working with all the local planning authorities and other relevant bodies across Norfolk.
37. The planning policy documents which have been (and will be) prepared jointly by the Norwich area authorities are set out in the respective Local Development Schemes for each authority. Public involvement in their preparation is guided by the community involvement standards as set by the partnership councils jointly in their respective statements of community involvement. For the current round of joint local plan preparation, consultation standards and consultation periods will be common across the three local authority areas and all the participating authorities will work to the same consultation timeframes for key documents in their SCIs.

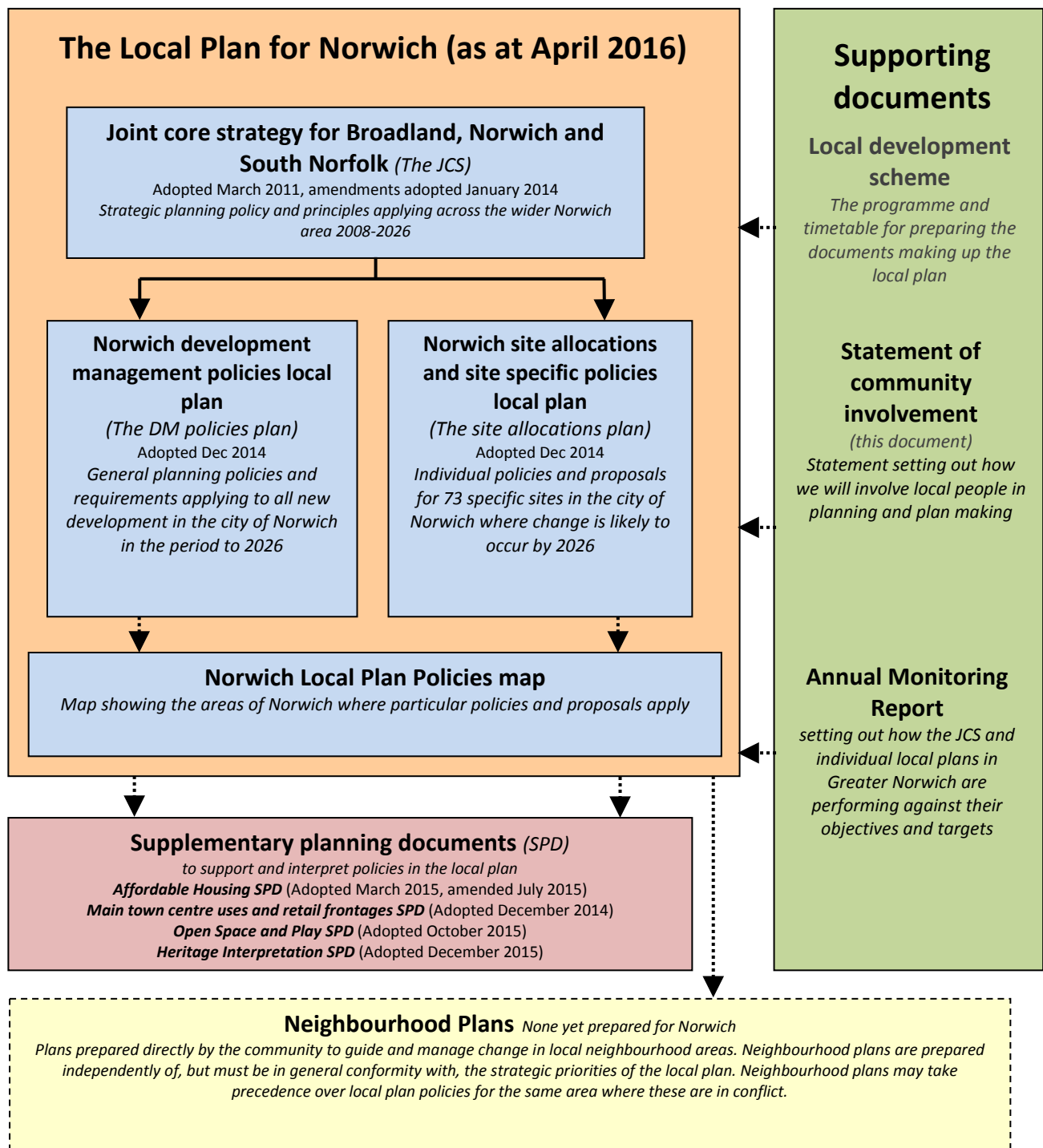


Figure 2: Documents making up the adopted local plan

## Consultation Methods

38. The council has a well established procedure for involving people in plan-making. We will continue to develop our understanding of different consultation techniques over time and learn from what works, and what doesn't. A variety of methods have and will be used during consultations, taking into consideration issues being consulted on and the needs of the audience. These include the use of appropriate locations, and/or the use of particular presentation media for presentations to blind people, people with impaired hearing, and people with mental health issues or learning difficulties.

39. Consultation is carried out increasingly by electronic means but is still rapidly evolving in the digital age. Although almost all the documents we consult on are made available electronically, the challenge remains as to how information can be publicised effectively to attract the widest audience. The council is steadily expanding the use of interactive web technology to enable direct access to its services across a range of devices and allow local people to make payments, submit comments and report issues and problems direct via online forms. We will endeavour in future planning consultations to integrate these mechanisms where possible and extend the use of social media to help access "hard to reach" groups, especially younger people. We will also continue to use more traditional methods of consultation to include those without access to the internet or social media.

40. Based on our current success and lessons learned from previous consultations, we will endeavour to use a range of consultation approaches, as necessary, set out in the following list:

- Letters/emails to groups and individuals
- newspapers and Citizen magazine
- paper documents
- council's website
- "planning for real"<sup>1</sup> type events
- presentations to community groups
- public meetings
- focus groups
- exhibitions
- local councillors
- social media
- local radio



41. We acknowledge that it is important to make public consultation arrangements as extensive as possible to make sure the public can get their voice heard. However, it is not always possible or appropriate to consult using all the methods

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<sup>1</sup> "Planning for Real" is a nationally recognised planning process where residents take a hands-on role in registering their views, identifying priorities and suggesting solutions for development in their area using 3D models, plans and maps. Sessions are usually facilitated by an independent organisation such as Planning Aid England.

listed above. We will make sure that consultations are tailored appropriately to the kind of plan, policy or proposal being consulted on and the stages it has reached. We will ensure that people with no access to the internet, email, text or social media are kept informed by traditional, non-electronic means.

### How long will consultations last?

42. At all consultation stages the Council will comply with the minimum legal requirements. The National Compact (see paragraph 15 above) states that local authorities should “...where it is appropriate, and enables meaningful engagement, conduct 12-week formal written consultations, with clear explanations and rationale for short timeframes or a more informal approach.”

43. In most circumstances a 12 week consultation period will not be needed to respond to emerging plans and policies. This is because

- In future, the need to expedite the production of statutory local plans to meet more rigorously enforced **government targets** for speedy plan-making and timely review mean that an extended period of public consultation may not always be achievable within the timeframes available. In these circumstances the reasons for reducing the consultation timescale will be clearly set out.
- the council’s programme for preparing planning policy documents must be set out in the statutory **Local Development Scheme (LDS)** and this gives details of forthcoming documents and expected timescales well in advance;
- The council’s **forward agenda** gives advance notice of documents which will be considered by council committees.

44. The following timescales will be adhered to for documents consulted on:

Document type	Normal period for consultation	Circumstances in which the consultation period will be extended
Development plan documents (DPDs)	We will consult for at least the minimum statutory period of <b>six weeks</b> (42 calendar days) on DPDs	We will ensure wherever possible that consultation periods are not timed to coincide with the Christmas, Easter, or summer holiday periods. Where this is unavoidable, we will extend consultation to allow for extra days where a bank holiday occurs in the period.  Where a normal period of consultation would take in all or part of the Christmas/New Year holiday, the Easter holiday or the July/August
Neighbourhood development plans (“Neighbourhood plans”)	We will consult for at least the minimum statutory period of <b>six weeks</b> (42 calendar days) when proposals for neighbourhood plans prepared by designated neighbourhood planning bodies are published.	



Document type	Normal period for consultation	Circumstances in which the consultation period will be extended
Future reviews of this Statement of Community Involvement (SCI).	We will consult for at least <b>six weeks</b> (42 calendar days) on any future reviews of this SCI.	summer holiday period, extra days will be added to compensate for this, up to a maximum of 14 calendar days over and above the statutory minimum.
Supplementary planning documents (SPD) including planning briefs.	We will consult for at least the minimum statutory period of <b>four weeks</b> (28 calendar days) on SPD and on planning briefs which have the status of SPD.	At its discretion, and only in the early, informal stages of DPD/SPD production, the Council may allow additional time for representations to be made in circumstances where there is a justifiable reason for not responding within the deadline.
Non-statutory planning documents and informal advice notes.	We will consult for a period appropriate to the coverage and content of the document concerned.	In accordance with the Code of Recommended Practice on Local Authority Publicity, we will not normally run consultations on planning documents in the six week period immediately before local council elections. ("Purdah").

45. For supplementary planning documents (SPD) and planning briefs, the Local Development Regulations specify a minimum four week consultation period, although the period for legal challenge after adoption is longer than it is for DPDs. Because supplementary planning documents typically relate to small geographical areas or subjects of specialist interest, shorter consultation periods are justified, particularly as similar lead-in times and reporting arrangements exist for SPD as they do for development plan documents.

46. For neighbourhood plans a separate period of public consultation by the neighbourhood planning body proposing the plan is required before a draft plan can be formally submitted to and accepted by the council. Although at the time of writing no neighbourhood plans have been prepared or proposed in Norwich, the

### Who will we involve, and how?

47. The Council's Community engagement strategy (CES) "Working Better Together" identifies five levels of involvement:

- Keeping you informed;
- Asking what you think;
- Deciding together;
- Acting together, and;
- Supporting independent community initiatives.

48. Different types of policy documents need different levels of involvement, depending on factors such as how many people would be affected by the proposed policy and the type of impact it would have. Detailed guidance on who we will involve, how, and at what level at the various stages of the plan making process is given in the tables on the following pages.

### Public involvement in Local Plans (Development plan documents)

Key stages	Involvement Level	Public/stakeholder involvement arrangements
<b>1. Pre-production/evidence gathering</b> The information needed for the plan is prepared and potential issues identified.	<ul style="list-style-type: none"> <li>• Asking you what you think</li> <li>• Deciding together</li> </ul>	<ul style="list-style-type: none"> <li>• Writing to statutory environment bodies to initiate Sustainability appraisal screening</li> <li>• Early involvement of relevant stakeholders</li> <li>• Hold focus group sessions where necessary to help decide issues to be included in the plan</li> </ul>
<b>2. Draft Local plan</b> The information gathered at first stage is taken into account in the drafting of detailed policies and allocations. Depending on the level of complexity, the draft local plan stage may involve more than one period of consultation.	<ul style="list-style-type: none"> <li>• Asking you what you think</li> </ul>	<ul style="list-style-type: none"> <li>• Publish draft documents for consultation for a minimum of <b>six weeks</b>, and, at the start of the consultation period,                             <ul style="list-style-type: none"> <li>▪ publish the Sustainability scoping report or appraisal as appropriate;</li> <li>▪ inform specific consultation bodies (this will be done by email where possible: postal mailing will be used where there is no email address on the database);</li> <li>▪ inform relevant consultation bodies , other interested bodies and individuals on the consultation database, as above;</li> <li>▪ publish electronic copies of the consultation documents on the Council's website;</li> <li>▪ make hard copies of consultation documents available for inspection at the Council's office and the Millennium library;</li> <li>▪ issue press release in local papers;</li> <li>▪ add consultation information on Council's social media sites.</li> </ul> </li> <li>• Arrange public meetings, exhibitions, focus groups as appropriate</li> </ul>
<b>3. Publication of the Local plan</b> The Local plan is finalised and published for a last stage of consultation. Comments at this stage will only be sought on soundness and legal compliance of the plan.	<ul style="list-style-type: none"> <li>• Asking you what you think</li> </ul>	<ul style="list-style-type: none"> <li>• Publish the Local plan and relevant documents for consultation for a minimum of <b>six weeks</b>, and, at the start of the consultation period,                             <ul style="list-style-type: none"> <li>▪ publish a statement of the representations procedure;</li> <li>▪ publish the Sustainability appraisal report for consultation;</li> <li>▪ publish a consultation statement summarising all comments received from the previous stages and how the comments have been considered and taken into account;</li> <li>▪ publish relevant supporting documents;</li> <li>▪ inform specific consultation bodies, as above;</li> <li>▪ inform relevant general consultation bodies , other interested bodies and individuals on the</li> </ul> </li> </ul>

Key stages	Involvement Level	Public/stakeholder involvement arrangements
		<p>consultation database, as above;</p> <ul style="list-style-type: none"> <li>▪ publish electronic copies of all the documents on the Council's website;</li> <li>▪ make hard copies available for inspection at the Council's office and the Millennium library;</li> <li>▪ issue public notice in local newspapers;</li> <li>▪ issue press release in local newspapers;</li> <li>▪ add consultation information on Council's social media sites.</li> </ul> <p>• Arrange exhibition or presentation to interest groups if necessary</p>
<b>4. Submission</b>	<ul style="list-style-type: none"> <li>• No involvement</li> </ul>	The draft Local plan, and all supporting documents and the comments received from public consultation are submitted to the Secretary of State, who appoints an independent planning inspector. The hard copy documents are made available at Council's offices and the Millennium library.
<b>5. Public examination</b>	<ul style="list-style-type: none"> <li>• No involvement</li> </ul>	The Local plan and the comments received are examined by the planning inspector, followed by the inspector's report.
<b>6. Adoption</b> The Local plan is adopted following the consideration of the recommendations in the inspector's report.	<ul style="list-style-type: none"> <li>• Keeping you informed</li> </ul>	<ul style="list-style-type: none"> <li>• Make the inspector's report available for inspection on the Council's website and at the Council's office</li> <li>• Inform consultees who previously made representations about the availability of inspectors report</li> </ul> <p>Following adoption of the Local plan, we will:</p> <ul style="list-style-type: none"> <li>• Publish the Local plan, make electronic copies available on the Council's website and hard copies available at the Council's office</li> <li>• Publish adoption statement in Local newspapers</li> <li>• Send adoption statement to specific and general consultees and those who made representations at previous stages or those who have asked to be notified of the adoption</li> <li>• Make the Sustainability appraisal and other supporting documents available for inspection for six weeks after adoption</li> <li>• provide information about the adoption of the plan on Council's social media sites</li> </ul>

### Public involvement in Supplementary Planning Documents (SPDs) and planning briefs

Key stages	Involvement Level	Public/stakeholder involvement arrangements
<b>1. Pre-production/evidence gathering</b> The information needed for the plan needs to be prepared and potential issues need to be identified.	<ul style="list-style-type: none"> <li>Asking you what you think</li> <li>Deciding together</li> </ul>	<ul style="list-style-type: none"> <li>Engaging relevant stakeholders in deciding the level of detail to be included in the plan and to identify key issues that need to be addressed</li> <li>Where necessary, preliminary consultations will be carried out prior to the publication of draft SPDs</li> </ul>
<b>2. Draft SPDs/ Planning briefs</b> A Draft SPD/planning brief is prepared following the initial evidence gathering stage. Consultations at this stage will involve publishing a draft of the SPD/ planning brief for comment.	<ul style="list-style-type: none"> <li>Asking you what you think</li> </ul>	<ul style="list-style-type: none"> <li>Publish the Draft SPD/planning brief for consultation for a minimum of <b>four weeks</b>, and, at the start of the consultation period,                             <ul style="list-style-type: none"> <li>make electronic copies of the plan and supporting documents available on the Council's website;</li> <li>make hard copies of the plan and supporting documents available at the Council's office and Millennium library for inspection;</li> <li>inform relevant specific and general consultees and those on the consultation database who may have an interest on the issues (this will be done by email where possible: postal mailing will be used where there is no email address on the database);</li> <li>issue a press release for the matters concerned if appropriate;</li> <li>provide consultation information on Council's social media sites.</li> </ul> </li> <li>Arrange exhibition or presentation to interest groups if appropriate</li> </ul>
<b>3. Adoption</b> The Council will consider the representations received through the consultations and make any amendments necessary before adopting the SPD/ planning brief.	<ul style="list-style-type: none"> <li>Keeping you informed</li> </ul>	<ul style="list-style-type: none"> <li>Publish the SPD/planning brief – make electronic copies and any supporting documents available on the Council's website and hard copies available at Council's office</li> <li>Publish a consultation statement summarising all comments received from the previous stages and how the comments were considered and taken into account</li> <li>Send an adoption statement to those who have made representations during the previous consultations and those who have asked to be notified of the adoption of the SPD/planning brief.</li> <li>provide information on Council's social media sites</li> </ul>

## Publicising Neighbourhood Plans

Neighbourhood plans are prepared independently by the local community. As such, deciding how to involve people about what should be in a neighbourhood plan and determining what issues it will cover is the role of the neighbourhood forum or other designated body<sup>2</sup> actually proposing the plan. The council does not itself have a direct role in preparing a neighbourhood plan but must provide technical advice and support to any group proposing one, to ensure that it will be broadly consistent with the existing development plan for the area. The council is only required to consult formally at key stages, following the legal procedures as described below. The neighbourhood planning body must abide by the neighbourhood planning regulations and must consult “meaningfully” about a proposed plan, but is not bound by this Statement of Community Involvement.

Key stages	Involvement Level	Public/stakeholder involvement arrangements
<b>1. Neighbourhood Area Application</b> A neighbourhood forum or other prospective neighbourhood planning body applies to the city council to designate a Neighbourhood Area for which they propose to prepare a Neighbourhood Plan. The city council publicises the application and invites representations over a minimum 6 week period.	<ul style="list-style-type: none"> <li>• Keeping you informed</li> <li>• Asking you what you think</li> <li>• Supporting independent community initiatives.</li> </ul>	Publish the Neighbourhood Area proposal and invite representations for a minimum of six weeks, and, at the start of the period, <ul style="list-style-type: none"> <li>• make electronic copies of the proposal documentation available on the Council’s website;</li> <li>• make hard copies of the proposal documentation available at the Council’s office and Millennium library for inspection;</li> <li>• inform relevant specific and general consultees and those on the consultation database who may have an interest in the proposal (this will be done by email where possible: postal mailing will be used where there is no email address on the database);</li> <li>• issue a press release relating to the proposal if appropriate;</li> <li>• add information about how to respond to the proposal on the Council’s social media sites.</li> </ul>

<sup>2</sup> In areas without a parish or town council (such as Norwich), local people will need to decide which organisation should produce a neighbourhood plan. These can be existing community groups or local people forming a new group. In both cases they will need to be formally designated and must meet the basic conditions set out in the Localism Act. This includes having at least 21 members and being established to promote the wellbeing of the neighbourhood area. It must be open to new members and have a written constitution and have taken reasonable steps to secure membership from residents, business and local elected members across the neighbourhood area.



Key stages	Involvement Level	Public/stakeholder involvement arrangements
<b>2. Submission of a Neighbourhood Plan</b> The neighbourhood forum submits the Neighbourhood Plan to the city council. The council invites representations on the submitted plan over a minimum 6 week period.	<ul style="list-style-type: none"> <li>• Keeping you informed</li> <li>• Asking you what you think</li> <li>• Supporting independent community initiatives.</li> </ul>	Publish the submitted plan and invite representations for a minimum of six weeks, and, at the start of the period, <ul style="list-style-type: none"> <li>• make electronic copies of the submitted plan available on the Council's website;</li> <li>• make hard copies of the submitted plan available at the Council's office and Millennium library for inspection;</li> <li>• inform relevant specific and general consultees and those on the consultation database, as above;</li> <li>• issue a press release relating to the Neighbourhood Plan if appropriate;</li> <li>• provide information about how to respond to the plan on the Council's social media sites.</li> </ul>
<b>3. Publication of examiners report</b> The city council publishes the report of the examination into the submitted Neighbourhood Plan and the decision of the council as to whether or not it accepts the examiner's recommendations.	<ul style="list-style-type: none"> <li>• Keeping you informed</li> </ul>	<ul style="list-style-type: none"> <li>• make electronic copies of the examiner's report and decision statement available on the Council's website;</li> <li>• make hard copies of the examiner's report and decision statement available at the Council's office and Millennium library for inspection;</li> <li>• inform relevant specific and general consultees and those on the consultation database, as above;</li> <li>• Provide information about the examiner's report and decision on the Council's social media sites.</li> </ul>
<b>4. Referendum information statement</b> The city council publishes the Referendum Information Statement and specified documents, setting out the date and procedure for the Neighbourhood Plan referendum. A minimum of 28 working days notice will be given.	<ul style="list-style-type: none"> <li>• Keeping you informed</li> </ul>	No less than 28 working days before a Neighbourhood Plan referendum: <ul style="list-style-type: none"> <li>• make electronic copies of the referendum information statement and documentation available on the Council's website;</li> <li>• make hard copies of the referendum information statement and documentation available at the Council's office and Millennium library for inspection;</li> <li>• inform relevant specific and general consultees and those on the consultation database, as above;</li> <li>• Provide information about the referendum on the Council's social media sites.</li> </ul>

Key stages	Involvement Level	Public/stakeholder involvement arrangements
<b>5. “Making” of the neighbourhood plan</b> The city council confirms that the Neighbourhood Plan has come into effect (has been “made”) <sup>3</sup> .	<ul style="list-style-type: none"> <li>• Keeping you informed</li> <li>• Supporting independent community initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Publish the neighbourhood Plan – make electronic copies and any supporting documents available on the Council’s website and hard copies available at Council’s office</li> <li>• Notify those who have asked to be informed about the making of the neighbourhood plan.</li> <li>• Provide information about the made plan on Council’s social media sites.</li> </ul>

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<sup>3</sup> Under planning legislation, neighbourhood development plans prepared by the community are referred to as being “made” when they take legal effect. This is distinct from local plans prepared by a council or other local planning authority, which are “adopted”.

### 3. Consultations on planning applications

#### Introduction

49. Planning applications are considered through the development management process. It is important that the views of the general public and stakeholders are taken into account to inform decisions.
50. The legal minimum requirements of publicity on planning applications are set out in legislation. These requirements include publication on the Council's register, notices displayed near the site and/or neighbours being notified directly. For some applications, an advertisement is required in a local newspaper. Similar requirements apply to applications for listed building consent.
51. This section sets out the council's approach to encouraging, and requiring where necessary, developers to undertake pre-application consultations and for the involvement of the community in commenting on planning applications.
52. The Planning service standards outline how people can expect to be involved in planning applications and the service they can expect to receive including response times to letters, emails and phone calls. The most up-to-date Planning service standards are available on our website at [www.norwich.gov.uk](http://www.norwich.gov.uk); these will be updated when appropriate to reflect any future changes in legislation or internal processes.

#### Pre-application consultation

53. The National Planning Policy Framework (NPPF) states that local planning authorities should encourage other parties involved in the development process to take maximum advantage of the pre-application stage, so that prospective developers and applicants who are not already required to do so by law may engage effectively with the local community before they make a planning application. This should improve the efficiency and effectiveness of the planning application system for all parties.
54. The city council strongly encourages developers and agents of all application types to engage with the community at the earliest opportunity. For major schemes this is a requirement. This will give the best information on which to base proposals and enable any planning application that is subsequently made to have the best chance of success.
55. Early involvement between developers, the community, consultees and the local planning authority allows issues and concerns to be discussed before planning proposals are formally submitted for assessment and decisions are made. Pre-application involvement by all parties allows issues and concerns to be raised at an early stage, potentially enabling them to be addressed and giving communities the opportunity to shape or influence the development proposals.
56. There are several levels of pre-application service available, depending on the type of development proposed. A fee will be charged for this service. Further guidance can be found on the Council's website at the following link

<http://www.norwich.gov.uk/Planning/PlanningApplications/Pages/PreApplicationAdviceService.aspx>.

57. The Council strongly encourages applicants to consult the local community before submitting a planning application for significant development, in particular:
- Housing developments of 10 or more dwellings;
  - Any other development with a floor area of 1,000 square metres.
58. The **Validation requirements** produced by the Council provide details of the pre-application consultation requirements for applications. These will be regularly updated in accordance with legislative requirements. The validation requirements can be accessed from the Council's website:
- [https://www.norwich.gov.uk/downloads/file/1558/validation\\_requirements](https://www.norwich.gov.uk/downloads/file/1558/validation_requirements).
59. The figure on the next page gives some basic advice on how involvement/consultation would be expected to be conducted:

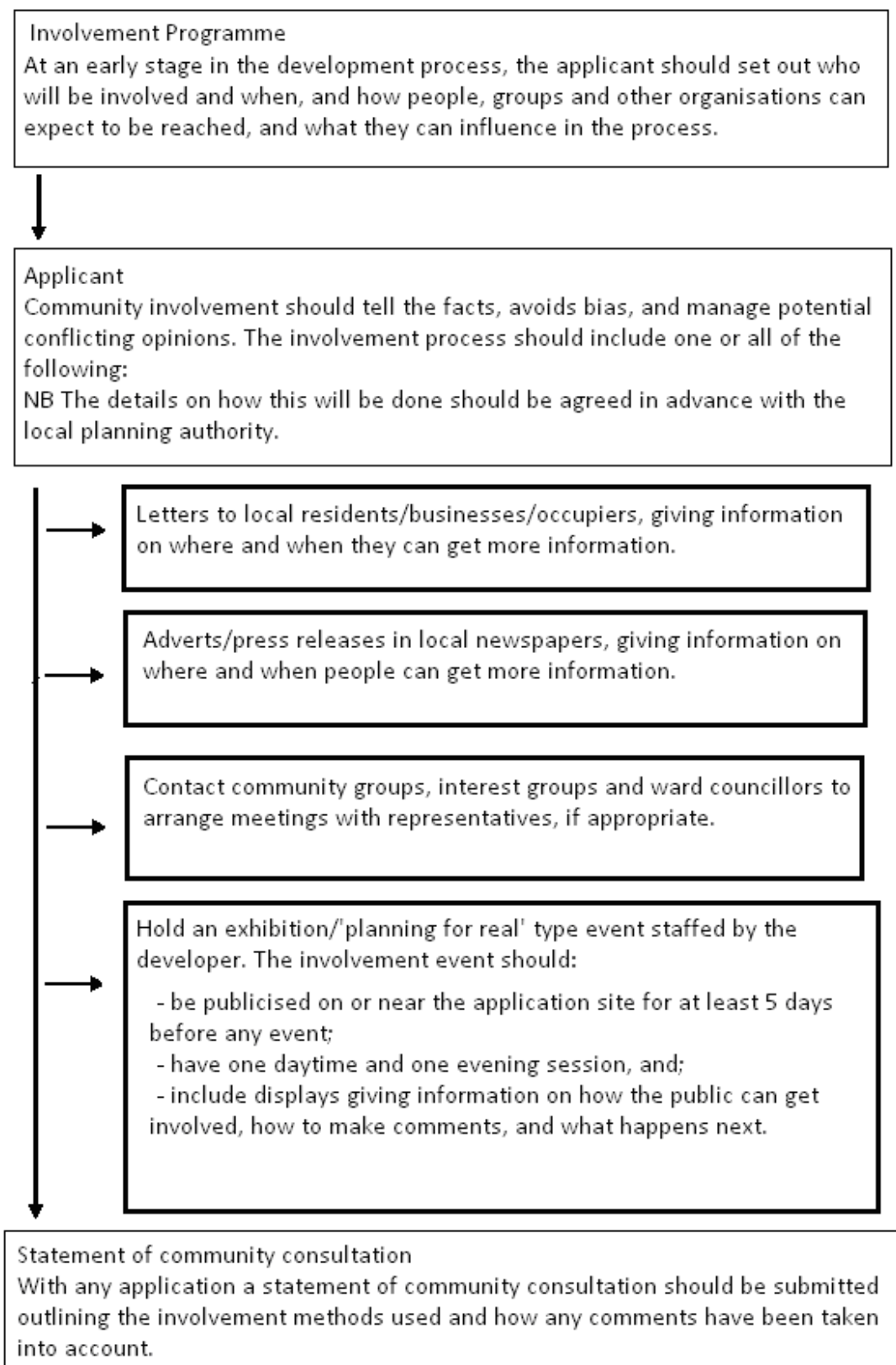


Figure 3: An example of how a pre-application community consultation could be conducted

### Planning application consultation

60. It is important that the community have suitable opportunities to be involved in commenting on planning applications and that those comments are taken into account when the decision is made.

61. The council has a well established process of consultation on planning applications. The main way to find out information on planning applications is through the Planning Public Access service<sup>4</sup> on our website: <http://planning.norwich.gov.uk/online-applications>. You can also sign up to receive e-mail alerts of proposed developments in your area through this service. Other methods currently include:

- i) letters and emails to statutory consultees, other organisations and interest groups;
- ii) letters and emails to residents, businesses and properties within 10metres of the boundary of the site;
- iii) the display of site notices (for some applications);
- iv) publication in local newspapers (for some applications);

*NB The methods listed at ii), iii) and iv) above will be carried out in accordance with at least the minimum requirements of Section 15 of the The Town and Country Planning (Development Management Procedure) (England) Order 2015 (or any updated version thereafter)*

- v) viewing of all comments received on our website;
- vi) viewing of all decision reports on our website;
- vii) presentations at committee (for some applications) (in accordance with the requirements of the Planning Service Code of Conduct);
- viii) committee papers – available a week before each meeting (in paper form/website), and;
- ix) committee minutes – available 7 days prior to the next meeting.

***NB The above list is not exhaustive and may be amended in response to future changes in national planning legislation or regulation. Full details of the consultation methods on planning applications can be found at the following links:***

***[https://www.norwich.gov.uk/info/20017/planning\\_applications/1201/april\\_2009](https://www.norwich.gov.uk/info/20017/planning_applications/1201/april_2009)***

***[https://www.norwich.gov.uk/info/20017/planning\\_applications/1202/june\\_2013](https://www.norwich.gov.uk/info/20017/planning_applications/1202/june_2013)*** (the second link incorporates process changes resulting from the national extension of permitted development rights in the Planning (General Permitted Development) Order 2013)

62. If any planning application is amended during the process of its assessment and the amendment would be likely to have a significant adverse impact on neighbouring properties, then the occupiers of properties affected will be re-notified. All revised or additional documentation or plans will be published on the website. If necessary, the case officer for the application will agree a new determination deadline with the developer/agent as required.

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<sup>4</sup> The Planning Public Access website allows you to search for details of planning applications, plans and supporting documentation that have been submitted to Norwich City Council's planning service.



63. The Planning Portal ([www.planningportal.gov.uk](http://www.planningportal.gov.uk)) provides information on planning in general, with Norwich City Council's website providing more specific information relevant to Norwich. Public Access contains details of all planning applications and comments of consultees and the consideration of the application by officers from December 2005 onwards, with some information on applications from January 1988 to November 2005.



### Material planning considerations

64. In the process of assessing an application the planning officer must have regard to *material planning considerations*. Some examples of material considerations and non-material considerations can be found below (please note, this list is not exhaustive). For example, the loss of property value is not a material planning consideration and will not be taken into account in the assessment of an application.

65. More advice on material planning considerations can be found via the Planning Portal and Planning Aid England by following the links below:

<http://www.planningportal.gov.uk/general/faq/faqapplyprocess%20-%20Whatarematerialconsiderations#Whatarematerialconsiderations>

<http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf>

MATERIAL CONSIDERATIONS 	NON-MATERIAL CONSIDERATIONS 
<ul style="list-style-type: none"> <li>National and local policies</li> </ul>	<ul style="list-style-type: none"> <li>Issues considered under Building Regulations</li> </ul>
<ul style="list-style-type: none"> <li>Planning history and previous appeal decisions</li> </ul>	<ul style="list-style-type: none"> <li>Land/boundary disputes, including rights of access</li> </ul>
<ul style="list-style-type: none"> <li>Case Law</li> </ul>	<ul style="list-style-type: none"> <li>Opposition to business competition</li> </ul>
<ul style="list-style-type: none"> <li>Impact on sunlight, outlook, privacy and amenity</li> </ul>	<ul style="list-style-type: none"> <li>Loss of property value</li> </ul>
<ul style="list-style-type: none"> <li>Highways issues (e.g. increased traffic movements)</li> </ul>	<ul style="list-style-type: none"> <li>Loss of view (<i>NB this does not include 'outlook'</i>).</li> </ul>
<ul style="list-style-type: none"> <li>Effect on a Listed Building or Conservation Area</li> </ul>	<ul style="list-style-type: none"> <li>Opposition to the principle of a development if permission has been granted by an outline application or appeal decision.</li> </ul>

**Figure 4:** Examples of material and Non-material considerations (Source: RTPi/Planning Portal/ Planning Aid England)

## 4. Resources and management

66. This section discusses the management of the involvement process and the resources available to the council. The local plan is managed by the council's planning policy and projects team and supported by officers from other council departments who will provide expertise, support and advice during the process. The resources are designed to ensure that the Local plan, Sustainable community strategy and other council strategies are linked and that all local community involvement events are coordinated.
67. The council will aim to make the most efficient use of limited staff time and resources to prepare local planning documents and involve people throughout the plan-making process. We will closely work with those involved to understand and agree policies and proposals at an early stage so that outstanding issues can be resolved where possible, meaning that fewer resources are needed at the examination stage to debate outstanding objections. From previous experience of consulting on planning policy documents, using time and resources efficiently to involve the public, developers and other stakeholders at the earliest stage can greatly shorten the length of examination time and reduce unnecessary delays in the plan production process. This helps to ensure that emerging policies and proposals have a broad consensus and will be appropriate and effective in bringing forward sustainable development.
68. The council may engage specialised agencies or consultants for specific parts of the planning policy framework such as masterplanning and evidence studies. They will be expected to undertake public participation and involvement on their proposals and results which will be consistent with this document.



## Appendix 1: Local plan consultees

In the planning policy making process, the Council has to consult organisations which are known as either 'specific' or 'general' consultees. In addition the government has introduced a 'Duty to co-operate' in the 2012 planning regulations<sup>5</sup>; many of the consultees required under the Duty to co-operate are already included in the list of 'specific consultees' below, but for completeness they are all listed separately on page 25. As the legislation and regulations are frequently updated, the lists of consultees below may change over time and must be checked against the requirements set out in any new regulations.

The recent planning regulations set out the specific consultation bodies. Along with relevant government departments, the list contains the following bodies:

### Specific consultation bodies

- The Coal Authority
- The Environment Agency
- The Historic Buildings and Monuments Commission for England (Historic England)
- The Marine Management Organisation
- Natural England
- Network Rail Infrastructure Limited
- The Highways Agency
- Norfolk County Council
- Broads Authority
- Adjacent local authorities
- Norfolk, Suffolk and Cambridgeshire Clinical Commissioning Bodies (or successor health care bodies)
- Norfolk Constabulary
- Police and Crime Commissioner
- Relevant telecommunications companies
- Relevant electricity and gas companies
- Relevant water and sewerage undertakers
- The Homes and Communities Agency
- Local nature partnerships

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<sup>5</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012

### **General consultation bodies - examples**

Through this Statement of community involvement, we are committed to involving a wide range of other groups, organisations and interested individuals in the planning process. This will ensure that as many people as possible who are interested are involved in the future development of Norwich.

The list below provides some examples of general consultation bodies:

- Community groups (area based and topic based)
- Parish councils in Norwich policy area
- Housing organisations
- Housebuilders
- Residents and tenants groups
- Business and commerce organisations
- Economic development agencies
- Educational bodies
- School councils
- Community safety bodies
- Environmental and heritage organisations
- Equal opportunities bodies
- Ethnic minority groups
- Disabled people's organisations
- Older people's groups
- Faith groups
- Health and social care groups
- NHS Norfolk
- Norfolk and Waveney Mental Health Trust
- Youth organisations
- Agents/developers
- Landowners
- Regeneration bodies
- Tourism bodies
- Transport bodies
- Community centres
- Volunteer development organisations
- Sports and recreation organisations
- Health and Safety Executive
- Royal Mail
- Emergency services.
- Gypsies, Travellers and Travelling Showpeople
- Design Review Panel
- Norfolk Historic Environment Service
- Local Enterprise Partnerships
- Interested individuals

**Duty to Co-operate: consultees required under the 2012 Planning Regulations**

(as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013)

- The Environment Agency
- The Historic Buildings and Monuments Commission for England (Historic England)
- Natural England
- The Civil Aviation Authority
- The Homes and Communities Agency
- Clinical Commissioning Groups (established under section 14D of the National Health Service Act 2006);
- The National Health Service Commissioning Board
- The Office of Rail Regulation
- Integrated Transport Authorities
- Highway Authority (Norfolk County Council)
- The Marine Management Organisation

*Note that consultees specific to London are not included in this list.*

