

Sustainable development panel

Date: Wednesday, 28 September 2016

Time: 09:30

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

Committee members:*

Councillors:

Bremner (chair)
Herries (vice chair)
Brociek-Coulton
Grahame
Jackson
Lubbock
Maguire
Thomas (Va)

For further information please contact:

Committee officer: Jackie Rodger
t: (01603) 212033
e: jackierodger@norwich.gov.uk

Democratic services
City Hall
Norwich
NR2 1NH

www.norwich.gov.uk

Information for members of the public

Members of the public and the media have the right to attend meetings of full council, the cabinet and committees except where confidential information or exempt information is likely to be disclosed, and the meeting is therefore held in private.

For information about attending or speaking at meetings, please contact the committee officer above or refer to the council's website



If you would like this agenda in an alternative format, such as a larger or smaller font, audio or Braille, or in a different language, please contact the committee officer above.

Agenda

Page nos

- | | | |
|---|--|-----------|
| 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

To approve the minutes of the meeting held on 29 June 2016 | 3 - 6 |
| 4 | Statement of Community Involvement - post consultation changes

Purpose - This report is about a 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. | 7 - 50 |
| 5 | Greater Norwich Local Plan update

Purpose - This report informs members of the progress of the Greater Norwich Local Plan. | 51 - 92 |
| 6 | Annual carbon footprint exercise

Purpose - This report informs members of the outcomes of the annual carbon footprint exercise. | 93 - 104 |
| 7 | Updated Affordable Warmth Strategy

Purpose - This report informs members of the outcomes of the council's new Affordable Warmth Strategy. | 105 - 106 |

Date of publication: **Wednesday, 21 September 2016**



Sustainable development panel

09:30 to 10:15

29 June 2016

Present: Councillors Herries (vice chair, in the chair), Driver (substitute for Councillor Maguire), Grahame, Jackson, Kendrick (substitute for Councillor Brociek-Coulton), Malik (substitute for Councillor Bremner), Lubbock and Thomas (Va)

Apologies Councillor Bremner (chair), Brociek-Coulton and Maguire

1. Declarations of interest

There were no declarations of interest.

2. Minutes

RESOLVED to approve the minutes of the meeting held on 25 May 2016, subject to the following amendment to item 2, Appointment of vice chair, to delete the word "Grahame" and replace with "Jackson" so that the sentence reads begins follows:

"Councillors Herries and Jackson were nominated as vice chair "

3. One Planet Norwich Festival 2016

The environmental strategy manager presented the report. He advised members that the One Planet Norwich Festival 2017 would take place on 6 and 7 May 2017.

During discussion members congratulated the officers on the success of the festival and asked whether the funding of the festival could be sustained at a time when the council's financial position was under pressure. The environmental manager said that they were working to make the event cost neutral though officer time was considerable. Members noted that the festival was combined with the Eco Awards, in partnership with the county council, and this reduced the council. However members considered that the event could generate income. Some stall holders would be willing to pay and fees could be proportionate to the size or type of organisation (ie not-for-profit or commercial). Other suggestions for generating income included gate fees, food stalls and entertainment such as "environmentally friendly bands". The environmental strategy manager said that some stall holders would be willing to pay for stalls. The venue (The Forum) constrained the nature of the event and the number of activities that could be carried out.

Several members said that the festival had unquantifiable value as it promoted and raised awareness of sustainable living. Members particularly praised the activities

for children and families. The panel also noted that the majority of visitors (67%) were city council residents.

A member said that councillors had been invited to tour the festival before it opened and a few members had taken up this invitation. Some members had been on stalls with non-for-profit organisations. However she considered that there should be a specific role for councillors at the festival as many members felt excluded and would like to be involved, not in a political way, but for themselves and to promote the unquantifiable benefits of sustainable living.

RESOLVED to:

- (1) note the report;
- (2) congratulate the officers involved for the success of the One Planet Norwich Festival 2016 and for their innovative ideas to link to other projects and activities in the city;
- (3) note that the One Planet Norwich Festival will be held on 6 and 7 May 2017 at The Forum;
- (4) ask the environmental strategy manager to consider the panel's comments about the festival and to discuss event sponsorship and member involvement with the executive head of customers, communication and culture.

4. Houses in Multiple Occupation – Options

The head of planning services presented the report and explained the background to the report and the options available to the council.

Discussion ensued in which the head of planning services referred to the reports and answered members' questions. He explained that it was necessary for the council to give a year's notice of an Article 4 Direction to remove permitted development rights, ie. the change of use, or there could be significant risk of compensation being payable to residents by the council.

A member pointed out that there was and always had been a need for single person accommodation and that converted houses in multiple occupation (HMOs) fulfilled this purpose. To remove this type of accommodation was to deny "our youngsters" the opportunity to live independently. There was not enough housing to meet the needs of people on low incomes.

Other members considered that the problems reported by residents in Nelson Ward related to behaviour of the residents rather than the fact it was a HMO. There should be better liaison with the universities and educational establishments to address concerns between communities and students living off campus. There was a working group looking into managing student accommodation and addressing issues with landlords, such as sorting out bin storage and garden maintenance.

During discussion the head of planning responded to a members' suggestion that there could be a combination of options A and B based on a threshold of 25 per cent, similar to Oxford's, and said that it would be possible to apply policies but it would

require the introduction of compulsory licensing for HMOs which would be costly for the council. An application for a HMO that was below the threshold in an Article 4 Direction area could be refused if there was a demonstrable policy that could be enforced or it would fail.

Some members also noted the impact that an Article 4 Direction would have on adjacent areas and noted that the survey responses were low, which did not justify the cost of compulsory licensing. The panel also noted that the council was engaged in the promotion of development of accommodation types to slow HMO conversion rate through planning and assess licensing options (as set out in the appended report to the meeting on 25 March 2015).

During the debate the head of planning services referred to the housing needs assessment and said that there was a high level of need for small households at affordable rents. The market provided larger units responding to demand rather than need. There was an issue about bike and bin storage as HMOS were more densely occupied than houses used for families and therefore needed more storage and generated more waste. Housing stock did not turn over very quickly. The council's main source of information was a survey conducted by BRE in 2014.

Some members expressed concern that they did not want to see parts of the city being empty for part of the year during university vacations or people not being able to afford to buy or rent large family homes which landlords could rent out as HMOs for £2,000 a month.

The chair said that option B would cost in excess of £100 K per annum and the council would find it difficult to support this. She therefore moved the recommendations individually as follows:

RESOLVED:

- (1) with 6 members voting in favour (Councillors Lubbock, Grahame, Jackson, Driver, Thomas and Herries), 1 member voting against (Councillor Kendrick), and 1 member abstaining (Councillor Malik) to recommend that the council pursues an Article 4 Direction to control the development of small HMOs;
- (2) with 5 members voting in favour (Councillors Lubbock, Driver, Thomas, Kendrick and Herries), 2 members voting against (Jackson and Grahame) and 1 member abstaining (Councillor Malik) that the Article 4 Direction would be based on option A (as set out in paragraph 47 of the report):

The panel then considered the threshold that would be applied to an Article 4 Direction based on option A and members referred to the maps attached to the reports.

Councillor Driver moved and Councillor Thomas seconded that the Article 4 Direction should be applied to the areas shown on the map at 30% and with 3 members voting in favour (Councillors Driver, Thomas and Herries), 4 members voting against (Councillors Lubbock, Grahame, Jackson and Kendrick) and 1 member abstaining (Councillor Malik) the motion was lost.

Councillor Jackson moved and Councillor Grahame seconded that the threshold should be 20% as shown on the map but with the boundaries extended to incorporate Newmarket Road, St Stephens Road, Chapelfield Road, Grapes Hill, Barn Road, Heigham Street, Waterworks Road, Dereham Road up to Colman Road, and back to Newmarket Road; and with the areas in Sewell Ward and Thorpe Hamlet Ward excluded. The head of planning services said that incorporating streets where the threshold was not 20% could weaken the application of the Article 4 Direction and mean that there were lower densities (5 to 10%) in some parts of the area covered by the Direction. Councillor Jackson said that he was seeking to protect the roads adjacent to those with a high density of HMOs which would not be protected unless included in the Article Direction. On being put to the vote with 3 members voting in favour (Councillors Lubbock, Grahame and Jackson), 4 members voting against (Councillors Driver, Thomas, Kendrick and Herries) and 1 member abstaining (Councillor Malik) the motion was lost.

Councillor Kendrick proposed a threshold of 40% but it was not seconded and therefore it was not considered further.

Councillor Lubbock moved and Councillor Jackson seconded a threshold of 20% as shown on the map and with 3 members voting in favour (Councillors Lubbock, Grahame and Jackson), 5 members voting against (Councillors Malik, Driver, Thomas, Kendrick and Herries) the motion was lost.

The chair moved and Councillor Lubbock seconded that the threshold should be 30% as shown on the map and it was:

RESOLVED:

- (3) with 6 members voting in favour (Councillors Lubbock, Grahame, Jackson, Driver, Thomas and Herries) and 2 members voting against (Councillors Kendrick and Malik) to recommend that the threshold for the Article 4 Direction is set at 30% of HMO area (as shown in the plan attached to the report);
- (4) request the head of planning services to prepare a report for cabinet seeking authority to take forward this matter.

CHAIR

Report to	Sustainable Development Panel	Item 4
	28 September 2016	
Report of	Head of Planning	
Subject	Statement of Community Involvement - post-consultation changes	

Purpose

This report is about a 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

To:

- (1) note the Statement of Community Involvement with proposed amendments made in response to consultation; and
- (2) recommend that cabinet approves the document as amended for formal adoption.

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 officer(s)

Lara Emerson, Planner (Policy): 01603 212500

Background documents

None.

Report

What is the Statement of Community Involvement?

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 is 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.

Context

2. 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
3. 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. Nevertheless, a review of the SCI is now necessary in order to support the 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).
4. The proposed revisions to the SCI were generally fairly minor. A report about the revised SCI was presented to Sustainable Development Panel at their meeting on 23rd March 2016 and set out the main changes to the 2013 SCI:
 - Additional commentary to refer to recent changes in government legislation and to refer to the preparation of the Greater Norwich Local Plan (GNLP) and the Norfolk Strategic Framework (NSF).
 - Clarification of the consultation processes involved during the preparation of Neighbourhood Plans.
 - Various changes to and clarifications around consultation periods
5. At its meeting of 23rd March 2016, the sustainable development panel resolved:

"to recommend that cabinet approves the revised Statement of Community Involvement for public consultation during June, and, subject to ensuring that consultations do not take place during August."
6. At its meeting of 8 June 2016, cabinet resolved to:
 - 1) approve the revised draft Statement of Community Involvement for public consultation for a period of not less than six weeks; and,
 - 2) authorise the executive head of regeneration and development, in consultation with the portfolio holder for environment and sustainable development, to make any minor changes necessary to the document prior to publication and to make arrangements

to publish the document on the website as soon as reasonably practicable following the date of this meeting.

The Consultation

7. The consultation ran for six weeks from 15 June 2016 to 27 July 2016 with the consultation draft and forms available online, at City Hall and at The Forum. Stakeholders were notified of the consultation by email or post.
8. A total of 12 consultation responses were received from Anglian Water, Broadland District Council, Broads Authority, Brundall Parish Council, Green Party, Historic England, Marlingford and Colton Parish Council, Natural England, NHS England Midlands and East (East), Norfolk County Council North Norfolk District Council and South Norfolk Council. The comments and officer responses can be found in the table below.

Ref	Respondent	Comments	Officer response
1.1	Anglian Water	In order to make a comprehensive timely response to documents that include site allocations it would be helpful for Anglian Water to receive information in a specific format that includes a GIS (shapefile) map showing all the sites and a list of site locations to include the proposed use and the proposed numbers for each site in an excel or word format.	<p>Noted.</p> <p>The SCI states that consultation bodies will be informed of consultations on proposed site allocations by email, where possible. We will aim to send out information in the way suggested, where possible.</p>
1.2		Norwich City offer a pre planning service (paragraph 56) and Anglian Water also offer a pre planning service that provides developers with feasible water and drainage solutions. The Pre Planning Report may be submitted as supporting evidence with a planning application submission.	<p>Noted.</p>
1.3		Although Anglian Water are not statutory consultee on planning applications we are keen to make representations on all major applications (i.e. 10 or more dwellings or floor space to be built is 1,000 square metres or more, or where the site area is 1 hectare or more) and would ask to be notified. We will also comments when requested to do so by the planning authority on minor applications where there are concerns or issues relevant to Anglian Water. The preferred method of notification is by email to planningliaison@anglianwater.co.uk	<p>Change proposed (to consultation checklist).</p> <p>Norwich City Council has a consultation checklist which is used internally by officers to determine which consultees should be notified about any particular application. We propose to amend the consultation checklist to state that we will consult Anglian Water for:</p> <p>Residential proposals > 20 10 units</p> <p>Significant industrial/commercial Any development of > 2 1 ha</p> <p>Individual applications involving a potentially large water usage for industrial purposes or commercial size swimming pools</p> <p>Mineral extraction/waste disposal/landfill sites (County Matters)</p>

Ref	Respondent	Comments	Officer response
2.1	Broadland District Council	<p>Paragraph 44: Broadland District Council objects to the statement, 'We will ensure wherever possible that consultation periods are not timed to coincide with the Christmas, Easter or summer holiday periods' and to the statement, 'We will not undertake consultations during August.'</p> <p>The proposed Norwich SCI should, on this particular issue, be consistent and include similar text to that within the proposed Broadland SCI (Figure 7, page 21) and South Norfolk SCI (Paragraph 65, page 18) in order to support the production of the Greater Norwich Local Plan (GNLP).</p>	<p>Change proposed.</p> <p>In order to ensure a consistent approach with our partners and to aid the smooth running of consultations, text will be amended to match Broadland's & South Norfolk's SCIs.</p> <p>First two paragraphs of the table at Paragraph 44 removed and replaced with:</p> <p>"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 summer holiday period in addition to bank holidays, extra days will be added to allow for this, up to a maximum of 14 calendar days over and above the statutory minimum."</p>
3.1	Broads Authority	<p>We consider that Norwich City Council is good at consulting the Broads Authority on planning applications that we might be interested in commenting. These can range from side extensions adjacent to our boundary or over the road from our boundary to large developments further away. We welcome this. Is there scope in saying this in the relevant section of the SCI? Perhaps talk to the DM team to see when they typically consult us, but recognising that it depends on the nature of individual developments?</p>	<p>Noted.</p> <p>We will maintain the circumstances under which we will consult the Broads Authority:</p> <p>Where an application is likely to have an impact on the Broads Authority area.</p> <p>All proposals on or adjacent to the boundary with the Broads Authority.</p> <p>Any strategic development close to the boundary which is likely to have an impact on the Broads Authority.</p> <p>Any development likely to affect land in the Broads Authority Area. This includes any development including bridges, moorings, quay headings on or over the River Wensum up to New Mills Yard).</p>

Ref	Respondent	Comments	Officer response
4.1	Brundall Parish	No comments.	Noted.
5.1	Green Party	When it comes to complex issues like local plans it would be beneficial to run public workshops that give interested members of the public and important stakeholders the chance to truly understand and engage with local policies. The council is already committed to presentations and exhibitions. Workshops would further increase the depth of public engagement and can be a very useful tool, especially early in the consultation process.	Noted. 'Focus groups' are referred to on page 16 of the draft SCI as a method of engaging the public in the early stages of the SCI. There are four workshops planned for the discussion of various topics during the early stages of the preparation of the GNLP. Industry experts will be invited to each of these events.
5.2		The council strongly advises developers to carry out a pre-planning consultation. In some instances developers carry out multiple rounds of genuine pre-planning consultations and aim to truly engage residents. However in other cases pre-planning consultations are not carried out or are a token exercise without any real opportunity for residents to influence designs. Can the role of pre-planning consultations be strengthened? Can the council further aim to ensure that consultations have a real scope to alter designs rather than posing as a token exercise?	Noted. The council encourages developers to engage in community consultation to a level which is appropriate to the scale of development proposed. Page 24 of the SCI provides a useful guide to developers for engaging in meaningful public consultation.
5.3		It is extremely difficult to make sense of the headings that come up when searching for a planning application or a general search - e.g. one's street. Headings like "details of condition 9: management plan of previous permission" are extremely cryptic and not understandable for the lay person. Is there scope to include a plain English explanation of the application?	Noted. We take great care to summarise proposal descriptions to make them as easily understandable as possible whilst ensuring the descriptions accurately cover all development being applied for. Planning procedures are complex and there are many types of planning application so some proposal descriptions will require some understanding and research into how the planning system works and how a proposal fits into an overall development (e.g. details of conditions, amendments etc).

Ref	Respondent	Comments	Officer response
5.4	Green Party	The process of signing up to receive notification is extremely complicated. If you enter the planning site and have not been told how it works, it is very difficult to work it out. Currently one has to search for an application and then save the search to be notified. Could we include a simpler feature where people can, for example, enter their address and ask to receive notifications of planning applications in a certain radius around their property?	<p>Noted.</p> <p>The process of signing up to receive notifications for applications in a certain geographical area works in a similar way to the system for saving a search on many commercial websites and is therefore considered to be fairly intuitive. Should members of the public struggle with the system, they can contact our planning department who can guide them through the process.</p>
5.5		Another problem is that objectors of planning applications are not automatically notified if and when the application goes to committee (and therefore their chance to speak at committee). Objectors are told in a letter that they have to look up the agenda of future planning committee meetings to check if the application they objected to is included. This prevents residents' engagement with the planning process. As many objectors sign up with their email address, it should be fairly simple to send out an automated message once the application goes to committee.	<p>Noted.</p> <p>Committee papers are uploaded onto the website and attached to applications at least seven days before the committee date.</p> <p>Not all objectors provide an email address and so letters would need to be sent out. Letters can get held up in the post, and there is a significant financial cost of postage and additional staff resources.</p> <p>However, we are working with the software developer to see if we can use the Public Access application tracking and notification system to automate an email notification straight from Public Access when the committee date is specified on a tracked application.</p>

Ref	Respondent	Comments	Officer response
5.6		Finally, many cities have big public notice boards at different public spaces and community hubs (e.g. libraries, train stations, outside city halls etc.) where they display what they are currently consulting on. This could increase the uptake of consultations in Norwich as well and is a feature that we would like to see in the future.	Noted. Consultations on the Development Plan are made available to view at City Hall's planning reception and at the Forum library as well as on the council's website within a list of current consultations. While we appreciate the benefits of a public noticeboard, the resource implications of such a proposal would prohibit us pursuing this option.
6.1	Historic England	With regards to neighbourhood planning, we would welcome notification of proposed neighbourhood planning areas as well as consultation on draft plans. The regulations state that Historic England should be consulted on draft plans where our interests are considered to be affected.	Noted. Page 19 of the SCI states that 'relevant specific and general consultees' will be informed when 'a neighbourhood forum... applies... to designate a Neighbourhood Area'. This would include Historic England.
7.1	Marlingford & Colton Parish Council	Paragraphs 10 & 11: There should be Parish Council involvement with Local Development Orders, Neighbourhood Plans and Neighbourhood Development Orders, Community Right to Build Orders and 'permission in principle' for new housing developments.	Noted. Norwich City Council's area does not contain any parishes and, as such, the SCI does not contain any direct reference to Parish Councils. Nevertheless, Parish Councils would be considered as 'relevant stakeholders' should any consultations extend beyond our boundary.
8.1	Natural England	No specific comments.	Noted.

Ref	Respondent	Comments	Officer response
9.1	NHS England Midlands and East (East)	We note that Appendix 1 consultees, contains NHS Norfolk, this body does not exist and should be removed and replaced with NHS England Midlands and East (East). NHS England Midlands and East (East) commission Primary Healthcare Services, so should be on the Specific consultation bodies list, rather than the general consultation bodies list. NHS England is a statutory consultee.	<p>Change proposed.</p> <p>NHS England Midlands and East (East) added to 'Specific consultation bodies' on page 28 of the SCI.</p> <p>NHS Norfolk removed from 'General consultation bodies' on page 29 of the SCI.</p>
10.1	Norfolk County Council	It is felt that the final SCI should have regard to the emerging "Planning In Health – An Engagement Protocol between Local Planning Authorities, Public Health and the Health Sector Organisation in Norfolk". This document sets out engagement arrangements between LPAs and the health sector on plan making and planning applications.	<p>Change proposed.</p> <p>Norfolk County Council Public Health to be added to the General consultation bodies list on page 29 of the SCI.</p> <p>Change proposed (to the consultation checklist).</p> <p>Norwich City Council has a consultation checklist which is used internally by officers to determine which consultees should be notified about any particular application. In accordance with the emerging "Planning In Health..." document, we propose to amend the consultation checklist to state that we will consult Norfolk County Council Public Health for:</p> <p>Residential proposals > 100 units</p> <p>Any development including the provision of:</p> <ul style="list-style-type: none"> - A care home - Housing for the elderly - Student accommodation <p>Any development which would lead to significant loss of public open space</p>

Ref	Respondent	Comments	Officer response
10.2		Neighbourhood Plans – while the SCI makes specific reference to such plans, it is felt that the SCI should indicate who the statutory consultees are in respect of these plans as set out in the Neighbourhood Plan Regulations (2012 as amended) - see paragraph 1 of schedule 1. These Regulations indicate that the County Council is a statutory consultee (consultation body) and as such would expect to be consulted on any such emerging plans.	Change proposed. Paragraph added to page 28: “Regard will also be had to the consultation requirements indicated in the Neighbourhood Plan Regulations (2012 as amended).”
11.1	North Norfolk District Council	No specific comments.	Noted.
12.1	South Norfolk Council	Paragraph 44: South Norfolk Council is concerned that the table at paragraph 44 in the Norwich document which outlines the timescales for consulting on Local Plan documents differs from that in both the South Norfolk and Broadland documents in that it states that where possible consultations will be timed not to coincide with the Christmas, Easter or Summer holiday period and that no consultations will be undertaken in August. South Norfolk Council would suggest that the wording in the Norwich table be changed to mirror that in the South Norfolk and Broadland tables. It is felt that this level of restriction is unnecessary and the text in the equivalent tables in the South Norfolk and Broadland documents is sufficient in that it states that consultation periods will be extended when they take in all or part of a holiday period and that extra days will be added where a bank holiday falls within a consultation period.	Change proposed. In order to ensure a consistent approach with our partners and to aid the smooth running of consultations, text will be amended to match Broadland’s & South Norfolk’s SCIs. First two paragraphs of the table at Paragraph 44 removed and replaced with: “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 summer holiday period in addition to bank holidays, extra days will be added to allow for this, up to a maximum of 14 calendar days over and above the statutory minimum.”

9. Therefore, the changes proposed to the SCI as a result of the consultation responses are:
 - a) First two paragraphs of the table at Paragraph 44 removed and replaced with:

“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 summer holiday period in addition to bank holidays, extra days will be added to allow for this, up to a maximum of 14 calendar days over and above the statutory minimum.”
 - b) NHS England Midlands and East (East) added to ‘Specific consultation bodies’ on page 28 of the SCI.
 - c) NHS Norfolk removed from ‘General consultation bodies’ on page 29 of the SCI.
 - d) Norfolk County Council Public Health to be added to the General consultation bodies list on page 29 of the SCI.
 - e) Paragraph added to page 28:

“Regard will also be had to the consultation requirements indicated in the Neighbourhood Plan Regulations (2012 as amended).”
10. Changes b) to e), above, are very minor in nature and will not make a significant difference to the operation of the SCI.
11. Change a) is proposed in response to comments from both of our neighbouring authorities, Broadland District Council and South Norfolk Council. It is important that the three SCIs are aligned to avoid delays in the preparation of the Greater Norwich Local Plan.
12. The revised SCI, which incorporates the changes a) to e) above, is attached at appendix 1.



NORWICH
City Council

Statement of Community Involvement for Norwich

A code of practice for involving the community in planning issues

September 2016

Contents

1. Introduction	2
Why we are preparing the Statement of Community Involvement.....	2
Need for review	2
Planning and community Involvement.....	4
The Compact: Code of practice on involvement.....	5
The Council's commitment to equality	5
The role of councillors	5
RTPI Planning Aid England	6
2. Consultations on planning policy documents	7
National policy requirements	7
What kinds of documents are consulted on?	7
The current local plan	8
The emerging local plan	8
Procedural Requirements.....	9
Meeting the Duty to Cooperate.....	9
Consultation Methods.....	11
How long will consultations last?	13
Who will we involve, and how?	14
Public involvement in Local Plans (Development plan documents).....	16
Public involvement in Supplementary Planning Documents (SPDs) and planning briefs	18
Publicising Neighbourhood Plans	19
3. Consultations on planning applications	22
Introduction	22
Pre-application consultation	22
Planning application consultation	25
Material planning considerations	26
4. Resources and management	27
Appendix 1: Local plan consultees	28
Specific consultation bodies	28
General consultation bodies - examples	29
Duty to Co-operate: consultees required under the 2012 Planning Regulations	30

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

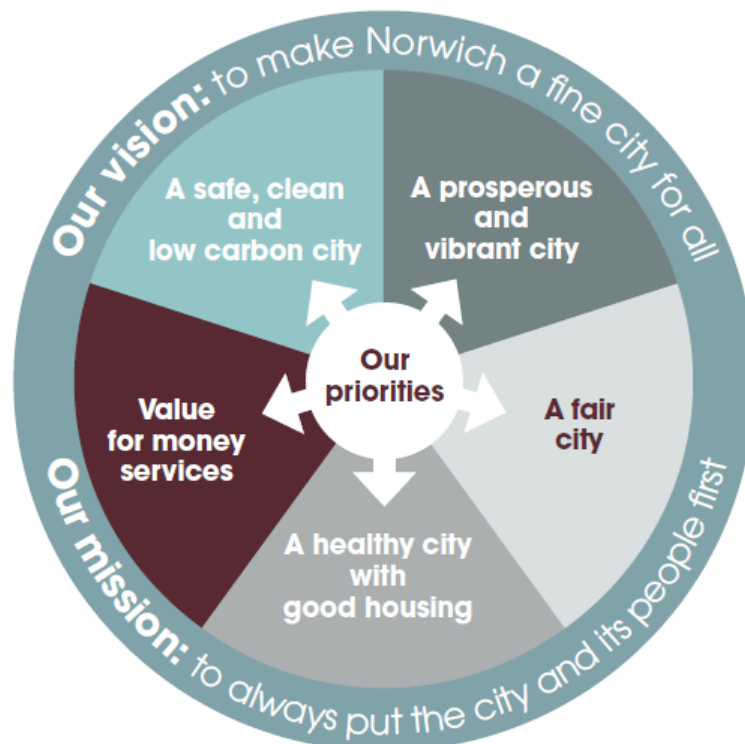
as soon as practicable. There will also be an increased role for neighbourhood plans prepared directly by local communities.

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
Web: 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

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; and
 - 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.

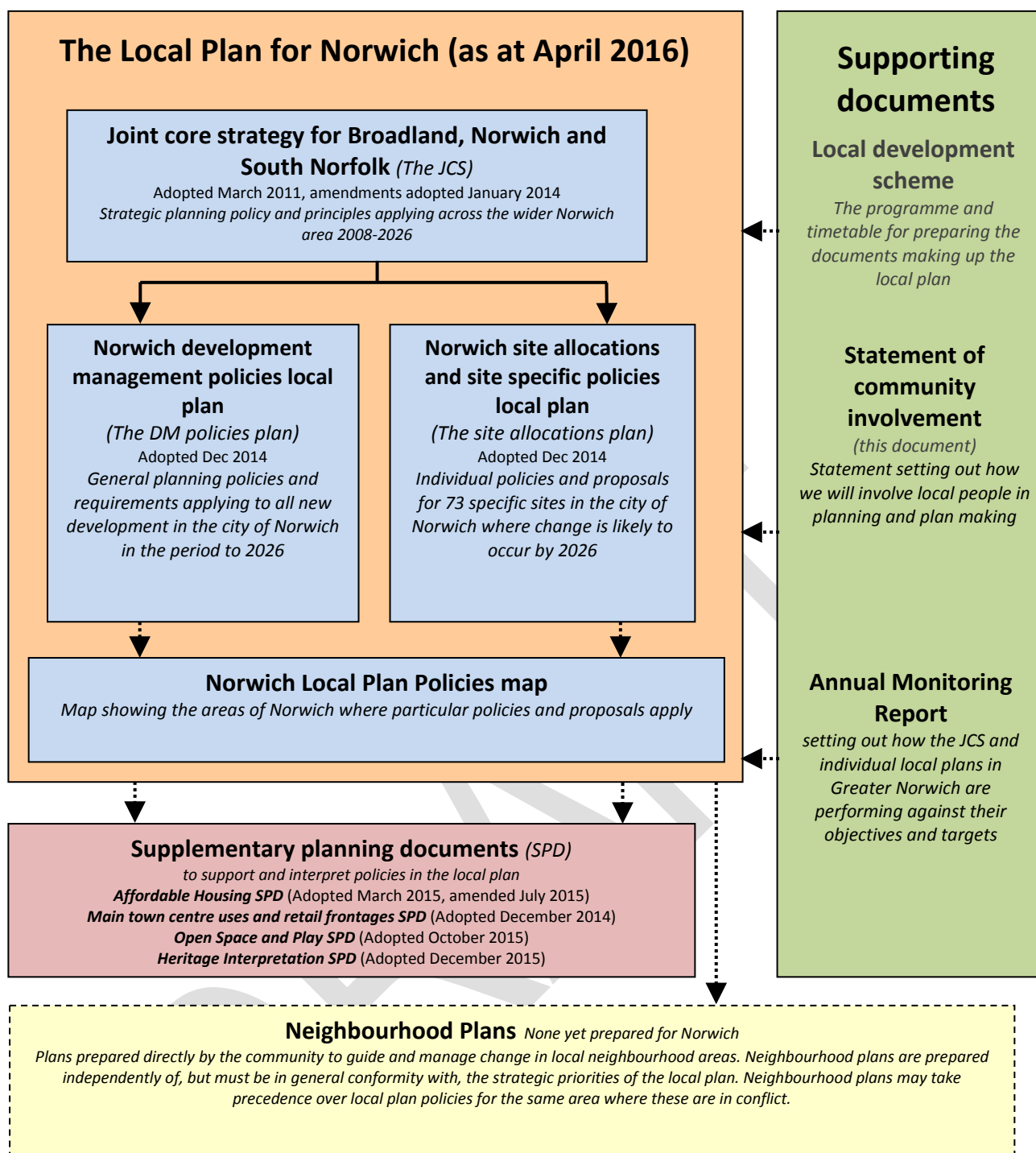


Figure 2: Documents making up the adopted local plan

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"¹ type events
 - presentations to community groups
 - public meetings
 - focus groups
 - exhibitions
 - local councillors
 - social media



¹ "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.

- 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 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 six weeks (42 calendar days) on DPDs	Where a normal period of consultation would take in all or part of the Christmas/New Year holiday, the Easter holiday or the

Document type	Normal period for consultation	Circumstances in which the consultation period will be extended
Neighbourhood development plans ("Neighbourhood plans")	We will consult for at least the minimum statutory period of six weeks (42 calendar days) when proposals for neighbourhood plans prepared by designated neighbourhood planning bodies are published	July/August summer holiday period in addition to bank holidays, extra days will be added to allow for this, up to a maximum of 14 calendar days over and above the statutory minimum.
Future reviews of this Statement of Community Involvement (SCI)	We will consult for at least six weeks (42 calendar days) on any future reviews of this SCI	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.
Supplementary planning documents (SPD) including planning briefs	We will consult for at least the minimum statutory period of four weeks (28 calendar days) on SPD and on planning briefs which have the status of SPD	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").
Non-statutory planning documents and informal advice notes	We will consult for a period appropriate to the coverage and content of the document concerned	

45. For supplementary planning documents (SPDs) 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.

DRAFT

Public involvement in Local Plans (Development plan documents)

Key stages	Involvement Level	Public/stakeholder involvement arrangements
1. Pre-production/evidence gathering The information needed for the plan is prepared and potential issues identified.	<ul style="list-style-type: none"> Asking you what you think Deciding together 	<ul style="list-style-type: none"> Writing to statutory environment bodies to initiate Sustainability appraisal screening Early involvement of relevant stakeholders Hold focus group sessions where necessary to help decide issues to be included in the plan
2. Draft Local plan 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"> Asking you what you think 	<ul style="list-style-type: none"> Publish draft documents for consultation for a minimum of six weeks, and, at the start of the consultation period, <ul style="list-style-type: none"> publish the Sustainability scoping report or appraisal as appropriate; 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); inform relevant consultation bodies , other interested bodies and individuals on the consultation database, as above; publish electronic copies of the consultation documents on the Council's website; make hard copies of consultation documents available for inspection at the Council's office and the Millennium library; issue press release in local papers; add consultation information on Council's social media sites. Arrange public meetings, exhibitions, focus groups as appropriate
3. Publication of the Local plan 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"> Asking you what you think 	<ul style="list-style-type: none"> Publish the Local plan and relevant documents for consultation for a minimum of six weeks, and, at the start of the consultation period, <ul style="list-style-type: none"> publish a statement of the representations procedure; publish the Sustainability appraisal report for consultation; publish a consultation statement summarising all comments received from the previous stages and how the comments have been considered and taken into account; publish relevant supporting documents; inform specific consultation bodies, as above; inform relevant general consultation bodies , other interested bodies and individuals on the consultation database, as above; publish electronic copies of all the documents on the Council's website; make hard copies available for inspection at the Council's office and the Millennium library;

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

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

Key stages	Involvement Level	Public/stakeholder involvement arrangements
1. Pre-production/evidence gathering The information needed for the plan needs to be prepared and potential issues need to be identified.	<ul style="list-style-type: none"> Asking you what you think Deciding together 	<ul style="list-style-type: none"> 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 Where necessary, preliminary consultations will be carried out prior to the publication of draft SPDs
2. Draft SPDs/ Planning briefs 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"> Asking you what you think 	<ul style="list-style-type: none"> Publish the Draft SPD/planning brief for consultation for a minimum of four weeks, and, at the start of the consultation period, <ul style="list-style-type: none"> make electronic copies of the plan and supporting documents available on the Council's website; make hard copies of the plan and supporting documents available at the Council's office and Millennium library for inspection; 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); issue a press release for the matters concerned if appropriate; provide consultation information on Council's social media sites. Arrange exhibition or presentation to interest groups if appropriate
3. Adoption 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"> Keeping you informed 	<ul style="list-style-type: none"> 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 Publish a consultation statement summarising all comments received from the previous stages and how the comments were considered and taken into account 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. provide information on Council's social media sites

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 body² 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
1. Neighbourhood Area Application 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"> • Keeping you informed • Asking you what you think • Supporting independent community initiatives. 	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"> • make electronic copies of the proposal documentation available on the Council’s website; • make hard copies of the proposal documentation available at the Council’s office and Millennium library for inspection; • 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); • issue a press release relating to the proposal if appropriate; • add information about how to respond to the proposal on the Council’s social media sites.
2. Submission of a Neighbourhood Plan	<ul style="list-style-type: none"> • Keeping you informed 	Publish the submitted plan and invite representations for a minimum of six weeks, and, at the start of the period,

² 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
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"> • Asking you what you think • Supporting independent community initiatives 	<ul style="list-style-type: none"> • make electronic copies of the submitted plan available on the Council's website; • make hard copies of the submitted plan available at the Council's office and Millennium library for inspection; • inform relevant specific and general consultees and those on the consultation database, as above; • issue a press release relating to the Neighbourhood Plan if appropriate; • provide information about how to respond to the plan on the Council's social media sites.
3. Publication of examiners report 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"> • Keeping you informed 	<ul style="list-style-type: none"> • make electronic copies of the examiner's report and decision statement available on the Council's website; • make hard copies of the examiner's report and decision statement available at the Council's office and Millennium library for inspection; • inform relevant specific and general consultees and those on the consultation database, as above; • Provide information about the examiner's report and decision on the Council's social media sites.
4. Referendum information statement 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"> • Keeping you informed 	No less than 28 working days before a Neighbourhood Plan referendum: <ul style="list-style-type: none"> • make electronic copies of the referendum information statement and documentation available on the Council's website; • make hard copies of the referendum information statement and documentation available at the Council's office and Millennium library for inspection; • inform relevant specific and general consultees and those on the consultation database, as above; • Provide information about the referendum on the Council's social media sites

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

³ 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; 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.

59. The figure on the next page gives some basic advice on how involvement and consultation would be expected to be conducted.

DRAFT

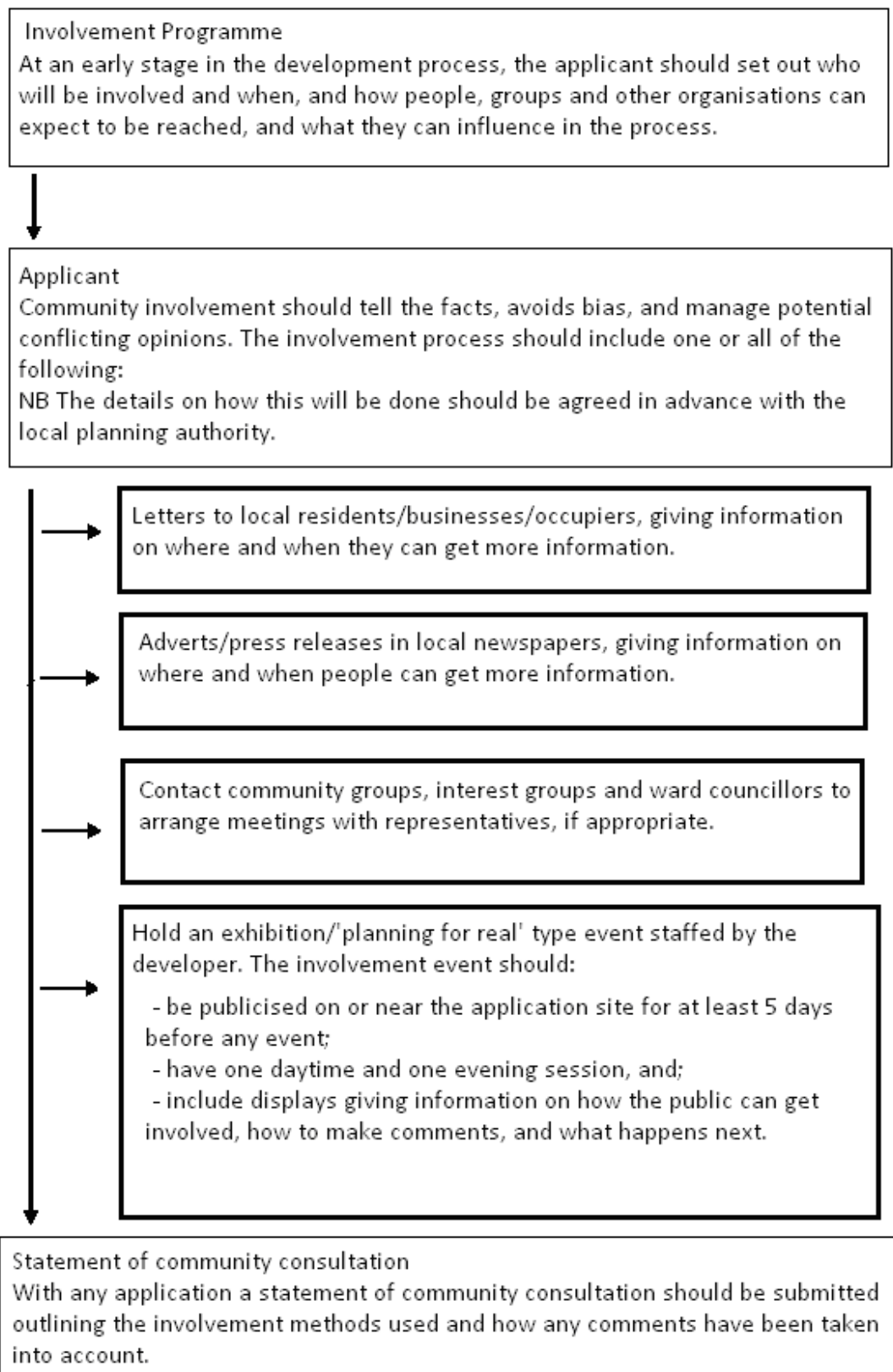


Figure 3: An example of how a pre-application community consultation could be conducted

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 service⁴ 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);
- 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 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). 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/1202/june_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-

⁴ 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.

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.

63. The Planning Portal (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 planning considerations	Non-material considerations
National and local policies	Issues considered under Building Regulations
Planning history and previous appeal decisions	Land/boundary disputes, including rights of access
Case Law	Opposition to business competition
Impact on sunlight, outlook, privacy and amenity	Loss of property value
Highways issues (e.g. increased traffic movements)	Loss of view (NB this does not include 'outlook')
Effect on a Listed Building or Conservation Area	Opposition to the principle of a development if permission has been granted by an outline application or appeal decision

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 master planning 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 is required 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 regulations⁵; 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 bodies below.

Regard will also be had to the consultation requirements indicated in the Neighbourhood Plan Regulations (2012 as amended).

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)
- NHS England Midlands and East (East)
- 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

⁵ 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
- Norfolk and Waveney Mental Health Trust
- Youth organisations
- Agents/developers
- Landowners
- Regeneration bodies
- Tourism bodies
- Transport bodies
- NCC Public Health
- Community centres
- Volunteer development organisations
- Sports and recreation organisations
- Health and Safety Executive

- Royal Mail
- Emergency services.
- Gypsies, Travellers and Travelling Show people
- 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.

Report to Sustainable development panel
28 September 2016
Report of Head of planning services
Subject Greater Norwich Local Plan update

Item

5

Purpose

This report informs members of the progress of the Greater Norwich Local Plan.

Recommendation

To note:

- (1) progress made on the Greater Norwich Local Plan;
- (2) the content of the stakeholder forum Issues Paper and seek clarification or comment on any issues raised.

Corporate and service priorities

The report helps to meet the corporate priority to provide a prosperous and vibrant city and the service plan priority to produce a local plan.

Financial implications

The local plan is funded from existing budgets.

Ward/s: All Wards

Cabinet member: Councillor Bremner – Environment and sustainable development

Contact officers

Graham Nelson, Head of Planning Services 01603 212530

Mike Burrell, Greater Norwich Planning Policy Team Manager 01603 222761

Background documents

None

Report

Background

1. The recommendation to progress with a Greater Norwich Local Plan (GNLP) for Broadland, Norwich and South Norfolk was agreed by sustainable development panel (SD panel) on 24 February 2016 and vabinet on 9 March 2016, with the Local Development Schemes (LDS) being updated accordingly. The commitment to produce the GNLP was also agreed by Broadland and South Norfolk districts, with Norfolk County Council agreeing to work in partnership with the districts.
2. The GNLP will be a review and roll forward of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk. It will provide both the planning strategy and allocate sites to enable the delivery of the homes, jobs and infrastructure needed in the area to 2036, whilst protecting environmental assets. When adopted, it will supersede the JCS and Norwich's Site Allocation Plan which plan to 2026, as well as other site allocation documents for Broadland and South Norfolk.

Progress on the Greater Norwich Local Plan

3. The progress made to date on joint working and plan making is set out in sections 3 and 4 of the September 2016 Greater Norwich Development Partnership (GNDP) report attached as appendix A. This includes:
 - The Greater Norwich Development Partnership Board has been established (see also below for further details);
 - A dedicated officer team with representatives from all four councils, based at County Hall, has been established;
 - Evidence on projected housing requirements to inform site allocations and affordable housing requirements has been gathered – this will be updated regularly through the plan making process;
 - Work has also begun on other elements of the evidence base including economic and viability evidence for the area;
 - A “Call for Sites”, to help to identify potential sites for allocation for a variety of uses, has been completed, with officers currently logging and mapping the sites, and site assessments being progressed;
 - Work has begun on the Sustainability Appraisal and Habitats Regulations Assessment to accompany the plan. The former will examine the environmental, social and economic implications of the plan. The latter will assess the potential impacts of different possible growth locations on internationally protected habitats;
 - A review of JCS area wide policies has begun;
 - Workshops to gain early stakeholder input on key issues the plan should address have been held. An Issues Paper, which is appendix 2 of the September GNDP report attached as appendix A, informed discussions;
 - Legal and planning “Critical Friends” have been appointed;
 - Work has begun on a communications strategy.

The Greater Norwich Development Partnership

4. On 25 May 2016 the SD panel agreed to recommend to cabinet that the Greater Norwich Development Partnership (GNDP) should be re-established to provide a forum for member oversight and discussion of GNLP plan making in accordance with the terms of reference which formed an appendix to the report. It also agreed to recommend to cabinet that the LDS should be updated to reflect revised timetables for the GNLP. These

recommendations were subsequently agreed by cabinet, with the other constituent authorities also agreeing the re-establishment of the GNDP.

5. The first meeting of the re-established GNDP took place on 5 September 2016.
6. The GNDP firstly agreed the terms of reference which had been considered by the sustainable development panel on 25 May, adding that they should be amended slightly to make it clear that the GNDP meetings would be held in public.
7. Secondly the panel considered an introductory report on the GNLP (appendix A). The GNDP noted progress made on the GNLP, agreed the next steps for plan preparation and provided early views on key issues and themes for the GNLP.
8. The main issues raised were (note – this is not an official minute of the meeting):
 - The importance of the communications strategy for the GNLP highlighting the benefits of the local plan in terms of providing new jobs, infrastructure and increased prosperity in the area, alongside providing new housing;
 - The merits, or otherwise, of retaining the Norwich Policy Area (NPA), of continuing to concentrate the majority of development in and around Norwich and of greater dispersal of development to market towns and villages;
 - The problems associated with the granting of planning permissions (largely on appeal) in recent years in a number of locations in the NPA above JCS requirements due to the lack of a 5 year land supply;
 - The merits or otherwise of establishing a Green Belt around Norwich.

The next steps

9. The high level timetable for plan production is in appendix 1 of the September GNDP report (appendix A).
10. It is intended that the sites submitted under the Call for Sites, the progress on evidence gathering, feedback from the stakeholder workshop sessions and emerging plan themes and directions will be considered at the partners' respective policy development panels/committees and at the GNDP in November/December 2016, including Norwich's SD Panel on 30 November.
11. The regulation 18 public consultation on the GNLP is programmed for October to December 2017. There will be further member engagement on the emerging plan between the planned November/December meetings and this consultation being begun.
12. Adoption of the GNLP is scheduled for late 2020.

Greater Norwich Development Partnership Board

5 September 2016

Item No 2

Greater Norwich Local Plan – Introductory Report

Mike Burrell – Greater Norwich Planning Policy Manager

Summary

The following report provides an introduction to the Greater Norwich Local Plan (GNLP) process for the first meeting of the Greater Norwich Development Partnership (GNDP) Board. The report summarises the work which has already been undertaken in terms of:

- the initial work to start the production of the GNLP, including identifying the housing requirement and the call for sites to accommodate growth;
- establishing the team to deliver the GNLP;
- existing and additional evidence needed to inform the content of the GNLP; and
- the preparation of the GNLP Issues Paper to facilitate stakeholder workshops in mid-September 2016.

Views are sought from the GNDP on any key directions and themes the members would wish to see considered at this early stage of preparing the plan.

Recommendation(s)

It is recommended that members of the GNDP:

- (i) Note initial progress made on the GNLP;
- (ii) Give early consideration to the key issues and themes for the GNLP;
- (iii) Agree the next steps for plan preparation.

1 Introduction

- 1.1 Broadland, Norwich and South Norfolk councils have an existing Joint Core Strategy (JCS) which plans to 2026, and supporting Local Plan documents which plan to at least 2026 and beyond in the case of the Broadland Growth Triangle Area Action Plan.

- 1.2 Working with Norfolk County Council, the three local planning authorities (LPAs) are now reviewing and rolling forward these documents in the form of a joint Greater Norwich Local Plan (GNLP) looking to 2036.
- 1.3 The GNLP will set out both the strategic planning policies and the site allocations and will replace the existing Joint Core Strategy (JCS), as well as the site specific elements of the respective Local Plans¹. The starting point for the review assumes that all sites identified for development in an existing local or neighbourhood plan remain appropriate.
- 1.4 This report sets out the work undertaken to date and the work which will lead to the identification of a favoured option and reasonable alternatives for the GNLP in 2017. It also seeks an initial view from the Greater Norwich Development Partnership (GNDP) Board on key directions and themes that members would wish to see considered at this early stage of preparing the plan.

2 Background

- 2.1 As part of the process of preparing the current local plans for Broadland and South Norfolk the respective examination Inspectors highlighted the need for an early review of the plans in order to extend the time horizon to the 15 years minimum recommended by the National Planning Policy Framework (NPPF). The replacement local plans therefore need to be in place by late 2020, five years after the adoption of the South Norfolk Site Specific Allocations and Policies Document and the Wymondham Area Action Plan.
- 2.2 To demonstrate the commitment to an early review of their local plans, Broadland and South Norfolk councils informed their Inspectors that the Greater Norwich authorities, working with North Norfolk and Breckland councils, had commissioned the Central Norfolk Strategic Housing Market Assessment (SHMA). The SHMA updates information on the overall number of new homes required along with the mix of homes and affordable housing requirements within that overall need. The SHMA projects the requirements forward to 2036, to mirror the end date of the GNLP, see 4.2 below for more details.

3 Joint Working

- 3.1 The authorities have a long track record of co-operation. The JCS was prepared by the GNDP and was originally adopted in 2011, with amendments adopted in January 2014.
- 3.2 Subsequently the focus has been on the implementation and delivery of the JCS policies and allocated local plan sites. This will continue to be the focus of the Greater Norwich Growth Board (GNGB).
- 3.3 On 24 September 2015, the GNGB resolved to recommend to the respective authorities that a GNLP should be produced, consisting of strategic policies (similar to those in the JCS) and site allocations. Development Management Policies would continue to be produced and reviewed separately by the three LPAs. The September report concluded that it would be *'more difficult and risky for each LPA to seek to address the wider strategic matters in a piecemeal, district-by-district basis. In addition, moving away from a joint plan*

¹ Broadland Site Allocations DPD; Broadland Growth Triangle Area Action Plan; Norwich Site Allocations and Site Specific Policies Local Plan; South Norfolk Site Specific Allocations and Policies Document; Long Stratton Area Action Plan & Wymondham Area Action Plan.

would convey a negative message on our commitment to work together to deliver economic growth’.

- 3.4 A key driver for the inclusion of sites within the GNLP is the emphasis on deliverability; the approach in the JCS meant that there was a considerable delay between setting the growth requirements and the allocation of sites to deliver that growth. Amongst other implications, this has not helped with securing a five year housing supply in the Norwich Policy Area (NPA).
- 3.5 The recommendation to progress with a GNLP was reported to the respective authorities and their Local Development Schemes (LDSs) were updated accordingly:

Authority	September 2015 GNGB recommendation reported	Updated LDS
Broadland	Cabinet, 19 January 2016	
Norwich	Sustainable Development Panel, 24 February 2016	Cabinet, 9 March 2016
South Norfolk	Cabinet, 2 November 2015	Cabinet, 15 February 2016

The GNDP Board

- 3.6 Because the production of a new local plan is not within the terms of reference of the GNGB, governance for plan production will fall under a separate body. It was also considered that a broader membership would be beneficial for the plan making role of the group overseeing the GNLP. Following the GNGB meeting of 24 March 2016 the Greater Norwich authorities have agreed that the GNDP Board will be re-established to oversee at least the initial stages in the production of the GNLP. This was agreed by the respective authorities during May and June and the relevant councillors were nominated to make up the Board. The GNDP Board is not a decision making body and this responsibility still sits with the respective councils. Therefore, member engagement will be both through the GNDP Board and through the various committees of the constituent authorities.

The GNLP team

- 3.7 In order to progress the GNLP, a team has been set up and Mike Burrell (Norwich City Council) has been appointed as Greater Norwich Planning Policy Manager. The team comprises one further full time equivalent member of planning staff from Norwich, two each from Broadland and South Norfolk and one from Norfolk County Council; these full time equivalent hours are distributed across more members of staff to maximise the benefits of the existing expertise within the authorities' teams. Additional staff will provide dedicated support for the work of the GNLP team.
- 3.8 The work of the GNLP team is overseen by the Infrastructure Delivery Board (IDB), made up of senior level representatives from the partner authorities and New Anglia LEP. As well as the work streams, the IDB will oversee the GNLP budget and provide coordination with the GNGB and the Greater Norwich Projects Team's work on infrastructure and delivery.

4 Work to date

- 4.1 Previous reports to the respective authorities have noted that work has already been progressing on a number of elements of the GNLP; the following is an

updated summary.

Strategic Housing Market Assessment (SHMA)

- 4.2 As noted above the Greater Norwich authorities initiated the process of plan review through the commissioning of a SHMA which sets out the projected housing requirements for Central Norfolk to 2036, known as the objectively assessed need (OAN) for housing. The SHMA takes into account the growth aspirations of the Greater Norwich City Deal and equates to approximately a further 12,000 new homes for Greater Norwich between 2012 and 2036, over and above those already built, permitted or allocated, as follows:

SHMA Objectively Assessed Need (April 2012 to March 2036)	52,170
Already built (April 2012 to March 2015)	4,160
Committed sites (at 1 April 2015)	23,375
Emerging sites (at 1 April 2015)	12,782
Remainder to be allocated	11,853

- 4.3 The above figures assume all of the committed sites (permissions and allocations) and emerging allocations will be delivered by 2036, but does not make any assumption about future windfall. This position will be updated as the plan progresses to reflect further completions and additional commitments made since 1 April 2015, along with any changes in the underlying populations/ household projections which underpin the OAN or other relevant changes to evidence.
- 4.4 The NPPF requires local plans to “meet objectively assessed need with sufficient flexibility to adapt to rapid change”. To enable the delivery of OAN, and to help maintain a 5 year land supply, there will be a need to allocate more housing than the minimum OAN figure. This has been reflected by Inspectors’ decisions at examinations into local plans, including for the recent Growth Triangle Area Action Plan.
- 4.5 The exact level of allocation that is appropriate will need to be established through the production of the GNLP taking into account any change in Government policy and relevant inspector’s decisions. An example of how additional allocations above OAN might be reflected in Local Plans is highlighted by the recent Local Plans Expert Group (LPEG) recommendation to Government. This proposes that an additional 20% buffer of ‘reserve’ sites should be identified for all unbuilt homes in local plans. If applied to the GNLP this would mean 52,170 OAN – 4,160 already built = 48,010 remainder of the OAN, 20% of which would equate to reserve sites for a further 9,600 dwellings. Whilst currently far from certain, a 20% uplift is considered likely to represent a “high end” scenario.
- 4.6 It should also be recognised that the OAN in the recently published Central Norfolk SHMA already includes an element of uplift in Greater Norwich related to commitments to jobs growth. The OAN itself may also change as new Government projections for population and household increase are released; this could result in increases or decreases in the final GNLP requirements.
- 4.7 The SHMA also sets out the proportion of affordable housing required to meet the needs of the area, although this is likely to be reviewed to take into account

the Government's Starter Homes requirements.

Call for Sites

- 4.8 Because the GNLP will include site allocations as well as strategic policies a formal 'call for sites' was undertaken between 16 May and 8 July 2016. The call invited the submission of sites for all uses, including housing, employment, retail and town centre uses, recreation and 'Local Green Spaces', the latter of which provides special protection for green areas of particular importance to local communities.
- 4.9 The call for sites was sent to planning and land agents, known sites owners (including those who submitted their sites for inclusion in previous plans), local businesses who may have aspirations to expand and town and parish councils. The call also received extensive publicity in the Eastern Daily Press.
- 4.10 The call invited submission of both green and brownfield sites, from small urban plots to potential large-scale greenfield developments and the authorities have sought to glean as much information as possible from those submitting the site(s) to support the subsequent assessments.
- 4.11 These sites are currently being logged and plotted and further details will follow in the November GNPD report.

Site Assessment

- 4.12 Each of the submitted sites is being assessed, alongside other sites such as unimplemented allocations from the existing local plans and unimplemented (or partially implemented) extant planning permissions. This process is not intended in any way to delay the progress of allocated sites in adopted plans to achieving planning permission given that the GNLP will not be adopted until late 2020.
- 4.13 The sites are being assessed through a Housing and Economic Land Availability Assessment (HELAA). A HELAA methodology, based on the Government's requirements, has been jointly prepared by the Norfolk LPAs as part of the Norfolk Strategic Framework (NSF) process. The assessment of sites will also form part of the Sustainability Appraisal (SA) of the plan.

Sustainability Appraisal & Habitats Regulation Assessment

- 4.14 A key element of the production of any plan is the assessment of the potential impacts of the emerging policies and allocations. Sustainability Appraisal (SA), which is undertaken alongside the development of the plan itself, will examine the environmental, social and economic implications of the proposed policies and allocations and help identify how the proposals can be refined and impacts mitigated. Consultation on the first stage of SA, a scoping report, took place between 20 June and 15 August 2016. Officers are currently finalising the scoping report. The SA will be undertaken by the GNLP together with Lepus Consulting.
- 4.15 In addition the Landscape Partnership has been appointed to undertake the Habitats Regulation Assessment (HRA), which will assess the potential impact of different possible growth locations on internationally protected habitats; the first stage of this is a critical evidence review to identify any outstanding information which is needed to complete the assessment.

Reviewing the JCS area wide policies

- 4.16 Since the GNLP will be a review and roll forward of the JCS, the GNLP team is undertaking an initial review of JCS area wide policies (policies 1 to 8), for example to identify any areas where they have been superseded by national policy changes.

Critical friends

- 4.17 Legal and planning 'critical friends' are being engaged to provide ongoing external challenge and support to ensure the work on the GNLP is legally compliant and produces a sound plan when set against the context of the existing planning legislation and proposed changes.

Timetable

- 4.18 A broad timeline for the production of the GNLP has already been shared with the GNGB; an updated version of this timeline highlighting the key stages at which member involvement will be required is attached at appendix 1.
- 4.19 In line with the current regulatory requirements and in order to produce the GNLP within the required timeframe the stages in document production have been streamlined. Full public involvement will take place at the Regulation 18 consultation stage, which will set out a favoured option and reasonable alternatives, and Regulation 19, which will be the proposed submission plan.
- 4.20 The recent LPEG report to Government has recommended that local planning authorities be able to make changes to the proposed submission version of the plan following Regulation 19. This proposed change is supported by the Greater Norwich authorities as an aid to speeding up the plan process.

5 The Issues Paper and Stakeholder Workshops

- 5.1 The first substantive stage in the development of the plan is a series of stakeholder workshops. Invitations were sent in July for workshops during the week commencing 12 September. The purpose is to gain early stakeholder input on the key issues the plan should address through discussion of the Issues Paper questions. The Issues Paper is attached in appendix 2.
- 5.2 Separate workshops will cover the Issues Paper's themes of: Housing, Transport, the Environment, and the Economy, with the strategic distribution of growth being a key consideration for each of these. In addition, area based workshops will give the opportunity for other organisations, such as town and parish councils, to input at this early stage. The outputs of the workshops will be reported to members in November.

Key Issues for the GNLP Board

- 5.3 While it would not be appropriate to pre-empt discussions and analysis by answering the following questions, it would be useful for members to advise on any key factors that they consider will influence consideration of:
- Whether the Greater Norwich area should be divided into two or more policy areas;
 - Potential patterns of growth;
 - The potential for a new settlement or settlements;
 - Particular locations of growth and restraint;

- Delivering major new infrastructure;
- The desirability of a Green Belt for Norwich;
- Rolling forward area wide policies (JCS policies 1 to 8).

This is by no means an exhaustive list and GNDP members may wish to raise other key considerations on the direction of the plan at this stage.

6 Evidence

6.1 Good quality evidence is key to developing the plan. It is also important that evidence is proportionate and is collected cost effectively. In some cases evidence will be required to assist in the identification of the most appropriate locations for additional growth, in others it will be required at a later stage of plan making to, for example, provide clarification on the infrastructure required to serve the growth options promoted. Consequently evidence gathering will involve:

- Specific studies on core issues such as the local economy and development viability. In these cases it will be necessary to commission dedicated new evidence.
- Where possible, existing JCS evidence will be updated in consultation with key stakeholders. Ongoing engagement is planned with service and infrastructure providers such as Anglian Water, as well as statutory consultees and regulatory bodies such as the Environment Agency, Natural England and Historic England, to fully understand the growth constraints and opportunities. This engagement will cover a wide range of issues including education, health, social infrastructure (sports facilities, community buildings etc.) and utilities.

Transport for Norwich (TfN)

6.2 The current Norwich Area Transportation Strategy (NATS) was adopted in 2004. A small number of minor policy changes were subsequently agreed in April 2010 as part of the development of the JCS. Given the date of the NATS, many of its measures have now been implemented and others need to be reviewed. To assist the development of the GNLP to 2036, a commitment has been made by the NATS Board to update the strategy alongside the GNLP.

7 The Next Steps

Development of the 'plan alternatives'

7.1 Following the workshops the next stage for the GNLP will be the development of a series of options for the plan. The steer on key considerations from the GNDP Board, the outcomes of the stakeholder workshops, the evidence gathered to date and the results of meetings with key infrastructure providers will help to shape the content of the strategic policies and identify areas for possible growth in the GNLP.

7.2 The GNLP team is currently undertaking a high level assessment of the capacity of different locations to accommodate growth.

7.3 Member input in November will help identify a range of plan alternatives which can then be worked up further for members to review in early 2017. The robustness of this stage in the plan preparation will be essential to support the

choice of any favoured option for the Regulation 18 consultation. The timetable at appendix 1 provides details.

8 Issues and Risks

Other resource implications (staff, property)

- 8.1 As noted above, the Greater Norwich Planning Policy Manager has been appointed and a team of planning staff seconded from the four authorities. Provision is also being made for dedicated support staff. The budget to deliver the GNLP is being overseen by the IDB. The GNLP team has recently moved to permanent accommodation in County Hall.

Legal implications

- 8.2 The Greater Norwich authorities are required to have an up-to-date Local Plan and Broadland and South Norfolk Councils have made commitments through the examination of recent plans to a timescale for getting the GNLP in place. NPLaw is providing ongoing advice to ensure that the plan is produced in accordance with current Regulations and with any amendments to those Regulations.

Risks

- 8.3 The risk of not preparing a replacement for the JCS and maintaining a supply of allocated sites is that the plans become increasingly out of date and subject to challenge.
- 8.4 The GNLP is being produced to a streamlined timetable and requires prompt agreement across the participating authorities; the most significant risks are unforeseen events that cause delays within what is currently a very tight timeline and/or significant changes in Government policy which provide new challenges for the plan.

Equality

- 8.5 The GNLP will be supported by an Equalities Impact Assessment.

Environmental implications

- 8.6 The GNLP process is underpinned by national requirements to achieve sustainable development and is supported by both an HRA and SA process. The plan will also continue to identify Green Infrastructure and other environmental enhancements as part of the policies and proposals.

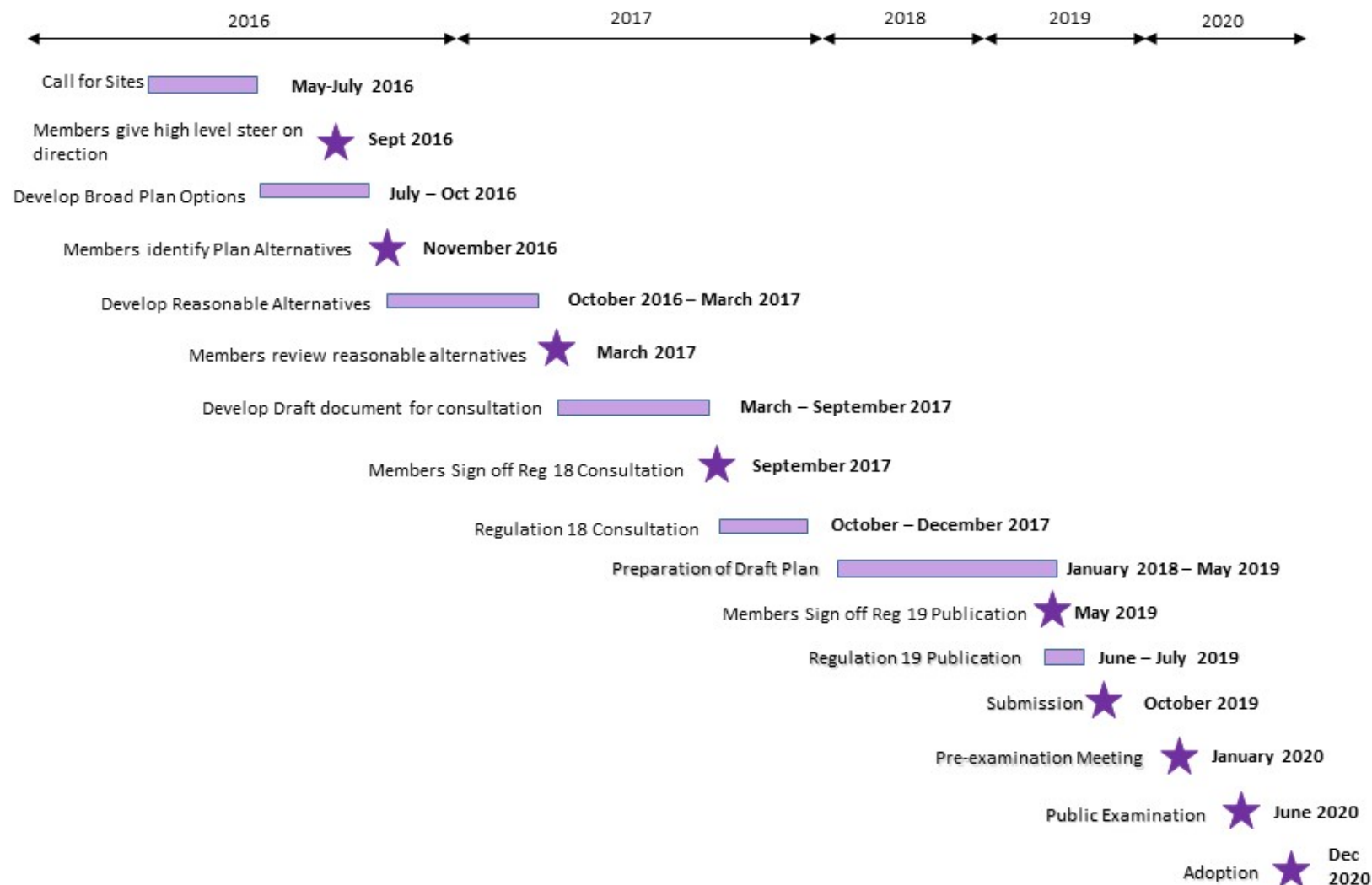
Officer Contact

If you have any questions about matters contained in this paper please contact:

Name	Telephone Number	Email address
Mike Burrell	01603 222761	mike.burrell@norfolk.gov.uk

Appendix 1

Greater Norwich Local Plan: High Level Timetable to Adoption



Appendix 2

Greater Norwich Local Plan

Issues Paper

July 2016

This paper has been issued as a discussion document intended to stimulate technical debate at the Greater Norwich Local Plan workshops in September 2016. It has been prepared by district and county council officers and does not represent policy.

Preamble

This “issues” paper has been produced to support discussions at stakeholder workshops designed to help inform the early stages of development of the **Greater Norwich Local Plan (GNLP)**.

The GNLP will need to address the challenge of rolling forward the existing local plan strategy, set out in the Joint Core Strategy (JCS) and site allocation plans, to 2036. It will also need to support the positive approach to growth set out in the City Deal. The GNLP will provide both the strategic policies and allocate the sites to enable the sustainable delivery of the additional growth our early evidence shows we will need.

This paper consists of an introduction followed by sections focussing on key inter-linked issues: the strategic distribution of growth; transport; housing; the economy and the environment. Each section contains questions intended to stimulate discussion at the GNLP stakeholder workshops.

Each workshop is focussed on its single topic (e.g. transport) but will also consider how it impacts on other topics and, in particular, the approach to the strategic distribution of growth. The discussions at the stakeholder workshops will help inform the early stages of plan development and should primarily focus on the issues set out in this paper. Site specific issues are unlikely to be relevant to these discussions unless they will have a significant influence on the strategic direction of the GNLP. Further opportunities will exist for representations to be made on site specific issues at later stages of the plan making process.

The workshops are the first stage in stakeholder engagement and will assist the councils in drafting the consultation version of the plan, the “Favoured Options and Reasonable Alternatives”. This will be subject to full public consultation scheduled for October 2017.

Section 1 - Introduction

National Planning Policy

1.1. The **National Planning Policy Framework (NPPF)** sets out Government’s policies for Planning. The NPPF requires Local Plans to be “aspirational but realistic”². Local Plans should contain strategic policies to deliver, amongst other things: the homes and jobs needed in the area; the provision of retail, leisure and other commercial development; the provision of infrastructure; climate change mitigation and adaptation; and, conservation and enhancement of the natural and historic environment, including landscape.

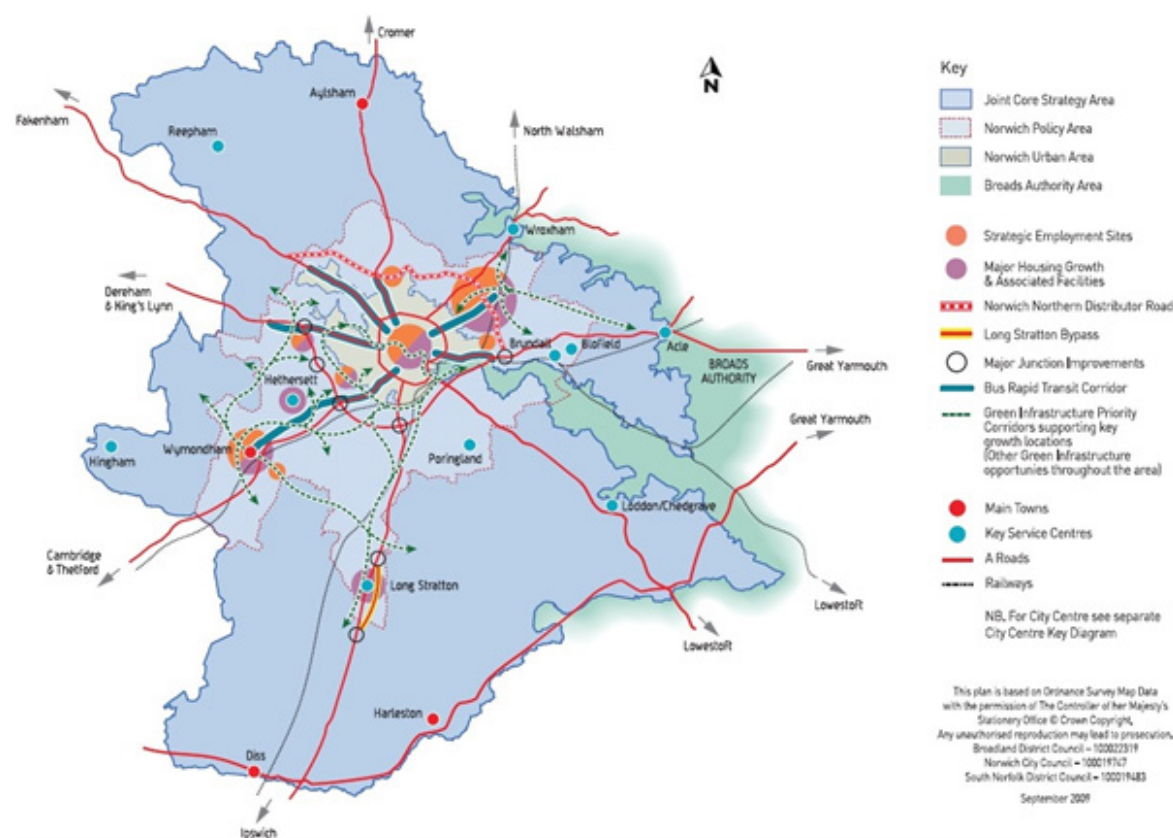
Existing local planning documents

1.2. The **Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS)** establishes a planning strategy for 37,000 new homes and 27,000 new jobs between 2008 and 2026. The development sites to achieve this growth are set out in six site specific planning documents³. The **Greater Norwich City Deal** provides tools to support the delivery of the infrastructure, jobs and skills needed to deliver the JCS. The **Greater Norwich Infrastructure Plan (GNIP)** and **Annual Growth Programmes** are used to manage investment in new infrastructure to deliver this strategy. The GNLP will need to take account of **New Anglia Local Economic Partnership’s Strategic Economic Plan (SEP)**.

² NPPF, 2012, paragraph 143, pg. 37

³ The six site specific documents within the Greater Norwich Area are the: Broadland District Council Site Allocations DPD; Growth Triangle Area Action Plan; Norwich City Site Allocations DPD; South Norfolk Site Allocations Local Plan; Wymondham Area Action Plan; and, Long Stratton Area Action Plan.

Figure 1 The JCS Key Diagram



1.3. The content and implementation of the JCS, Site Specific documents and the City Deal will strongly influence the strategy in the GNLP. The JCS growth strategy to 2026 is summarised in its Key Diagram in figure 1 above.

1.4. The **GNLP** will set out strategic planning policies and identify sites to meet the need for development to 2036 building on the adopted plan. When adopted, the GNLP will supersede the JCS and the six site specific planning documents. The GNLP will not set out locally specific development management policies.

1.5. Early evidence indicates that the GNLP will need to plan to meet the need for 52,170 dwellings between 2012 and 2036. This is approximately 12,000 more homes than are contained in sites with planning permissions and sites allocated in site specific planning documents.

Delivery

1.6. A fundamental thread for the GNLP will be to ensure that all policies and sites are deliverable. Currently the authorities work together closely to deliver the infrastructure that supports growth. Work on the **Norfolk Strategic Framework (NSF)**, which has included engagement with key infrastructure providers, has not identified any overriding infrastructure constraints to the likely scales of growth to 2036 that cannot be overcome. The precise infrastructure needs of the GNLP will be dependent on the location and distribution of development. Where localised infrastructure constraints exist they will influence the strategy and allocations.

Section 2 – The Strategic Distribution of Growth

Background

2.1 The strategic distribution of growth is fundamental to the plan's success. Three overriding considerations for the distribution of new growth are:

- The pattern of existing and planned development. The latter is set out in the JCS and in the committed permissions and allocations that deliver it;
- Delivery - ensuring that the GNLP does all it can to deliver necessary housing and employment growth;
- Sustainability – for example ensuring new housing is well related and accessible to jobs and services, reduces reliance on the private car and avoids environmentally sensitive areas.

2.2 The pattern of new growth will also be influenced by infrastructure provision including:

- Recent and planned improvements such as the NDR, A47 dualling and junction improvements, bus priority measures, and the cycling network;
- Constraints - such as lack of waste water capacity in some areas; and
- Opportunities – such as forecast capacity in local schools.

2.3 Growth and the pattern of development in neighbouring districts outside the Local Plan area may also have an influence. In particular:

- 4,000 houses are planned in Attleborough, and 5,000 in Thetford;
- Energy related economic growth taking place at Gt Yarmouth and Lowestoft and
- The role of out-of-area “border” towns such as Beccles and Bungay.

2.4 The distribution of development around some urban areas in the UK is strongly influenced by designated Green Belts. Currently there is no Green Belt in the Greater Norwich area but one has been promoted by the Campaign to Protect Rural England (CPRE).

2.5 Green Belts prevent most types of development and are intended to prevent urban sprawl and the coalescence of settlements. Their primary intent is not therefore to protect attractive countryside, which can be sought through other policy measures.

2.6 If a Green Belt were introduced in the area, the overall growth needs of Greater Norwich would still need to be met and the GNLP would also have to demonstrate how growth needs could be delivered over a longer period than just the plan period to 2036. This would likely require allocating or safeguarding significant amounts of urban fringe land on the inside edge of the Green Belt, or as “holes” within it, alongside the identification of land outside. The metropolitan Green Belt, designated in the 1950s, was supported by a programme of new towns and expanded towns to deliver growth.

2.7 The implications of a Green Belt are far reaching for the growth strategy and should be considered for each remaining issue in this paper.

Delivering homes – site size and concentrated or dispersed growth patterns

2.8 The size of sites affects delivery:

- The smaller a site the more likely it is to have limited site-specific infrastructure requirements, be more attractive to smaller builders (broadening the range of firms engaged in delivery) and to be able to take advantage of any capacity in existing infrastructure. Very small sites of fewer than 5 dwellings are more likely to be “windfall” rather than allocated in the GNLP;
- Larger developments have longer lead-in times but benefit from economies of scale, tend to deliver well once started, and are more likely to provide and support new infrastructure.

Current commitment and distribution

2.9 The plan could seek a high degree of concentration of growth or greater dispersal. Concentration will generally be delivered by large sites, although it is also possible to have a number of medium or smaller sites concentrated around a village or town. Delivery may be enhanced by greater geographical dispersal to widen markets but there will also be a greater tendency for residents to need to travel to jobs and services with less opportunity to use public transport, cycling or walking. Dispersal can increase the costs of service provision such as for school transport.

- 1. To ensure delivery, what is likely to be the best balance between small, medium and large sites and how will this vary across the area?**
- 2. What is likely to be the best balance between concentration of sites and dispersal?**

Towns, Key Service Centres, Service Villages and Other Villages

2.10 Policies 13 to 17 of the JCS identify a hierarchy of settlements that reflects the scale and type of services and facilities available. The approach to defining each type of settlement is set out in the supporting text to each policy. Generally speaking the scale of planned growth in a town or village reflects this hierarchy, but also takes account of the settlement's accessibility to Norwich and other constraints and opportunities.

- 3. Are the JCS criteria for defining the hierarchy still appropriate and should any towns or villages move up or down?**
- 4. Should the Plan provide higher levels of housing and employment growth in a wider range of settlements, including encouraging growth in small villages with few or no services?**

Allocations, neighbourhood plans and rural development

2.11 A possible approach for the GNLP would be to allocate all the sites required to deliver the identified level of need for homes and jobs only in locations at the higher end of the settlement hierarchy, leaving neighbourhood plans to allocate additional sites and review settlement boundaries in smaller settlements. A local plan must be able to demonstrate that it can deliver the scale of growth needed and it is normal practice to identify additional opportunities for homes and jobs to ensure that needs are met (i.e. to over-allocate slightly to ensure there is a choice of sites). The neighbourhood plan allocations would contribute to these additional opportunities. This approach would provide flexibility and choice, but also has greater uncertainty.

- 5. Is this approach reasonable or appropriate?**
- 6. Is the neighbourhood planning process likely to deliver sufficient growth and flexibility?**
- 7. Where would the cut-off be (at which tier of the hierarchy)?**

Greater Norwich Planning Policy Areas

2.12 The JCS currently divides Greater Norwich into three separate policy areas, the Norwich policy area (NPA), the rural area of South Norfolk and the rural area of Broadland (see figure 1 above). The NPA is intended to keep Norwich related growth as close as possible to the Norwich urban area (reflecting the area's importance as an employment, retail and leisure hub). Historically, with Broadland, Norwich City and South Norfolk producing separate local plans, the policies of the NPA allowed growth to be co-ordinated and distributed across the three local planning areas. Currently, the JCS allocates around 90% of housing growth and all strategic employment locations to the NPA. The NPA is an area over which a five year supply of housing is currently calculated, with separate assessments of the remaining parts of Broadland and South Norfolk.

2.13 Given that this plan includes site allocations, the need for retention of the NPA needs to be considered. Since the role of the NPA has been to provide the strategic framework for subsequent local plan documents allocating sites, it may be that alternative policy approaches are now more appropriate to steer the identification of sites. A policy providing a criteria-based approach which continues to focus most growth near Norwich could be considered. Alternatively, greater dispersal of some of the growth away from the Norwich urban area than previous plans promoted may have benefits in delivery terms.

2.14 With the more extensive growth plans for Broadland, Norwich and South Norfolk into the future one approach would be to remove the NPA definition and area entirely and regard the whole area of Broadland, Norwich and South Norfolk as a planning area in this context. Any development would still be subject to a criteria based sequential approach to ensure the key elements of sustainability and deliverability remain.

2.15 Should we decide to retain the NPA approach, consideration will need to be given to whether the NPA's current boundaries remain appropriate.

<p>8. Given the above explanatory paragraphs, what is the best policy approach for managing the distribution of growth across the three districts?</p>

The influence of existing strategic growth locations

2.16 The selection of the existing growth locations in the JCS (identified on the Key Diagram in figure 1 above with further details in figure 2 below) was supported by wide ranging evidence including sustainability appraisal. These areas are supported by varying levels of existing services and employment opportunities, and by infrastructure investment. Each of these locations could be considered for additional growth, taking account of local constraints and opportunities. However, there may be questions about whether some of these areas could or should take significant further growth, or whether a period of consolidation for them, with growth focussed elsewhere, would be a more appropriate strategy.

2.17 Within the urban area, redevelopment sites will continue to come forward. While the overall scale of land that can be found is likely to decline through time, there is some demand for more intense use of sites. The scale of growth that can be accommodated will depend on the approach to intensification.

Figure 2 Current growth commitment

Current growth location	Current growth commitment
Norwich (City Council area)	Around 7,400 homes and office development.
NE quadrant (Growth Triangle and adjacent locations)	Around 13,400 homes in the Growth Triangle and adjacent parts of parishes; 140ha of employment land.
Easton/Costessey area	Around 1,800 homes; 13 ha of employment land at Longwater, plus additional potential at the emerging Food Enterprise Zone.
Crangleford/Colney	Around 1,500 homes; 44 ha of employment land allocated at Norwich Research Park (NRP)/Norfolk and Norwich University Hospital (NNUH).
Hethersett	Around 1,400 homes; Close to NRP/NNUH.
Wymondham	Around 2,200 homes; 20 ha of employment land in Wymondham and 20 ha at Hethel.
Long Stratton (part Tharston parish)	Around 2,000 homes; 12 ha of employment land; Bypass to be provided as part of current committed development; Capacity for sewage disposal may be a significant constraint.

9. Are any of the existing locations suitable for significant additional growth?

10. Are there constraints to further growth and could they be overcome?

11. Can the GNLP help speed up delivery of the existing commitment in these locations?

The potential for new settlements/significant urban extensions

2.18 The GNLP could consider new opportunities for large scale growth, either as new settlements or urban extensions. New settlements are rarely completely new and usually involve the expansion of an existing settlement. Large scale development has a long lead in time but could deliver later in the plan period and/or prepare the ground for the next plan. A number of locations for large scale growth have been proposed to the councils in the past such as Acle, ex RAF Coltishall, and Mangreen. Other locations may also be proposed.

12. Are there opportunities for strategic growth outside the areas identified in the JCS, and what would be the key issues?

13. What would be the role of transport access including rail?

14. To what extent could and should a new or expanded settlement be “stand alone”?

Other options and issues for the strategic distribution of growth

15. Are there and other potential options for the strategic distribution of growth which have not been covered above?

Section 3 - Transport

3.1 Transport spans a wide range of issues, with some being very localised and others linked to the wider economy and connectivity of the Greater Norwich area as a whole. Transport policy and Investment in transport projects and will influence and can be influenced by the scale and location of growth and how those new travel demands are met. To focus discussion, issues are considered under the broad headings of rail, air, major road connections, the Norwich Urban area and rural areas.

Rail

3.2 Rail connections provide important strategic links to the plan area and are important to the vitality of the local economy. Existing JCS policy promotes enhancement of rail services, including improved journey time and reliability to London and Cambridge, station improvements and innovative use of the local rail network.

3.3 The current franchise renewal process will result in commitment to delivering new and improved train services, though the detail is awaited.

16. How can rail infrastructure and services be developed to support the housing and economic growth needs of the area?

Air

3.4 The JCS supports the growth and regional significance of **Norwich International Airport** for both leisure and business travel to destinations across the UK and beyond. Because of its connections, the airport is a focus for airport related employment and sites have been identified in adopted plans for further employment growth. Completion of the NDR by 2018 will improve surface access and connection to the trunk road network.

17. Should the GNLP continue to promote the airport and related activities to support the housing and economic growth needs of the area and if so how?

Major Road Connections

3.5 The **A11** provides access to the A14, Cambridge and London. Dualling from Thetford to Fiveways was completed in late 2014 removing the last single carriageway section between the A11 and A14. On the back of this an economic study has been commissioned looking the opportunities the improved route can bring to the area. Longer term aspirations include grade separation at the Fiveways junction at Mildenhall and improving the A11/A14 junction near Newmarket to cater for all movements.

3.6 Highways England (formerly the Highways Agency) carried out a Route Based Strategy (RBS) on the **A47**, including the A12 from Great Yarmouth to Lowestoft. The findings of the RBS informed Government's Roads Investment Strategy. The investment plan identifies a number of schemes on the A47 in the GNLP area that government have committed to progress for delivery by 2021. These are;

- **A47 North Tuddenham to Easton dualling;**

- **A47 Blofield to North Burlingham dualling;**
- **A47/A11 Thickthorn Junction improvement.**

3.7 The Longwater junction has been the focus of significant development. A scheme funded from a mix of developer contributions and the public sector is being developed to improve traffic flows in the area.

3.8 The A47 Alliance is a group of councils, MPs and business leaders. The long term ambition of the group is for complete dualling of the A47 and grade separation of junctions along the route.

3.9 The **A140** south of Norwich is a former trunk road and provides a strategic link to Ipswich, the port of Felixstowe and the South East. There has been a long term aspiration for a **Long Stratton Bypass** to improve this route. The JCS supports a Long Stratton Bypass and seeks to achieve the bypass by identifying Long Stratton as a growth location as a means of securing its delivery. An Area Action plan for Long Stratton has been adopted which sets out more detailed policy to secure delivery of the bypass.

3.10 Main roads that connect urban areas can be protected from development that would erode their strategic function by **corridors of movement policies**. Protection does not necessarily mean no development, but more weight would be put on ensuring that growth does not have a detrimental effect on the efficiency of the strategic road network.

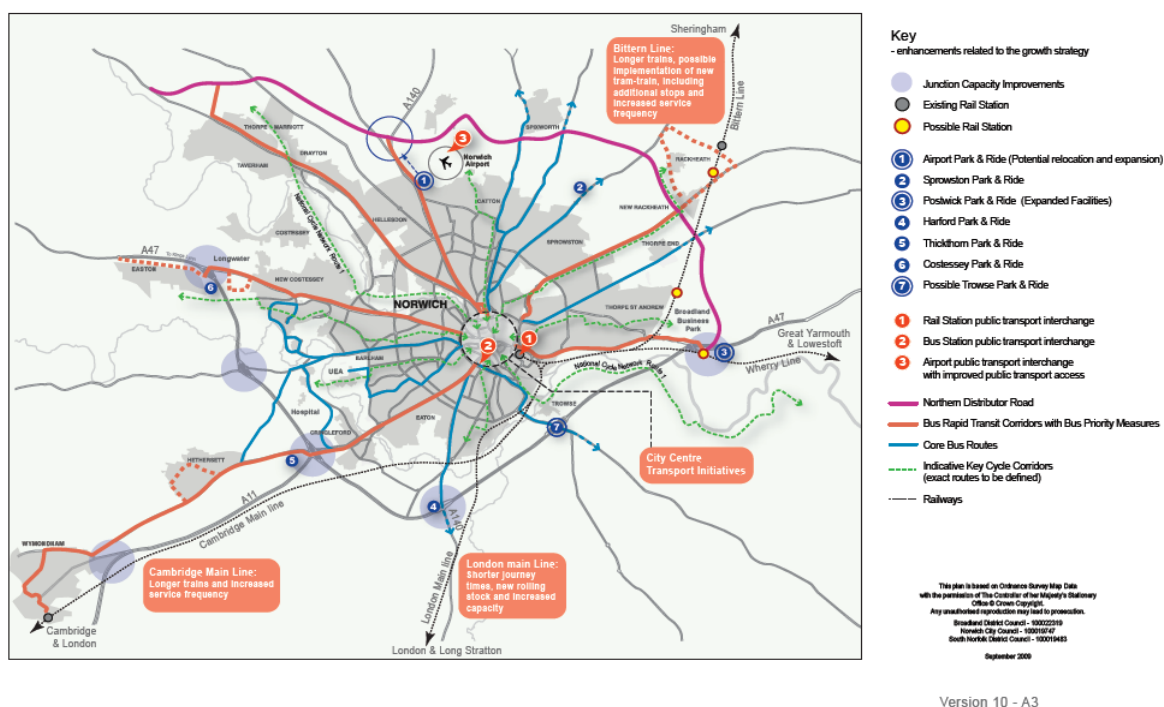
18. Are there any major road connections the plan should promote, protect and improve?

Norwich Urban Area

3.11 Transport in and around the urban area of Norwich has been developed through the **Norwich Area Transportation Strategy (NATS)**. An implementation plan was devised for NATS to set out the range of individual projects and interventions to meet the strategy.

Figure 3 NATS proposed implementation plan

Norwich Area Transportation Strategy
- proposed implementation plan



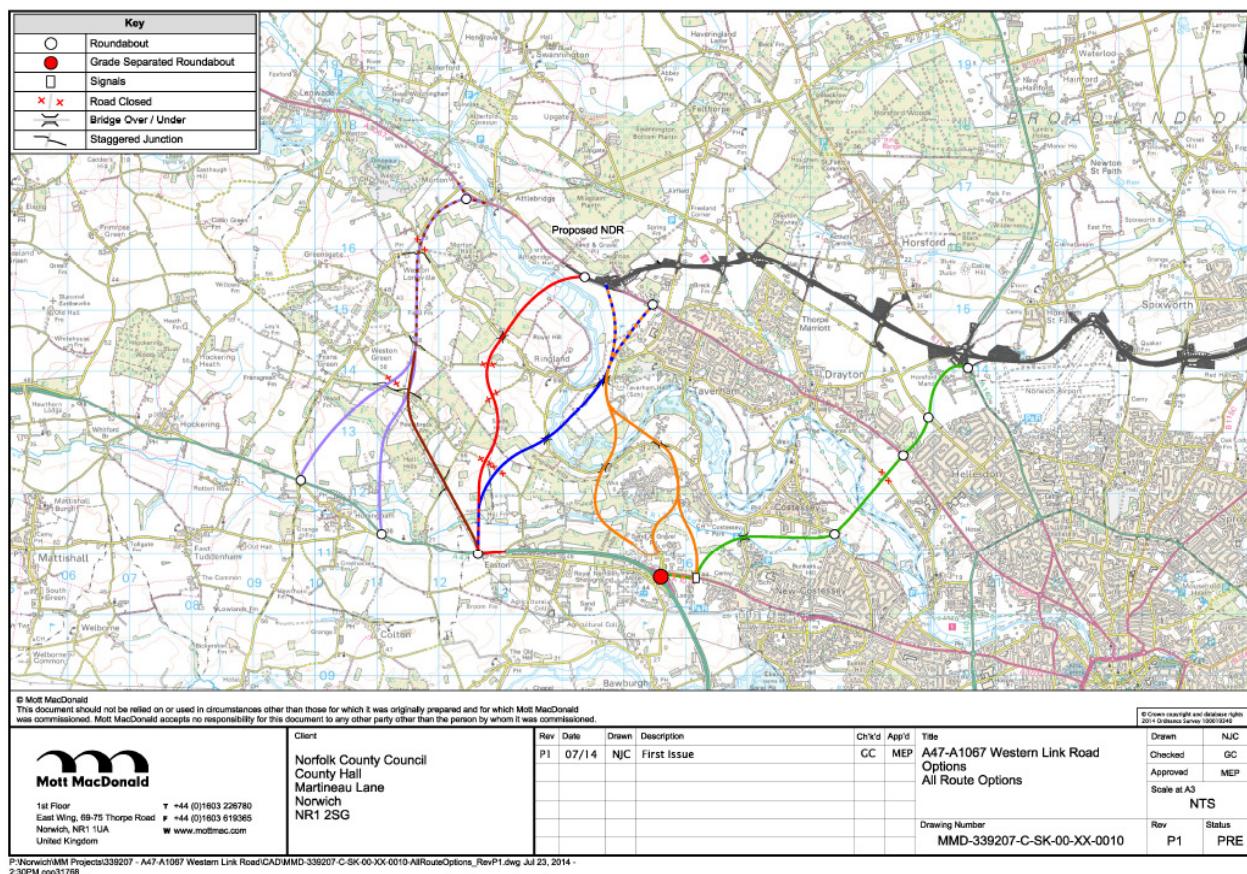
3.12 The JCS and NATS implementation plan were developed in parallel. A number of focused changes were made to the policy to support delivery of the JCS. The existing strategy and implementation plan supports the current approach to planned growth.

3.13 The key elements of NATS as contained within the JCS are delivery of the **Norwich Northern Distributor Road (NDR)**, the promotion of six Bus Rapid Transit (BRT) routes serving areas of significant growth, continued support and development of Park and Ride to manage city centre car parking pressures and enhancements within the city centre to aid walking and cycling.

3.14 In addition to the schemes already being delivered, there is funding secured for targeted improvements to tackle congestion on the inner and outer ring road; bus improvements on Salhouse Road and further phases of work within the city centre to reduce through traffic and improve conditions for pedestrians, cyclists and bus service operation.

3.15 Alongside the development of the GNLP, a NATS policy and implementation plan review will be carried out. The outcomes of these issues workshops will also inform early stages of the NATS review.

19. What changes should be made to the current Norwich Area Transportation Strategy and the focus of the schemes in the current implementation plan to support the GNLP?



Norwich Northern Distributor Road

3.16 The NDR is scheduled to be open by 2018. There remains some pressure to explore a link between the planned western junction of the NDR with the A1067 Fakenham Road and the A47. Norfolk County Council is investigating the issues associated with this. A report was presented to its Environment, Development and Transport Committee in September 2014 which included potential routes (see figure 4 below).

Figure 4 Potential “Western Link” road routes

20. Should the plan support a road link between the A47 and the A1067? If so, what are the reasons for this?

Rural Issues

3.17 Market towns contain a range of services and facilities such as employment, retail and education. Existing policy is to ensure, as far as is practicable, that market towns are served by public transport services. This allows people in the more rural areas without access to a car to get to opportunities likely to be sited in market towns. Bus services are generally run commercially by private companies and this can mean that there are few services, particularly at evenings and weekends. Demand responsive services, often run by community groups, are an alternative to scheduled bus services in many areas but

can sometimes be overlooked by potential users, or seen as offering services only to particular groups such as the elderly.

3.18 The main considerations within market towns are cycle and pedestrian networks (including the pedestrianisation of centres) and the amount of car parking provision.

21. How should rural transport issues influence the GNLP's approach to housing, employment and other development?

Delivery

3.19 An important issue for any plan is that it must be deliverable. GNLP challenges are likely to be meeting the housing needs of the area and strengthening the local economy. Transport policy will continue to be an important influence on the delivery of housing and jobs and should support the wider aims of the plan. Views on how this can be achieved are varied.

22. How can transport policy and implementation increase housing delivery and grow the local economy and what is the evidence to support this?

Section 4 - Housing

Central Norfolk Strategic Housing Market Assessment

4.1 A new **Strategic Housing Market Assessment (SHMA)** was published in January 2016. It covers a wider area than the three Greater Norwich districts to include Breckland and North Norfolk districts, because evidence suggests that the Housing Market Area (HMA) covers these two districts too. The SHMA methodology is consistent with national policy and guidance, and has taken account of planning inspectors' decisions and High Court judgements. It covers the period 2012 to 2036

4.2 Having established the HMA, demographic projections from the Office of National Statistics, local trends, market signals⁴ and employment forecasts and commitments were used to establish the Objectively Assessed Need (OAN) for Central Norfolk area as a whole, and for Greater Norwich.

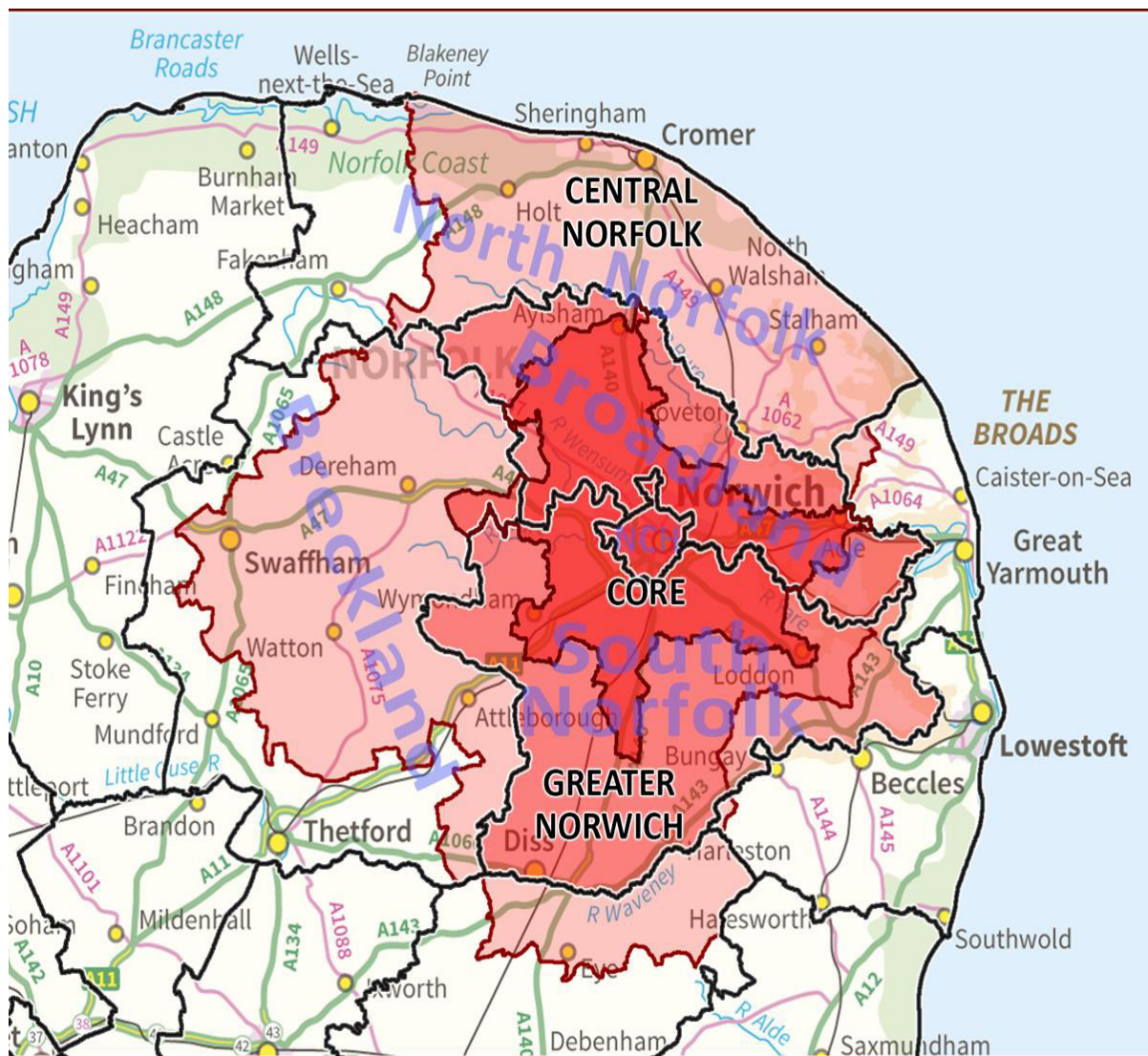


Figure 5 Central Norfolk Housing Market Area

4.3 The OAN for Greater Norwich established by the SHMA is 52,170 dwellings over the 24-year period 2012-36.

⁴ Market signals include property prices, rents, affordability, overcrowding and recent rates of development.

23. Is there any evidence that suggests that the defined housing market area, or the overall level of housing need in the Greater Norwich Area, is wrong?

Distribution of New Housing across Central Norfolk

4.4 As the Central Norfolk HMA is larger than Greater Norwich there is the potential to redistribute some housing numbers between Greater Norwich, North Norfolk and Breckland. Consideration could also be given to redistribution outside the Central Norfolk HMA e.g. between Central Norfolk, Great Yarmouth and Waveney. However, apart from a very small part of rural Breckland, the core market area identified in the SHMA is entirely within the Greater Norwich Area and in general linkages between the wider area and Norwich are weak. Any housing redistribution policy would require robust justifications and evidence and agreement from the relevant neighbouring authorities.

24. Is there any evidence that there should be any redistribution of some of the Breckland and/or North Norfolk need into the Greater Norwich area or vice versa?

25. Is there any evidence that there should be any redistribution of some of the need from Mid Suffolk, Waveney or Great Yarmouth into the Greater Norwich area or vice versa?

Affordable Housing

4.5 The GNLP will need to address the full OAN for affordable housing as well as for market housing. The SHMA indicates if the full OAN for affordable housing is to be met then 26% of all housing delivered across the Central Norwich HMA must be affordable housing. The Government has moved the emphasis to affordable home ownership rather than affordable rented homes⁵. However, there remains a need for affordable housing for rent. The SHMA indicates that to meet housing needs, 79% of all affordable housing in South Norfolk, 86% in Broadland and 90% in Norwich will need to be affordable housing for rent. *(Note: the SHMA figures on affordable housing need do not take account of the intended Government requirement for 20% of dwellings on all sites above a certain threshold to be delivered as Starter Homes. The SHMA may need to be updated to reflect the position when the Starter Homes situation becomes clearer).*

26. How can the GNLP address affordable housing need, including affordable housing for rent?

Specialist Housing

4.6 Changing health, longevity and aspirations of older people and current health and social care policy affects the need for specialist older people's housing. While new technologies and models of care will enable more elderly people to continue to live independently for longer, much greater levels of care and support will be necessary for some. As well as offering new specialist housing there is already an existing stock of older people's housing, including sheltered housing for rent offered by councils and

⁵ House of Commons Library, Housing and Planning Bill (Briefing Paper Number 07331)
<http://researchbriefings.files.parliament.uk/documents/CBP-7331/CBP-7331.pdf>

housing associations, housing with care, and nursing and residential care homes. The health and care sector will determine how existing buildings and services evolve, as well as what new provision is needed. There is also a role for private sector developers respond in meeting the demands for older people's specialist housing. The GNLP will engage with relevant bodies to address these issues.

27. How can the GNLP best help to meet the need for specialist housing for older people?

Provision for Gypsies and Travellers and Travelling Showpeople

4.7 Local planning authorities are responsible for assessing need and making provision for sufficient Gypsies and Travellers sites in their area⁶. This includes securing a five-year supply of deliverable sites. The most recent sub-regional work was done in 2012. The study found a need for 3 pitches in Broadland, 8 pitches in Norwich, and 37 in South Norfolk, plus 6 transit pitches across Greater Norwich over the years to 2026, although South Norfolk prepared a South Norfolk Gypsies & Travellers Accommodation Assessment in 2014, which identified a need for 35 additional pitches from 2014-2031. Furthermore, a need exists to provide more sites for Travelling Showpeople, due to the existing site in Norwich being at capacity. However, this need may be best met outside Greater Norwich because of Showpeople wanting to live more centrally in England for work purposes.

4.8 The three Greater Norwich councils plan to meet the needs for Gypsies and Travellers slightly differently. Broadland is meeting its demand through windfall planning permissions. Norwich has a policy in its Local Plan for meeting the needs of Gypsies, Travellers, and Travelling Showpeople. South Norfolk has begun work on a Local Plan for Gypsies and Travellers but has since paused in the wake of the national changes in policy.

4.9 There is likely to be a need for a mix of private and public Gypsies and Traveller sites across Greater Norwich, and also additional transit sites for temporary use.

28. How can the GNLP meet the needs of Gypsies and Travellers and Travelling Showpeople?

Building Enough New Homes

4.10 The NPPF is explicit in its requirement that Local Planning Authorities (LPAs) should ensure that their local plan meets the full OAN for housing⁷. Delivering insufficient housing poses a number of risks to the Greater Norwich area, including failing to deal with people's needs and reducing the area's economic potential. The national Local Plan Expert Group (LPEG) has recently recommended to Government that 20% over allocation above OAN requirements is necessary to help to ensure full needs are met.

⁶ Planning Policy for Traveller Sites, DCLG, March 2012

⁷ National Planning Policy Framework (NPPF), 2012, paragraph 47, pg. 12

4.11 LPAs must be able to demonstrate a five-year housing land supply. In the absence of an adequate supply of housing land, applications for housing should be granted unless “any adverse impact would significantly and demonstrably outweigh the benefits”⁸.

4.12 An inadequate land supply could therefore lead to additional, unallocated, sites being developed. Whilst this may help delivery in the short term there are also potential adverse effects. In particular it could undermine investor confidence in, or developer activity on, allocated sites. Not only may this undermine the plan-led approach to long term-sustainable planning, it is also likely that unallocated sites will not be as well related to existing or planned infrastructure as allocated sites by virtue of the fact that they do not form part of that plan-led approach.

29. Are there any reasons why the GNLP should not over allocate to help the delivery of houses?

30. Are there any other measures the GNLP could include to help ensure that sufficient housing is delivered in a timely manner?

Windfall Development

4.13 Windfall development, i.e. the development of non-allocated sites, has and will continue to occur across Greater Norwich during the GNLP plan period to 2036. Through the JCS the Greater Norwich authorities sought to allocate enough sites to meet identified housing requirements without relying on any contribution from windfall development that will occur after the allocation of sites.

31. How should windfall development be taken into account in the GNLP?

Public Concern about New Development

4.14 Proposals for new development can meet local resistance. Residents can have concerns about the quality of development and ensuring that the impact on infrastructure, local services and the environment is acceptable.

32. What can the GNLP do to address negative perceptions about development?

33. Are JCS policies 2, 3 & 6 on the quality of design and supporting infrastructure requirements still appropriate?

Design and Space Standards in new homes

4.15 There is evidence that Britain builds some of the smallest homes in Europe, and that some people are dissuaded from choosing new build properties because of cramped rooms and lack of adequate storage⁹. LPAs have discretion to prescribe internal space standards for new homes but this has to be evidenced. Likewise, on the accessibility standards for disabled people, the onus is on the LPA to justify a higher requirement than national standards. Norwich City Council has policies covering both these issues, in the latter case requiring that 10% of homes on schemes in the city should be built to higher Building Regulations standards for accessible and adaptable dwellings.

⁸ National Planning Policy Framework (NPPF), 2012, paragraph 14 pg. 4

⁹ RIBA, Improving Housing Quality: Unlocking the Market,
<https://www.architecture.com/Files/RIBAHoldings/PolicyAndInternationalRelations/Policy/Housing/ImprovingHousingQuality.pdf>

4.16 At present Policy 3 of the JCS sets design quality requirements for homes on larger schemes based on Building for Life requirements, which has now been superseded by BfL12.¹⁰

34. How can the GNLP increase the space standards in new homes and the design quality of new development without making the new homes financially unviable?

¹⁰ Joint Core Strategy, page 38

Section 5 – The Economy

Jobs needs

5.1 JCS Objective 3 is to promote economic growth and diversity, with a plan target of 27,000 additional jobs.

5.2 The Greater Norwich City Deal, which seeks to secure major new investment at the Norwich Research Park (NRP), Hethel Engineering Centre, Norwich city centre and Norwich International Airport, is intended to create more than 13,000 additional jobs above JCS targets. These additional jobs are intended to be delivered by growing high value sectors of R&D around health, agri-tech and environmental sciences; advanced manufacturing and engineering; and, digital creative.

5.3 Economic evidence to support the JCS was collected pre-recession and used to inform the allocation of land for employment development and the amount of office growth required. New evidence will be commissioned to support GNLP policy development.

5.4 The East of England Forecasting Model (<http://www.cambridgeshireinsight.org.uk/EEFM>) provides some recent evidence through its economic forecasts. The latest 2015-based projections were published recently. The EEFM baseline forecast can be considered as “business as usual”. The 2015 run suggests that:

- Growth in the JCS period (2008-2026) could be less than planned at around 22,000 jobs. This is largely due to the jobs decline in the period immediately after 2008 (between the low point in 2011 and 2026 forecast growth is around 30,000 jobs);
- Under “business as usual”, very little growth is forecast in the sectors targeted by the City Deal. Consequently, any growth that can be delivered in these sectors will be additional to baseline forecasts.

35. How can we achieve these levels of growth?

36. If they are not realistic, what might the alternatives be?

Norwich City Centre

5.5 Norwich city centre plays a fundamental and wide ranging role in the area’s economy, and its success is key to promoting inward investment into Greater Norwich as a whole. It is the largest location for employment, retailing and leisure uses in the region, as well as being a significant visitor attraction and a transport hub. It has the potential to expand and enhance these roles, with a number of brownfield sites available for development, and area wide regeneration opportunities.

5.6 The NPPF places a strong focus on protecting the vitality of town centres. The JCS identifies the city centre as the main focus for employment development to keep the city centre vibrant and successful, promoting expansion of the office, retail, cultural, tourism, leisure and education sectors. The considerable potential for growth of the digital creative sector is highlighted in the City Deal. The JCS also promotes housebuilding to support city centre vitality.

5.7 A rapid growth in the education, café, restaurant and bar sectors since 2008 has enhanced vitality. The city centre's retail sector remains one of the strongest nationally although the expansion promoted by the JCS has not taken place.

5.8 The vitality of the city centre has also been enhanced by significant residential development, including student accommodation. Housing led regeneration of the King Street area is progressing and there is potential for significant mixed use developments elsewhere in the centre.

5.9 In recent years there has been limited new office development and some allocated office sites are being proposed for other forms of development. Discussions with local market experts suggest that these trends may be due to:

- Current low rental values and the ready supply of budget accommodation limiting the prospect of large scale office building and favouring residential conversion, which no longer requires planning permission; and
- expansion in mobile working reducing the need for large scale office accommodation.

5.10 The possible development of a Norwich City Centre Strategy, produced in collaboration with businesses, has been identified. The aim of the strategy would be to help deliver the local plan, promote investment, access funding opportunities and promote development to further improve the attractiveness of the city centre as a place to shop, work, live and do business in.

37. How can the GNLP maintain and enhance the role of Norwich city centre and encourage new jobs, investment and development?
--

Strategic Employment Locations

5.11 The NPPF requires local plans to set out a clear strategy identifying suitable sites and areas for business investment, responding to predicted changes in different market sectors and avoiding the long-term safeguarding of land for employment purposes which is unlikely to be required.

5.12 The JCS provides for large scale employment development in strategic locations within the Norwich Policy Area at Thorpe St Andrew, Longwater, Rackheath, Hethel, Norwich International Airport, Norwich Research Park (NRP) – which, as of April 2016, has Enterprise Zone status – and Wymondham, as well as smaller scale growth at Long Stratton (see figure 6 below).

5.13 More recently, Food Enterprise Zone status has been granted to the Greater Norwich Food Cluster in the Easton/NRP areas to the west of Norwich to promote the food, drink and agricultural sectors and associated research.

5.14 An A11 Technology Corridor initiative has been developed over the past 18 months. The project aims to create up to 10,000 new jobs and attract nearly £1bn of private investment by 2031. There will be a focus on developing at least 11 key employment areas along the route in South Norfolk, Breckland, Forest Heath and East Cambridgeshire, including development of a Technology Park at Hethel and the development of 20 hectares of allocated land at Browick Road, Wymondham.

5.16 The GNLP will need effective policies catering for the needs of key sectors to support enterprise and innovation, in particular within those knowledge intensive industries targeted for significant job growth in the City Deal. Policies will need to encourage businesses to expand and change, and increase the attractiveness of the area for inward investment.

38. How and where can GNLP policies best meet employment land needs?

39. Should any existing or allocated employment sites be re-allocated for other purposes?

Towns, villages and rural areas

5.17 The JCS supports economic growth in market towns and revitalising the rural economy.

5.18 Policy 13 classifies Aylsham, Diss, Harleston and Wymondham as **Main Towns**. The first three are identified for modest growth in employment uses, whilst Wymondham, within the NPA and with good transport links, is identified for larger scale employment growth, including 20 hectares of new employment land.

5.19 Policy 14 identifies Acle, Blofield, Brundall Hethersett, Hingham, Loddon/Chedgrave, Long Stratton, Poringland/Framingham Earl, Reepham and Wroxham as **Key Service Centres**. Apart from Long Stratton, which is identified for more significant growth, the Key Service Centres are expected to accommodate limited growth, with existing shops and services protected and local employment opportunities promoted.

5.20 Norfolk County Council's Market Towns Report 2015¹¹ showed that most of the market towns in the area have experienced a fall in retail vacancies and are performing better than they have been for a number of years.

40. How can the GNLP best realise the economic potential of towns, villages and the rural areas?

41. What could the GNLP do to help protect and enhance town and village centres?

The Further and Higher Education sector

5.21 The JCS promotes development of education institutions in the area including the University of East Anglia (UEA), Norwich University of the Arts (NUA), City College and Easton & Otley College to offer educational opportunities and as a catalyst for economic growth in the area.

42. How can the GNLP help meet the future development plans and needs of Further and Higher educational establishments and maximise their contribution to the economy?

Links to employment clusters elsewhere

5.22 Significant employment growth is also anticipated in neighbouring districts. Most notably, growth of advanced manufacturing, engineering and agri-tech sectors is planned along the A11 corridor to Cambridge (see paragraph 5.14 above) and further development of off-shore renewable energy industry is anticipated in Great Yarmouth and Waveney.

43. How should the GNLP address opportunities for the Greater Norwich economy presented by economic growth in neighbouring areas?

Culture, tourism and the economy

5.23 The JCS promotes culture as a means of developing the economy, stimulating regeneration and promoting community involvement. This is to be implemented by maintaining and enhancing existing cultural assets and promoting the development of new or improved facilities. With the Broads, Norwich city centre, the market towns and the countryside providing a significant attraction for visitors, the strategy also promotes tourism as a growth sector.

44. Should the GNLP continue with the JCS approach of promoting culture and tourism as economic growth sectors?

¹¹ <https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use/market-towns-report-2015.pdf>

Section 6 – The Environment

Climate Change

6.1 Local Plans are required to contribute to the mitigation of, and adaptation to, climate change.

6.2 Mitigation measures could include: Reducing the need to travel and providing for sustainable transport (this is considered in sections 2 and 3 of this paper); providing for renewable and low carbon energy technologies; providing opportunities for decentralised energy and heating; and promoting low carbon design approached to reduce energy consumption. Adaption could include the provision of Green Infrastructure, flood risk mitigation or water efficiency measures.

Renewable and Low Carbon Energy

6.3 The NPPF states that LPAs should “encourage the use of renewable resources (for example, by the development of renewable energy)” and “have a positive strategy to promote energy from renewable and low carbon sources”¹². It also states that LPAs should consider identifying suitable areas for renewable and low carbon energy sources in their plans, making the criteria used to identify these areas and the scale of development which is considered suitable clear. This would require an evidence study to be produced to identify such areas.

45. Should the GNLPP identify areas suitable for renewable energy development?

6.4 Policy 3 of the JCS requires larger housing developments to provide 10% of their energy from sustainable energy sources and to maximise opportunities for sustainable construction. While changes in government policy require energy efficiency and sustainable construction to be addressed through the national Building Regulations, it currently remains possible for LPAs to set local requirements for a percentage of energy to be produced from sustainable sources.

46. What should the GNLPP do to maximise decentralised energy and heating?

Ecology, Biodiversity, Geodiversity and Green Infrastructure

6.5 Over recent decades Norfolk has seen a significant decline in biodiversity resulting from habitat fragmentation caused by intensive agriculture alongside the development of housing and infrastructure. The key actions to address this issue are: protection of important wildlife sites; proper management of wildlife sites; and, the reconnection and restoration of habitats¹³. Monitoring information for the JCS does show, however, that since the base date of the JCS (2008), there has been a significant increase in the proportion of Sites of Special Scientific Interest in a favourable or recovering condition (from about 50% to about 85%).

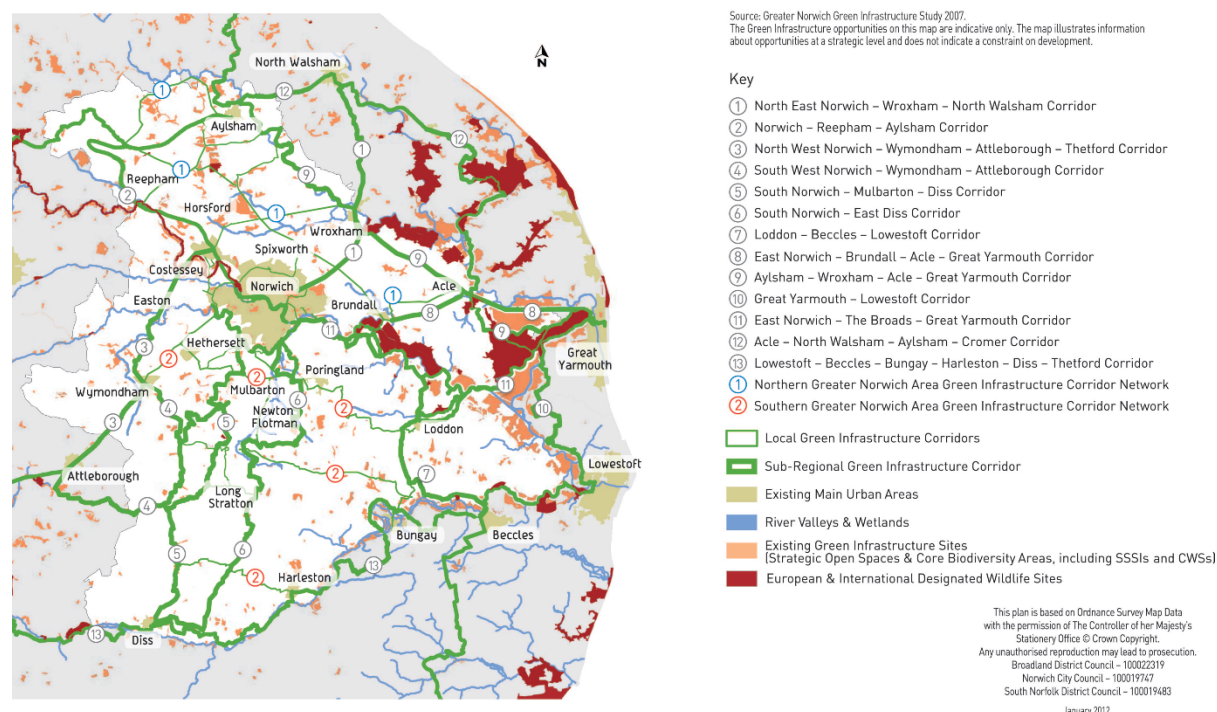
6.6 Policy 1 of the JCS seeks to protect the wealth of important wildlife sites in Greater Norwich. The reconnection of habitats is supported by the Green Infrastructure (GI) Strategy for Greater Norwich (see figure 7 below). Delivered through a combination of on-site developer contributions, planning obligations and conditions, and other funding, including Community Infrastructure Levy (CIL) funding, the GI strategy will improve connections between important wildlife sites through the protection and enhancement of a defined network of multifunctional green spaces. The GI strategy also performs an important role in climate change adaptation: providing cooling and shading in urban areas; helping to manage surface water by reducing the rate and volume of run-off; and providing a more vegetated and permeable landscape helping wildlife adapt to a changing climate.

¹² NPPF, paragraph 17, page 5 and paragraph 97, page 22.

¹³ Making Space for Wildlife and People: Creating an Ecological Network for Norfolk, Norfolk Biodiversity Partnership, 2005

6.7 Significant areas of new publically accessible green space provided as part of the GI Strategy, including the recently opened Harrisons Woodland, are expected to mitigate increased recreational pressure on protected habitats and species. Some stakeholders remain concerned, however, that there needs to be greater monitoring and management of protected sites, and mitigation plans in the event that detrimental impact is found to be occurring, to ensure effective protection.

Figure 7 The JCS proposed Green Infrastructure network for Greater Norwich



6.8 As well as biodiversity assets there are also geodiversity assets across Greater Norwich.

47. Will the GI Strategy adequately address growth pressures?

48. What should be done to protect geodiversity?

Minimising Flood Risk

6.9 The main sources of flood risk¹⁴ in the Greater Norwich area are identified as: flooding from the River Wensum in Norwich, the River Bure and Camping Beck at Buxton; combined river and tidal flooding in Wroxham/Hoveton and Brundall; failure or overwhelming of pumping stations causing localised flooding in Wymondham, Aylsham, and Upton; breaching/failure of embankments in Norwich; and surface water and sewer flooding in a range of places. By 2100 the largest increase in flood risk from rivers is predicted to be in Norwich.

6.10 In respect of other sources of flooding, such as surface water, ground water and ordinary water courses, no *nationally significant* indicative Flood Risk Areas have been identified in the Greater Norwich area by the Environment Agency. However, Norwich was identified as having approximately 14,000 people at risk of surface water flooding and was ranked 19th in a list of English settlements outside the indicative Flood Risk Areas¹⁵.

¹⁴ Broadland Rivers Catchment Flood Management Plan

¹⁵ Norfolk Preliminary Flood Risk Assessment, 2011

6.11 Potential measures to mitigate for and adapt to this risk are identified in the Norfolk Local Flood Risk Management Strategy. Such mitigation measures include retrofitting sustainable drainage (SuDS), flood defences, increased capacity and conveyance of drainage systems and improved land management practices¹⁶.

6.12 Policy 1 of the JCS requires development to “be located to minimise flood risk, mitigating any such risk through design and implementing sustainable drainage”. This policy is augmented by more detailed development management policies for each of the three Greater Norwich authorities which provide detail on how developers should address issues of flood risk within development proposals and planning applications. JCS monitoring shows that since 2011/12, there have been no instances in Greater Norwich of planning permissions being granted in an area of fluvial flood risk contrary to the Environment Agency’s advice.

6.13 In terms of evidence to support the GNLP, the Greater Norwich authorities continue to work with the lead local flood authority and the Environment Agency to identify where updating of the Strategic Flood Risk Assessment is necessary.

49. Does the existing strategy adequately manage flood risk and should this approach be carried forward?

Water Resources and Water Efficiency

6.14 Anglian Water’s Resource Management Planning predicts large water supply deficits in the Norwich and the Broads Resource Zone, which serves much of Greater Norwich. This is a result of the need to reduce the amount of water taken from the River Wensum¹⁷. To address this issue, £18.9 million of investment is planned between 2015 and 2020 on a scheme to relocate the abstraction point on the Wensum from Costessey to Heigham. Further investment of £5.5 million in metering and £1.3 million on water efficiency is also planned.

6.15 The Water Resource Management Plan also contains longer term proposals for the Norwich and the Broads Water Resource Zone to reduce leakage and investigate alternative sources of water supply from 2035/40, which may include water re-use, involving treating waste water to a high standard before pumping it upstream to support further abstraction from the River Wensum.

6.16 To complement efforts by Anglian Water to reduce water use in the existing housing, JCS policy 3 requires new development to be as water efficient as nationally set housing standards allow¹⁸ and restricts the release of land for development unless sufficient water supply infrastructure exists.

50. Is the existing JCS policy for water efficiency appropriate?

Water Quality and Waste Water Disposal

6.17 The European Water Framework Directive seeks to reverse deterioration of water quality and to improve environmental standards.¹⁹ The aim is for each inland and coastal water area to achieve at least Good Ecological Status over a range of different timescales between 2015 and 2027.

6.18 Water abstraction, waste water disposal and run-off from agricultural processes all impact on water quality, including that within the Broads. In terms of disposal, there are fourteen Wastewater Treatment Works in Greater Norwich. Significant parts of Greater Norwich are served by the Whitlingham

¹⁶ <http://norfolkcc.cmis.uk.com/norfolkcc/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/401/Committee/18/Default.aspx>

¹⁷ Joint Nature Conservation Committee, River Wensum, <http://jncc.defra.gov.uk/protectedsites/sacselection/sac.asp?EUCode=UK0012647>

¹⁸ GNGB, Water Efficiency Advice Note <http://www.greaternorwichgrowth.org.uk/document-search/>

¹⁹ The EU Water Framework Directive - Integrated River Basin Management for Europe http://ec.europa.eu/environment/water/water-framework/index_en.html

works, to the east of Norwich, which discharges water into the tidal River Yare. Other treatment works, with the rivers they discharge into, are at:

- Acle-Damgate, Aylsham, Belaugh (River Bure);
- Rackheath (Dobbs Beck, a tributary of the Bure);
- Diss and Harleston (River Waveney);
- Long Stratton (Hempnall Beck);
- Sisland and Poringland (River Chet);
- Reepham (Blackwater Drain, a tributary of the Wensum);
- Stoke Holy Cross (River Tas);
- Swardeston Common (Intwood Stream, a tributary of the Yare); and
- Wymondham (River Tiffey).²⁰

6.19 Capacity for the treatment of waste water varies across the area. In some locations there is ample capacity relative to current demand and coping with increased demand from new development is less of an issue. In other locations, such as Long Stratton, demand and capacity are much closer.

6.20 Policy 3 of the JCS states that “the release of land for development will be dependent on there being sufficient water infrastructure to ... ensure water quality is protected or improved, with no significant detriment to area of environmental importance”.

51. Are the existing policies of the JCS adequate to protect water quality?

52. Are there any locations where growth is restricted by the capacity of the waste water treatment works?

Air Quality, Noise and Light

6.21 Local authorities are responsible for declaring places where air quality falls below target levels. In 2012 Norwich City Council declared an AQMA for the whole of central Norwich within the Inner Ring Road. This holistic approach to reducing pollution levels has been effective in bringing nitrogen dioxide levels down. Efforts continue to divert non-essential traffic from the city centre, provide more bus lanes, add cycle routes, and monitor the use of the Park & Ride facilities²¹. Outside central Norwich there are no Air Quality Management Areas. There is an AQMA in Hoveton, which is just outside the boundary of the study area. Hoveton (in North Norfolk) and Wroxham (in Broadland) are separated by the River Bure. Therefore, development in Wroxham may impact on the air quality of Hoveton, and the air quality in Hoveton may impact on the residents of Wroxham.

6.22 Local Plans can set specific noise standards for new development, but these should not become “fixed thresholds”²² and should be weighed together against other economic, social and environmental considerations. Mechanisms to minimise noise impact include building design and layout choices, controlling the times of day noise is emitted or installing mechanical ventilation systems in affected homes.

6.23 Known sources of noise disturbance in Greater Norwich relate to the operation of Norwich Airport and road traffic, especially on trunk roads. The Northern Distributor Road (NDR) will also be a source of noise disturbance. On a more localised scale some industrial activities can also generate noise issues. Noise is also an ecological concern as some species can be susceptible to noise disturbance.

²⁰ Greater Norwich Development Partnership

Stage 2b Water Cycle Study, 2010 <http://www.greaternorwichgrowth.org.uk/>

²¹ Norwich City Council, Air quality monitoring reports and assessments

https://www.norwich.gov.uk/downloads/file/3020/2015_air_quality_action_plan

²² Planning Practice Guidance, Reference ID: 30-010-20140306

6.24 Light pollution can affect people, wildlife and the tranquillity of naturally dark landscapes.

53. How can the GNLP help to improve air quality and reduce noise pollution?

54. What should the GNLP do to prevent increases in light pollution?

Agricultural Land and Soil Protection

6.25 Agricultural land and soil is a finite natural resource and farming is a major industry locally. National planning policy seeks to protect the best and most versatile grade 1 (excellent), grade 2 (very good) and grade 3a (good) agricultural land from development²³. The largest concentrations of grades 1 and 2 land in Greater Norwich are in the east of the area between Thorpe St. Andrew and Acle. Where development is necessary on green field sites, the preference should be to build on the lower grades: grade 3b (moderate), grade 4 (poor), and grade 5 (very poor), before using sites of higher grade.

55. How should the GNLP minimise impact on high quality agricultural land?

Heritage, Landscape Value and Amenity

6.26 The landscape of Greater Norwich is predominantly rural with large areas of low lying arable land, smaller occurrences of pasture farmland and numerous woodlands and plantations.

6.27 Particular sensitivities within the Greater Norwich Landscape include preserving the setting and integrity of areas of historic parkland²⁴, protecting the landscape of the Yare valley²⁵ and maintaining separation between distinct settlements.

56. What parts of the Greater Norwich landscape do you consider to be of particular heritage, landscape or amenity value and how can the GNLP best preserve and enhance areas?

²³ Agricultural Land Classification: protecting the best and most versatile agricultural land (TIN049)

<http://publications.naturalengland.org.uk/publication/35012>

²⁴ Broadland Landscape Character Assessment SPD, paragraph 1.2.2, page 1 http://www.broadland.gov.uk/housing_and_planning/618.asp

²⁵ South Norfolk Local Landscape Designations Review 2012 http://www.south-norfolk.gov.uk/planning/media/11115101R_Final_DW_06-12.pdf

Report to	Sustainable development panel	Item
	28 September 2016	
Report of	Director of regeneration and development	6
Subject	Annual carbon footprint exercise	

Purpose

This report informs members of the outcomes of the annual carbon footprint exercise.

Recommendation

To note the report.

Corporate and service priorities

The report helps to meet the corporate priorities of as safe, clean and low carbon city

Financial implications

Within existing budgets.

Ward/s: All wards

Cabinet member: Councillor Bremner – Environment and sustainable development

Contact officers

Dave Moorcroft, director of regeneration and development	01603 212226
--	--------------

Richard Willson, environmental strategy manager	01603 212312
---	--------------

Claire Tullett, environmental strategy officer	01603 212545
--	--------------

Background documents

None.

Report

1. All local authorities are required to annually report their emissions to central government. By using a carbon conversion factor, emissions from vehicle use (litres/km) and gas and electricity (kWh) use can be directly compared and the amount of emissions reported as kgCO₂e emitted. The council's annual carbon footprint report, as submitted to central government, can be found at Appendix A.
2. There have been requests in previous years that officers present the council's energy consumption (kWh, litres/km) alongside the carbon emissions figures (kgCO₂e). Therefore both sets of figures have been provided in this report with the understanding that although these figures are related, they are not directly comparable due to the use of carbon conversion factors which are influenced by factors at a national level.
3. Defra advise organisations reporting voluntarily to use kgCO₂e as this is the most comprehensive way to report an organisations impact. The 'e' in CO₂e signifies that CO₂ plus the other Kyoto gases in CO₂ equivalent (kgCO₂, kgCH₄ or kgN₂O) are incorporated into the conversion factor value.

The headlines:

4. Over the period 1 April 2015 to 31 March 2016 the council reduced its carbon dioxide emissions by 8.7%, or 673,992 kg of CO₂e, or nearly 674 tonnes. Or, in more tangible terms, the council reduced our carbon emissions this year by sufficient to fill over 4 thousand double-decker buses. This brings the total reduction, against a 2007 baseline, to 39.5% and brings us close to achieving the 40% carbon emissions reduction target set in the council's 2015-2018 environmental strategy.
5. Table 1 (below) gives an overview of the figures for the 2015-16 period. The data is split into Scopes as dictated by the DECC/DEFRA carbon footprint requirements. Further detail of what is included in each scope is given in paragraph 7.
6. The third column of Table 1 shows the amount of energy use either in kWh, litres of fuel used or km travelled. The fourth column shows this year's figures as a percentage increase or decrease against a 3 year average from 2012-15. This is in order to allow for one off anomalies in reporting. The fifth column shows the amount of carbon emissions produced by each factor of each scope in the 2015-16 period. Finally, the sixth column shows this year's figures as a percentage increase or decrease against a 3 year average from 2012-15.

7. Table 1 - Data by scope:

Scope	Detail	2015-16 energy use	Inc/ dec on 3 year average (2012-15)	2015-16 carbon emissions (kgCO ₂ e)	Inc/ dec on 3 year average (2012-15)
1	Gas council owned buildings	13,243,545 (kWh)	Decrease (18.9%)	2,442,772 (kgCO ₂ e)	Decrease (18.5%)
	Gas contractors	79,553 (kWh)	Decrease (30.7%)	14,674 (kgCO ₂ e)	Decrease (30.7%)
	Fuel council managed vehicles	15,637 (litres)	Decrease (45.6%)	42,278 (kgCO ₂ e)	Decrease (17.2%)
	Total Scope 1 emissions (kgCO ₂ e)			2,499,724	
2	Electricity council owned buildings	7,117,475 (kWh)	Decrease (5.1%)	3,303,732 (kgCO ₂ e)	Decrease (10.6%)
	Electricity contractors	279,653 (kWh)	Decrease (1.41%)	129,253 (kgCO ₂ e)	Decrease (10.5%)
	Total Scope 2 emissions (kgCO ₂ e)			3,432,985	
3	Grey fleet (km)	87,361 (km)	Decrease (7.3%)	16,722 (kgCO ₂ e)	Increase (13.2%)
	Public transport (km)	45,901 (km)	Decrease (40%)	3,759 (kgCO ₂ e)	Decrease (56.5%)
	Contractors data (km)	765,955 (km)	Increase (19.2%)	1,111,234 (kgCO ₂ e)	Decrease (19.1%)
	Total Scope 3 emissions (kgCO ₂ e)			1,131,715	
	Total emissions – All Scopes (kgCO ₂ e)			7,064,424	

8. Scope 1 emissions:

Process emissions (owned buildings)

- Data obtained from utility bills (kWh)

Process emissions (contractor-operated buildings)

- Data obtained from contractor's energy records (kWh)

Fuel use (owned vehicles)

- Data obtained from fuel invoices (litres)

Gas consumption – council owned buildings (kWh):

9. Overall there has been an 18.5% decrease in gas use across council owned assets when compared with the average of the previous 3 years. The trend is for a year on year reduction since 2007 as shown in Chart 1.
10. In particular, there is clear evidence that energy saving projects across our Sheltered Housing stock have resulted in a reduction in gas use over the past 12 months. In 2014, it was identified during the production of the Carbon Management Plan phase 2 that Sheltered Housing schemes are one of the council's highest gas users. This is due to the age and vulnerability of residents who often require the heating on for much of the year due to health-related issues. Officers and partners have worked sensitively to ensure that vulnerable residents continue to live in homes where they feel cosy and comfortable. Our projects in these schemes have included: boiler replacement, burner management trials, boiler valve insulation, loft pipework insulation and underground pipework insulation.
11. The council continues to work with our partners, NPS, to look for future opportunities, and this year we will be installing loft-space pipework insulation at Bradecroft, Seabrook and Harry Perry Sheltered Housing schemes, as well as Endothermic solution to heating systems. In addition we will be fitting Valve and Flange insulation in boiler houses.
12. One contributing factor to the reduction in gas consumption this year is the closure of 3 sheltered housing schemes over the period of time in question. This is considered in greater detail in paragraph's 34 and 35 later in this report.
13. Finally, this year's gas consumption figure will have been favourably affected by the mild winter experienced in 2015/16 as less energy will have been required to heat living spaces or hot water.

Gas consumption – contractors (kWh):

14. In the period 2015/16 there was an overall reduction in gas use by contractors of 30% against an average of the previous 3 years. We continue to work with contractors to monitor their energy use, but we do not monitor their data for them and rely upon contractors to provide accurate data. The data provided in the past has on occasion proven inaccurate and therefore this skews the figure resulting in a larger average reduction in kWh use over the past 3 years.

Fuel use in council managed vehicles:

15. There was an increase of 34% on petrol fuelled pool cars against the previous 3 year average figure. Conversely, there was a 49% decrease in diesel fuelled pool car use. The environmental strategy team is currently working closely with the transformation team to monitor use of the council's fleet and it is anticipated that the outcome of this work will be to reduce the size of the council's pool fleet. For local journeys, as an alternative to pool car and taxi use, the team introduced pool bikes in 2012 and most recently an electric bike has been added to the bike fleet.

16. Scope 2 emissions:

Electricity emissions (own buildings)

- Data obtained from utility bills (kWh)

Electricity emissions (contractor-operated buildings)

- Data obtained from contractor's energy records (kWh)

Electricity consumption – council owned buildings:

17. There was a decrease of electricity consumption in kWh of 5.6% across the council's portfolio of properties compared to the three year average figure. However, when we consider the carbon reduction figure (kgCO₂e) for the same period this shows a saving of 10.6% against a three year average. This is due to the carbon conversion factor which we are required by DECC/DEFRA to use when reporting the annual carbon footprint of the council. The 'carbon conversion factor' section below gives more details on this.
18. Officers continue to work with NPS to look for further opportunities to reduce this figure further. We have implemented a wide range of electricity saving projects across our portfolio since 2008 and it is becoming more challenging to find new opportunities. However, 3 variable speed drives have just been installed at Riverside leisure centre, and officers are investigating the replacement of lighting with LED lighting at car parks, churchyards and Riverside swimming pool. We are currently looking for a suitable low energy alternative for the events lighting at City Hall. In addition, we are looking to install VSD's in several sheltered housing schemes this year, as well as LED upgrades to some Landlord Lighting.
19. The council does purchase its electricity through a green tariff with Scottish and Southern Electricity (SSE). However, historically the tariff has not complied with strict Ofgem Green Supply Guidelines which would have enabled the council to claim the CO₂e reduction in the council's carbon footprint. We've spent some time investigating the merits of changing provider/tariff to a 'greener' provider. We've also been in contact with Ofgem, DECC and Carbon Smart to attempt to find a definitive answer as to whether there are any tariffs or mechanisms available that would enable the council to capture the carbon reduction gained. Sadly reports are currently very confusing. However, this is something we will

continue to pursue. It is important we avoid double-counting carbon emissions reductions by benefitting from them a national grid level and again at a local user level.

Contractor's electricity use (kWh):

20. This year has seen a significant decrease of a third in electricity use by contractors. In past years our figures have been impacted by a lack of consistent reporting and this may be the reason for significant decreases this year when using an average figure. Equally the contractors we work with are not always the same each year, and are only able to work on a best guess estimate of what percentage of their total contracts are due to working on behalf of Norwich City Council.

Carbon Conversion Factor:

21. The carbon conversion factor allows litres of fuel used, km travelled and kWh of energy burned to be compared to one another by measuring the carbon emissions produced during each activity. Carbon emissions are measured in kg of CO₂e.
22. In 2014 DECC/ DEFRA updated their kgCO₂e conversion factor. Instead of using a 5 year rolling average figure for electricity reporting they now use a 1 year average figure. The reason for the change was to make reporting easier for large FTSE 100 companies who report energy use on a frequent basis.
23. However, the 1 year factor is recognised as being more sensitive to national grid level energy mix changes. This sensitivity impacts the annual conversion factor and therefore the council's annual carbon reduction figure. In years where there is an increase in coal-powered electricity in the grid the conversion factor will be such that it will create an increase in electricity associated carbon emissions at a local level. Conversely, in years where more renewable technology produced electricity is put into the national grid, there will be a corresponding decrease in carbon emissions associated with electricity use at a local level.
24. This factor is outside of the council's control, but does affect our annual carbon emissions figure quite profoundly. The council's efforts to reduce the energy use through the introduction of energy efficient technologies and behaviour change will either, a) compound any changes in the national grid energy mix which assist with 'greening the grid', thereby further reducing emissions, or b) help to counterbalance changes in the national energy mix which may lead to an increase in carbon emissions at a grid level. We may be 'winners' some years and 'losers' in other years. In order to provide a more accurate picture for members it is intended continue to provide the energy use data e.g. kWh, litres fuel consumed, km travelled alongside the carbon emissions data.

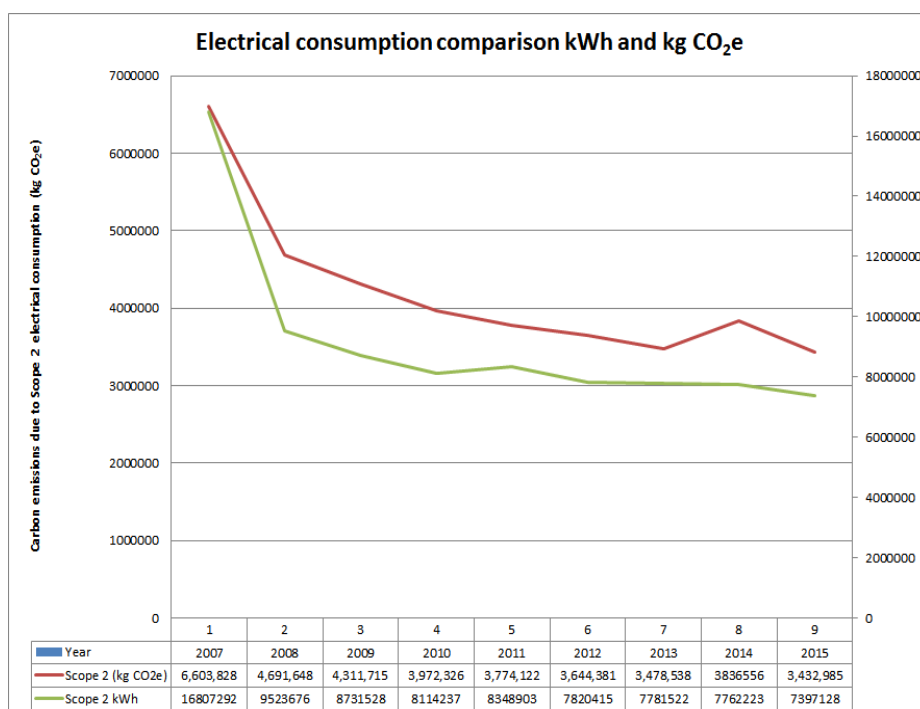
An illustration of the electricity carbon conversion effect:

25. In the 2014 conversion factor guidance DEFRA noted, "There was an 11% increase in the UK electricity factor from the previous year because there was a

significant increase in coal-powered electricity generation share in 2012 (the inventory year for which the 2014 GHG Conversion Factor was derived)."

26. Graph A (below) shows the nearly consistent drop in Scope 2 electricity use in kWh (bottom line) against the trend for electricity related carbon emissions (top line). Of interest is the peak in 2014 in carbon emissions. This is due, at least in part, to the increase in the amount of carbon intensive coal-powered electricity in 2012 affecting the 2014 conversion factor.

27. Graph A – Electricity use (kWh) vs Electricity use (kg CO₂e)



28. DECC have stated that in 2013 (the inventory year for which the 2015 GHG Conversion Factor was derived), "the electricity generated from renewable sources in the UK in 2013 increased by 30% on 2012, and accounted for 14.9% of total UK generation, up from 11.3% in 2012" (Digest of UK Energy Statistics 2014). This 'greening of the grid' has caused the conversion factor for carbon emissions relating to electrical use to drop by 7% against last year. This is reflected both in the council's Scope 2 emissions reduction and therefore the overall carbon footprint of the council this year.

29. Scope 3 emissions:

Business travel (grey fleet and contractor)

- Data taken from officer and member business mileage claim forms (km)
- Data taken from contractor business mileage records (km)

Public transport

- Data taken from officer and member business mileage claim forms (km)

- Data for train journeys taken from rail account invoices (km)

Fuel use in contractor vehicles

- Data obtained from contractor fuel records (litres)

Grey Fleet:

30. The grey fleet is where staff use their own cars for business miles. There has been a 7.3% decrease in grey fleet use this year, and this may correlate to the increase in the use of petrol fuelled pool cars, but this is likely to be an over-simplification and it requires further investigation.

Public transport:

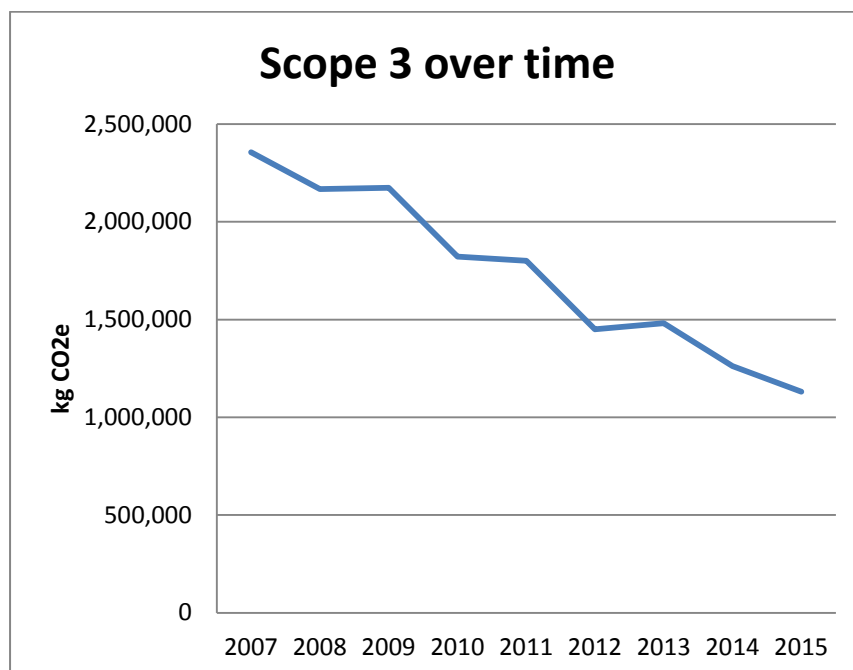
31. This year has seen a large decrease in the amount of taxi travel which we believe to be erroneous. We have disputed this with our provider but have been advised the data provided is correct. We are working to resolve the problem for next year's report. Rail travel remains largely the same as last year and air travel has decreased since last year with all flights taken during the period being domestic UK flights.

Contractor's fleet:

32. There has been a significant increase in contractor's diesel consumption this year, and a small increase in petrol use. This is in part due to contractor's working on additional projects, but also due to under-reporting from one major contractor which has skewed the comparison figures for last year and this year. This has highlighted the continuous need for ongoing monitoring and liaison between the council and our contractors.

33. Graph B (below) shows that whilst the overall trend over time is for a reduction in Scope 3 emissions, that these can be quite volatile as shown by the series of peaks on the graph. This is thought to be largely to many of the factors being outside of the council's direct control and the variability in staff travel requirements and the requirements of contracts year on year.

Graph B – Scope 3 emissions over time:



Further factors to consider:

Building rationalisation and change of responsibility:

34. In 2015/16 a number of assets this year were either vacated or responsibility for energy bills moved to a new tenant. Where this occurred, it resulted in an immediate and reduction in the council's carbon emissions for the asset.

35. This year this includes:

- Mile Cross depot – final staff moved out – the first full year's figures.
- Britannia Court sheltered housing scheme – closed
- Lakenfields sheltered housing scheme responsibility transferred to St Martins Housing trust
- St James sheltered housing scheme has been subject to refurbishment for much of the period in question. When it re-opens we anticipate it will be more energy efficient than previously due to energy efficiency measures implemented during refurbishment.
- The Guildhall responsibility transferred to HEART and has therefore been taken from our carbon footprint.
- West Norwich Area Housing Office – officers have moved into City Hall
- Mile Cross Area Housing Office – officers have moved into City Hall

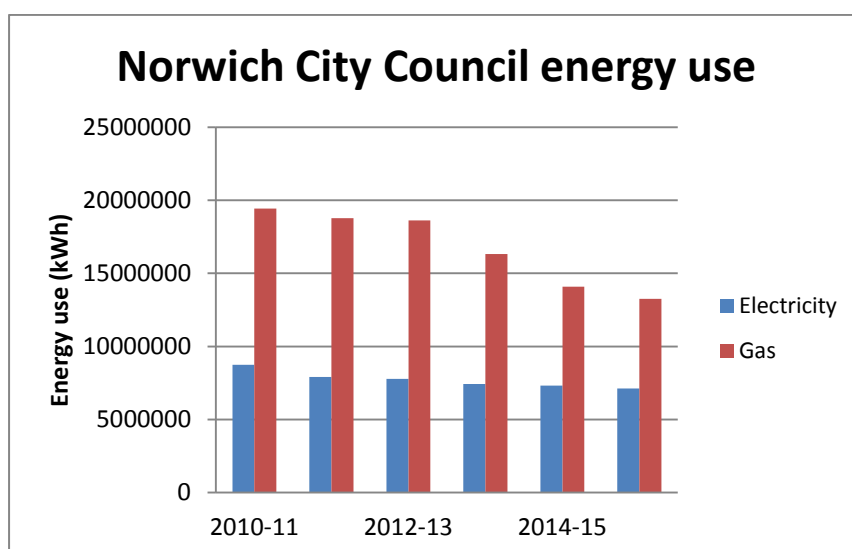
Variability:

36. By using the DECC/DEFRA 2015 carbon conversion factor the resulting drop in Norwich City Council's carbon emissions is reckoned to be 8.7% for the 2015/16 period.
37. By using the National Indicator (NI) 185 spreadsheet provided by DECC in 2008 and in which we have historically gathered our data, (but which does not use the carbon conversion factor), the carbon emissions this year over all 3 scopes are reckoned to have increased by 2%.
38. Historically we have applied a weather correction factor to the NI185 data. This factor allows for smoothing out extremes of temperature on the carbon emissions over all 3 scopes. If we apply the weather correction factor to the data for the period 2015/16 then council emissions have reduced by 5%. This might be the most reliable measurement since it takes into account extremes of temperature and yet is not influenced by mix of electricity at a national level and the corresponding carbon conversion factor. This would bring the current carbon reduction of the council to 35.8% based on a 2007 baseline.
39. In addition, other variables include: the reliability of third party data, the variation in contracts and contractors year on year.
40. Carbon emissions calculation is complex with many variables, and is at best an indication of the council's carbon journey. Whilst it is imperfect it nevertheless remains best practice. Monitoring our carbon emissions and our energy consumption allows the council to prioritise which areas of our operations would most benefit from energy reduction measures and allows us to allocate resources accordingly.

Gas and electricity consumption:

41. If we consider the gas and electricity consumption (kWh) data which is where we have the most control and influence and the most accurate data the long term trend is for a year on year drop in consumption levels as shown in Chart 1 below. This reflects the variety of energy saving projects that have been implemented since 2009.

Chart 1 – Norwich City Council energy use over time:

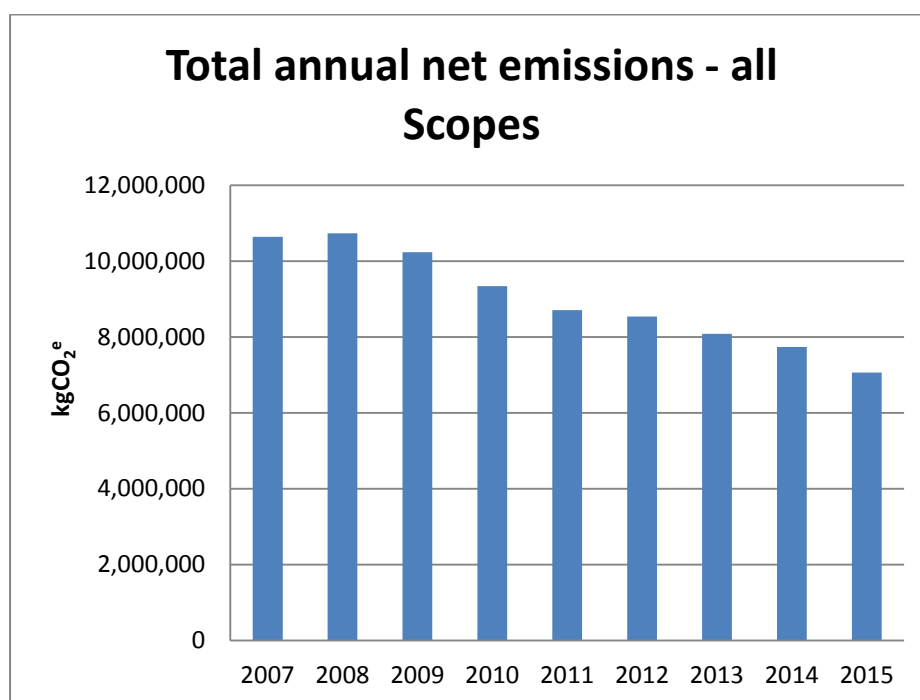


42. The team have worked with our Asset Management partners, NPS, over a number of years to implement a variety of energy saving technologies across our wide and varied assets. Often these have been at least part-funded by Salix funding, an interest free loan scheme for energy reduction projects. A list of these projects can be found in Appendix B of this report.

Conclusion:

43. Chart 2, below, shows a clear trend over time to lowering the council's carbon dioxide emissions, as we move closer to achieving the 40% target.

Chart 2 – Total net emissions – All Scopes:



44. Officers need to continue to work closely with contractors to monitor energy use throughout the year to encourage accurate and timely reporting, allowing discrepancies in data to be highlighted and addressed earlier.
45. Since the baselining exercise undertaken in 2007 the council and its contractors have saved 3,577 tonnes of CO₂e emissions from polluting the environment. This is the equivalent of 3,577 hot air balloons. The environmental strategy team are constantly seeking new opportunities for energy saving opportunities.

Report to	Sustainable development panel	Item
	28 September 2016	
Report of	Director of regeneration and development	7
Subject	Updated Affordable Warmth Strategy	

Purpose

This report informs members of the outcomes of the council's new Affordable Warmth Strategy.

Recommendation

To note the report.

Corporate and service priorities

The report helps to meet the corporate priorities of as safe, clean and low carbon city and prosperous city.

Financial implications

Within existing budgets.

Ward/s: All wards

Cabinet member: Councillor Bremner – Environment and sustainable development
Councillor Thomas – Fairness and Equality

Contact officers

Dave Moorcroft, director of regeneration and development	01603 212226
--	--------------

Richard Willson, environmental strategy manager	01603 212312
---	--------------

Eleanor Carter, affordable warmth officer	01603 212545
---	--------------

Background documents

None.

Report

1. This is an update of the council's existing affordable warmth strategy. One of the council's key corporate priorities within our corporate plan is to 'make Norwich a fair city' and within that we have said we will 'reduce financial and social inequalities' and 'reduce fuel poverty in the city' through a programme of affordable warmth activities. This new affordable warmth strategy provides a framework for our ongoing activities.
2. A fuel poor household is one that cannot afford to keep adequately warm at a reasonable cost. The most widely accepted definition of a fuel poor household is the low income high cost indicator. This means that a household is fuel poor if their fuel costs are above average and if they were to spend that amount they would be left with a residual income below the poverty line.
3. In Norwich we believe that 10.5 per cent of households, or more than one in every 10 are experiencing fuel poverty. That equates to a staggering 6,523 households. In addition, the new welfare reforms such as universal credit and the benefit cap, will impact some of the most vulnerable residents in the city. During times of financial hardship it is even more important that residents are able to maximise their finances to best effect.
4. This updated strategy takes into account the shift in central government policy in regards to the Green Deal, Green Deal HIF (Home Improvement Fund) ECO (Energy Companies Obligation) and HHCR (Home Heating Cost Reduction Obligation) as reported to the sustainable development panel on 13 January 2016.