



NORWICH
City Council

Cabinet

Date: Wednesday, 06 March 2024

Time: 16:30

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

Committee members:

For further information please contact:

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Agenda

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- 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 Public questions/petitions**
To receive questions / petitions from the public which have been submitted in accordance with the council's constitution.
- 4 Questions to cabinet members**
(A copy of the questions and replies will be available on the council's website prior to the meeting)
- 5 Minutes** 5 - 20
To approve the accuracy of the minutes of the meeting held on 7 February 2024.
- 6 Corporate Plan 2024-2029** 21 - 100
Purpose - To consider the new draft corporate plan 2024-2029.
- 7 Adoption of Greater Norwich Local Plan** 101 - 206
Purpose - To consider the outcome of the examination into the Greater Norwich Local Plan (GNLP) and to recommend adoption of the plan.
- 8 Customer and Digital Strategy 2024-2029** 207 - 246
Purpose - To seek approval from cabinet for the Customer and Digital Strategy 2024-29.
- 9 Pay Policy Statement 2024-25** 247 - 260
Purpose - To note and recommend to full council the pay policy statement for 2024/25.
- 10 Funding Approval for Three Carbon Reduction Projects (key decision)** 261 - 266

Purpose - This report advises the council on actions undertaken to deliver on the climate agenda. It keeps members apprised on the recently submitted bid to improve the energy efficiency of the Council's social housing stock. Also due to recent news of a successful solar panel bid and the identification of opportunities to obtain grant funding for an energy heat network business case, we are seeking delegated authority to progress with the development of the business case during the pre-election period.

11 Write-off of irrecoverable debt over £50,000 267 - 272

Purpose - To request write offs for irrecoverable National Non-Domestic (NNDR) debts in excess of £50,000 in accordance with the council's financial regulations, following completion of all available debt recovery options.

12 Contract award for the main contractor for the development at Argyle Street (key decision) 273 - 280

Purpose - To consider the award of a contract relating to the construction of 14 new homes at Argyle Street, Norwich.

13 Response to the recommendations on Retrofitting - (Report to follow)

14 Assets (Non-Housing) Five Year Plan (key decision) 281 - 292

Purpose - To consider the Investment Portfolio Strategy and Implementation plan and endorse the revised asset management action plan appended to this report.

15 Development Site Pipeline (key decision) 293 - 302

Purpose - To consider the development site pipeline.

16 Exclusion of the public

Consideration of exclusion of the public.

EXEMPT ITEMS:

(During consideration of these items the meeting is not likely to be open to the press and the public.)

To consider whether the press and public should be excluded from the meeting during consideration of an agenda item on the grounds that it involves the likely disclosure of exempt information as specified in Part 1 of Schedule 12 A of the Local Government Act 1972 or it being confidential for the purposes of Section 100A(2) of that Act.

In each case, members are asked to decide whether, in all circumstances, the public interest in maintaining the exemption (and discussing the matter in private) outweighs the public interest in disclosing the information.

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***17 Assets (Non Housing) Five Year Plan - (Exempt appendix) (Para 3)**

- This report is not for publication because it would disclose information relating to the financial or business affairs of any particular person (including the authority holding that information) as in para 3 of Schedule 12A to the Local Government Act 1972.

***18 Development Site Pipeline - (Exempt appendix) (Para 3)**

- This report is not for publication because it would disclose information relating to the financial or business affairs of any particular person (including the authority holding that information) as in para 3 of Schedule 12A to the Local Government Act 1972.

Date of publication: **Tuesday, 27 February 2024**



Cabinet

17:30 to 19:00

7 February 2024

Present: Councillors Stonard (chair), Jones (vice-chair), Fulton-McAlister, Giles, Hampton, Kendrick, Kidman and Packer (items 1 – 8).

Also Present: Councillor Galvin (leader of the Green group)

1. Declarations of interest

Councillors Kendrick, Kidman and Stonard declared a pecuniary interest, in relation to item 8, The council's provisional 2024/25 budget and medium-term financial strategy, in that they were council housing or garage tenants. They advised that they had been granted a dispensation from the Monitoring Officer to enable them to take part in the discussion and vote on the item.

2. Public questions/ petitions

There were no public questions.

3. Questions to cabinet members

There were no questions to cabinet members from members of the council.

4. Minutes

RESOLVED to approve the accuracy of the minutes of the meeting held on 17 January 2024.

5. Scrutiny Committee Recommendations

Councillor Stonard referred to the report circulated prior to committee and invited Councillor Ackroyd to introduce the report as the chair of the scrutiny committee.

Councillor Ackroyd emphasised that the budget was an important item to scrutinise and commented that it had been a well attended and interesting meeting with a wide ranging and full discussion. She thanked cabinet members and the chief executive officer for attending and for the patient explanation of questions by finance officers which had increased the committees understanding.

She highlighted that the budget consultation had emerged as a theme within discussions which was illustrated in the recommendations presented in the report. Members of the committee had considered recommendations aimed at increasing participation in consultations. She noted that committee appreciated the assurance

by the leader of the council and the chief executive officer that the consultation process would be considered in the new civic year.

Councillor Giles, cabinet member for communities and social inclusion thanked scrutiny committee for their consideration of the budget and the recommendations made to cabinet. He responded to those largely in relation to consultations, he emphasised that engagement and consultation were crucial ways in which residents were heard. He advised that work had begun at the beginning of this civic year by officers to consider engagement and consultation processes and the recommendations would be referred to this group.

He agreed that the need to register on Get Talking Norwich (GTN) could act as a barrier and noted that most consultations did not include the requirement to register for example the recent corporate plan consultation. He was happy to accept the recommendation in relation to this but noted that exceptions may be needed in cases where the outcome of a consultation could be biased if anonymised. If registration was required, he committed to simplifying the process.

In relation to the recommendation to incorporate demographic profiling questions into the main body of the questions, he welcomed the suggestion and noted that with the corporate plan consultation the questions were asked at the end of the survey with the option to not respond. He agreed that consultations should include a clear statement of intent and the scope of influence which respondents would have.

He considered that feedback was an important part of the consultation process and committed to providing responses to consultations on GTN and noted that providing responses was resource intensive and that it was not possible to provide responses on an individual basis. He advised that there was functionality on GTN to send out newsletters and updates if respondents provided their email address and this did not impact on the ability to respond to a consultation anonymously.

In relation to the recommendation to include consultations in the Equality, Diversity and Inclusion Strategy he expressed that the wording of the recommendation was unclear and welcomed clarification on this. He assumed that it meant to add a question to ensure the sample consultation response was representative of the profile of the city but it was noted that this was a practical challenge in that it would require participants to provide demographic information.

He was interested to explore if deliberative processes would increase participation and would ask officers to consider the feasibility of using a more deliberative process and to investigate if other methods achieved the same aim. In relation to avoiding leading questions he was happy to commit to this. However, he noted that some consultations such as that on the budget required a decision to be made between choices, asking what to prioritise, in these situations a scale of agreement could be used if appropriate.

GTN was an excellent platform but he was aware that there were people still digitally excluded or for whom literacy was an issue. He referred to the recent corporate plan consultation which included significant in person on street engagement with community activities being visited. However, he noted that in person engagement was resource intensive and the council did not have the capacity to do this for every consultation.

Councillor Stonard, the leader of the council responded to the remaining recommendations, he confirmed that clear and jargon free communication was what was aimed for and noted the budget was presented in pictorial form too as a pie chart. In relation to the request for a member briefing on the Future Shape Norwich project he would request that this was arranged by officers.

He referred to the recommendation in relation to a section on NCSL being included in the budget, he advised that Lion Homes was included in the capital strategy element of the budget because it was a significant driver of capital investment. This was not the case with NCSL and why it was not included.

RESOLVED to:

- 1) in principle to remove the requirement to register to access Get Talking Norwich with the caveat that certain consultations may have to be exempted as anonymised responses could bias the outcome. If required agreed to simplify the process;
- 2) add the demographic profiling into the main consultation questions;
- 3) agree that consultations should include a clear statement of intent and what the scope of influence is;
- 4) provide feedback on consultations on Get Talking Norwich;
- 5) avoid leading questions with the caveat that consultations such as that on the budget require a choice to be made in terms of what the priorities are, in these cases to agree to the use of a scale of agreement where appropriate;
- 6) agree where resources allow that in person engagement be considered as a form of mitigation against digital exclusion and literacy rates;
- 7) ask officers to consider the feasibility of using a more deliberative process to increase participation in the decision making process and to investigate if other methods achieve the same aim;
- 8) continue to commit to presenting budget information in a clear and jargon free way; and
- 9) ask officers to arrange a member briefing on the Future Shape Norwich project.

6. Response to Scrutiny Committee Recommendations on Retrofitting

Councillor Stonard leader of the council referred to the recommendations from the scrutiny committee on Retrofitting: Warm, low bills, no carbon: a plan for Norwich's council homes which had been presented to cabinet at the meeting held on 13 December 2023. The responses had been deferred for consideration and Councillor Jones, deputy leader and cabinet member for housing and community safety and Councillor Hampton, cabinet member for climate change provided a verbal update to the meeting.

Councillor Hampton thanked members of the task and finish group, scrutiny committee and officers for the recommendations. It had been a constructive exercise, and she was happy to support the recommendations. She noted that residential emissions were the top source of Norwich's emissions at 33% and investment in retrofitting was essential if the aim to achieve city wide net zero emissions by 2045 was to be achieved.

It was important not to lose sight of the cost of living and energy crises and retrofitting's impact upon this. The council's affordable warmth strategy contained the key principle that retrofitting measures must not exacerbate fuel poverty. The task and finish group had focussed on the council's housing stock and it was important to recognise the need for retrofitting in the private rented sector and for home owners too. Many of the task and finish group recommendations would benefit development in this area such as mitigating against skills and supply chain issues.

The retrofitting actions in the Citywide Climate Action Strategy sought to lead retrofitting work city wide, with a taskforce, digital hub and academy. The council's Environmental Strategy team had accessed national funding to deliver retrofitting schemes for example the Sustainable Warmth competition resulted in the installation of 289 retrofitting measures in low income homes. A bid had been made to for the next wave of Social Housing Decarbonisation Funding and it was hoped that the outcome would be heard shortly.

The Housing Revenue Account Business Plan presented at cabinet in December 2022 committed the council to achieving in its housing stock Energy Performance Certificate Level C by 2030 at the latest and to net zero by 2050. Work to develop a strategy to achieve this had been ongoing including a stock condition survey, consultant work to generate feasibility studies and options analysis and thermographic study of existing measures in homes.

In terms of the recommendations, in reference to adding retrofitting as a theme within the corporate plan, it was set as a priority in the new corporate plan. The Norwich Climate Commission and the Climate and Environment Emergency Executive Panel (CEEEP) having been consulted on the corporate plan as part of the extensive engagement work conducted. This was underpinned in the budget with a Growth Proposal included for Climate Change.

Councillor Hampton noted that many of the recommendations were resource intensive and funding had to be considered in the context of the financial climate of austerity. She agreed with the spirit and principle of the recommendations but there would be an element of prioritisation and the need to lever in external funding or to see a change to the government funding regime if they were to be achieved.

The recommendation to develop a state of readiness was an objective which was always aimed for, the current stock condition survey and identified measures would support this. In terms of the recommendation in relation to training, opportunities which were appropriate to staff's roles would be offered and for councillors training on signposting to existing schemes. On the recommendation to develop a Retrofit Communications Plan and Engagement Strategy this would be addressed via the Citywide Climate Action Strategy (CCAS).

The recommendation for the council to play a leading role within its own estate in terms of retrofitting was one which Councillor Hampton considered the council were already working to achieve. She referred to the 155 solar panels and the air source heat pump installed at city hall and advised that the CCAS recognised the need to use the council's estate as a living lab.

In terms of retrofitting measures in community centres she was keen to see this but advised that it was challenging to access funding for this purpose. Councillor Jones, deputy leader and cabinet member for housing and community safety responded later that for those community centres which sat within the Housing Revenue Account retrofit funding for homes would be prioritised above that for community centres but that she supported the idea to explore other sources of funding.

In reference to municipal bonds now referred to as municipal loans, talks were underway with Abundance and other providers with a view to a scheme being launched. In terms of utilising private sector investment, this was already being explored in relation to large scale heat networks and she was happy to accept this recommendation. On the recommendation on the County Deal, Councillor Hampton noted that this opportunity was gone if indeed it ever really existed as there had been no explicit funding for net zero in the deal. Partnership working benefits would be explored but the council already worked in partnership at County-level on retrofit e.g. Norfolk Climate Change Partnership and Norfolk Warm Homes Partnership.

In terms of ensuring that any contract for delivering retrofitting delivers social value she advised that this was already a requirement of the Social Value Act. However, she agreed in principle noting that it was a useful tool to explore further. The recommendation in relation to skills provision, was work that was acknowledged as required and Norfolk County Council were already assessing skills provision, had commissioned consultants and were working with the Retrofit Academy CIC. As the County Council were the education authority it was appropriate that they led this work. The recommendation on equal opportunities went in tandem with this as there could be no equality without opportunities existing.

In terms of the recommendation in relation to planning, this was a tool which could be used, this had been put into practice with the East Norwich development. The energy supplementary planning document for which set out the policy, principle and guidance for delivering sustainable energy in this strategic development area.

Councillor Hampton concluded by noting that she was comfortable with the majority of recommendations she had referred to which reflected work which was happening or was acknowledged as needing to happen. However, she reminded members that there was a caveat in that all recommendations had to be set in the current context of financial austerity and prioritises would have to be made.

Councillor Jones, deputy leader and cabinet member for housing and community safety emphasised that the council were committed to retrofitting its housing stock as a priority. It was crucial to base these decisions on clear evidence and the current stock condition survey being undertaken would assist with this. There were competing priorities to consider and she could not commit to a specific allocation of resources at this time. It was not possible to commit to accelerate the programme of retrofitting as it was not clear what the result of the stock condition survey would be.

In terms of the recommendations in relation to ensuring sufficient expertise and resources were in place to progress retrofitting. Councillor Jones acknowledged that it was essential to have the right mix of skills and noted that it was necessary to understand what was needed in terms of reviewing the data from the stock condition survey before this could be considered. She looked forward to continuing the discussion once the position was clearer.

In terms of the recommendation to deliver retrofitting services through Lion Homes, Councillor Jones was not adverse to the idea if it achieved best value for the Housing Revenue Account which was the priority. Similarly, in terms of the recommendation to explore retrofitting as an opportunity for NCSL this could be something to discuss in the future. Currently it was important to focus on business as usual in terms of the role that NCSL had.

Councillor Jones concluded by confirming her commitment in principle to the majority of recommendations with the caveat that it was not possible to commit to a timescale for some at present.

Councillor Galvin thanked cabinet members for their response to the recommendations, she advised that the recommendations were considered by a cross party group of members with considerable support from officers. The recommendations were designed to be able to be adopted by council and she was pleased as the chair of the task and finish group that cabinet had accepted the spirit of the recommendations. She commented that it would have been preferable if a written response to the recommendations could have been available before the meeting.

RESOLVED to note the update on the scrutiny committee recommendations on retrofitting and to agree to provide a written response at the March meeting of cabinet.

7. Local Council Tax Reduction Scheme 2024/25

Councillor Giles, cabinet member for communities and social inclusion presented, the report. Council Tax benefit was abolished in 2013 at which time a number of local authorities introduced a minimum council tax payment for benefit claimants. He was pleased that Norwich had maintained a 100% Council Tax Reduction Scheme (CTRS) emphasising that problem debt could increase financial exclusion, add to family breakdown and exacerbate physical and mental health conditions.

He advised that the recommendations proposed had received unanimous support at the cross party Council Tax Working Group and that proposals received from Norfolk County Council including a recommendation for all Norfolk billing authorities to consider setting a cap on Council Tax Support at 75% were rejected. The cost of running the scheme for the financial year 2024/25 was £1.24m a £60,000 increase on the 2023/24 cost. He noted that whilst the recommendation to maintain a 100% CTRS protected vulnerable residents it was also inefficient to spend resource chasing small amounts of payments.

Councillor Jones, deputy leader and cabinet member for housing and community safety commented that the CTRS made a significant difference to people and she

was pleased that even in the context of challenging times for local authorities the council could still continue to offer this support.

In response to a question from Councillor Galvin, Councillor Giles cabinet member for communities and social inclusion advised that additional support was provided to residents identified as vulnerable using the Norfolk Community Advice Network referral system. This allowed referrals to be made to a range of support agencies providing advice in relation to debt and benefits.

RESOLVED to recommend that council:

- 1) retains a maximum 100 per cent LCTRS for working age recipients;
- 2) make the following changes to the LCTRS for 2024/25 by continuing with the 2023/24 scheme with the following annual modifications:
 - (a) to uprate the relevant applicable amounts for 2024/25 and future years by the preceding September CPI figure;
 - (b) to make changes for working-age customers which align with pensioner prescribed changes annually for 2024/25 and future years;
 - (c) to change the scheme annually in accordance with any Prescribed Regulation changes;
 - (d) to retain the £3 + or - tolerance level for changes in income for 2024/25 and future years;
 - (e) to uprate the level of income brackets used to decide non-dependant deductions and level of non-dependant deductions by the preceding September CPI figure;
 - (f) to increase the level of income brackets used to decide entitlement to second adult reduction by the preceding September CPI figure;
 - (g) to retain the maximum household capital limit of £16,000 for 2024/25 and future years.

8. The council's provisional 2024/25 budget and medium-term financial strategy

Councillor Kendrick, cabinet member for resources, presented the report placing the budget in the context of a climate of financial austerity for local authorities with a number recently issuing S114 notices. He was pleased in this situation to be able to propose a balanced budget for 2024/25 without use of reserves and without the level of cuts seen to services at other councils.

He referred to the consultation which had been conducted on the key elements of the budget and noted that responses were lower than expected. He referred to the recommendations from scrutiny committee looking at ways to improve the budget consultation process. He advised that members could take some comfort from the additional and extensive engagement on the corporate plan which would inform

priorities for the future and which had engaged with over 900 individuals and organisations.

He highlighted that there were further savings to be made across the remainder of the Medium Term Financial Strategy (MTFS) and noted that this was unsurprising given the uncertainty in relation to local government funding, continuing growing pressures for services, inflationary factors impacting the funding of services and the imminent General Election.

He referred to the latest budget management report on the agenda and advised that this indicated that there would be no overspending in the current year, whilst 93% of the savings targets agreed for 2023/24 had been delivered, an exceptional achievement in the current financial climate with many local authorities struggling to balance their budgets.

The Local Government Financial Settlement had now been finalised and confirmed that the council would receive an additional £193,000 as a consequence of the government being forced to take heed of the evidence provided by lobbying groups including the District Councils Network.

It was proposed to increase the council's share of council tax by 2.99% which was essential to maintain services both now and into the future. Similarly, the extensive demands of maintaining the council's substantial housing stock and providing more houses into the future led to the need to increase housing rents and service charges in line with the rent setting standard.

Whilst additional resources were welcome and overall the settlement delivered an increase in Core Spending Power of 5.7% compared to 2023/24, there continued to be a challenging financial outlook for local government in the medium term. Prudent and effective financial management and control had provided a solid foundation from which to build. However, he warned against complacency and emphasised the need to continue to maintain these high standards in order to balance the Medium Term Financial Strategy.

Local Government continued to await a revised funding regime, whether for Council Tax or Business Rates to bring funding arrangements into the 21st Century. It was likely that there would be further changes during the course of the current Medium Term Financial Strategy, not least as a consequence of the imminent General Election. It was hoped that a multi-year financial settlement to support longer term financial planning would be provided to local authorities instead of having to rely on the sticking plaster of a funding guarantee.

Despite the challenges faced, the budget proposed required no additional service related savings, did not require the use of one-off reserves to fund on-going expenditure and sought to establish a strong foundation for future service development and improvement, linked to the Corporate Plan. He was pleased to propose the recommendations for approval to full council.

Councillor Giles, cabinet member for communities and social inclusion referred to the benefit that sport and physical activity provided to health and proposed three amendments to the Capital Programme for additional investment in city parks as follows:

- 1) Increase the funding for the play area improvement programme by £1.1m over the period 2024/25 to 2026/27;
- 2) Increase the funding in 2024/25 for the improvement of the changing pavilions at Eaton Park by £0.3m; and
- 3) Increase the funding for sloughbottom park by £0.85m.

The amendments were seconded by Councillor Kidman, cabinet member for wellbeing and culture and following a vote were agreed. Councillor Jones, deputy leader and cabinet member for housing and community safety welcomed the investment in parks commenting that they were essential to a wide range of people.

In response to a question from Councillor Galvin, Councillor Giles advised that the additional investment was funded from Section 106 funding, further support from the football foundation and from the Greater Norwich Growth Board (GNGB) to supplement the resources received from the council's successful levelling up bid.

In relation to the funding from the GNGB this was approved as part of the Greater Norwich draft Five Year Infrastructure Investment Plan 2024-29 considered at the meeting of cabinet on 17 January 2024. There had been no time to incorporate the extra funding into the budget prior to budget scrutiny. The amendments were proposed now because he wanted the funding to be inserted at this time rather than waiting until the middle of the year.

RESOLVED to:

- 1) note the latest financial information, the budget strategy incorporated into the report and the budget proposals, which enable the Council to set a balanced budget for 2024/25 and Medium-Term Financial Strategy for the period to 2028/29;
- 2) note the budget consultation process that was followed and consider, as part of finalising the 2024/25 budget proposals for Council, the feedback as outlined in Section 2, Appendix 2 (E);
- 3) note the Section 7 report of the chief finance officer on the robustness of the budget estimates, the adequacy of reserves, and the key financial risks to the council; and
- 4) note that the Council Tax resolution for 2024/25, prepared in accordance with Sections 32-36 of the Local Government Finance Act 1992 as amended by the Localism Act 2011, will be calculated, and presented to Council for approval once Norfolk County Council and the Office of the Police and Crime Commissioner for Norfolk have agreed the precepts for the next financial year.

Recommend to Council to approve:

General Fund

- (i) The council's net revenue budget requirement as £24.232m for the financial year 2024/25 including the budget allocations to services shown in and the growth proposals set out in Section 2;
- (ii) An increase to Norwich City Council's element of the council tax of 2.99%, meaning that the Band D council tax will be set at £297.22 (Section 2, paragraph 2.15) with the impact of the increase for all bands shown in Section 2, Appendix 2 (D);
- (iii) The prudent minimum level of reserves for the council as £5.4 million (Section 2, paragraph 2.35);
- (iv) The following additional Council Tax premiums be applied as soon as practicable (Section 2, paragraphs 2.21-2.25) in line with the Levelling Up and Regeneration Act 2023;
 - 100% premium for second homes with effect from 1st April 2025;
 - 100% premium for properties which have been empty and unfurnished for a period of between 1 and 5 years from 1st April 2024;
- (v) Delegation to the chief finance officer (S151 Officer) in consultation with the portfolio holder for resources inclusion of any minor changes consequent on the publication of the final local government settlement or subsequent additional grant allocations.

Housing Revenue Account

- (vi) The proposed Housing Revenue Account gross expenditure budget of £72.867m and gross income budgets of £82.969m for 2024/25 (Section 3, paragraph 43);
- (vii) The use of £10.045m of the £10.102m estimated surplus HRA general reserves to make a revenue budget contribution towards funding the 2024/25 HRA capital programme (Section 3, paragraph 43);
- (viii) A 7.7% increase in dwelling rents for 2024/25, in accordance with the government's Rent Standard. This will result in an average weekly rent increase of £6.91 for Norwich social housing tenants (Section 3, paragraphs 48 to 55);
- (ix) That garage rents increase by 7.7%, based on CPI in September 2023 plus 1% (Section 3, paragraph 53);
- (x) That the setting of tenants' service charges is delegated to the Executive Director of Housing & Community Safety in consultation with the portfolio holder for Housing after engagement with tenant representatives (Section 3, paragraph 54) ;
- (xi) The prudent minimum level of Housing Revenue Account reserves as £5.848m (Section 3, paragraph 70 and table 3.4);

Capital and Commercial Strategy

- (xii) The proposed general fund capital programme 2024/25 to 2028/29 (2024/25: £31.139m; 5 years: £47.108m) and its method of funding as set out in Section 4, table 4.2, table 4.4 and Appendix 4 (B);
- (xiii) The proposed HRA capital programme 2024/25 to 2028/29 (2024/25: £41.107m; 5 years: £180.500m) and its method of funding as set out in Section 4, table 4.2, table 4.5 and Appendix 4 (B);
- (xiv) The capital strategy, as required by CIPFA's Prudential Code;
- (xv) Delegating to Cabinet, approval to include in the capital programme, additional capital schemes funded wholly by grant where it meets the

- Council's aims;
- (xvi) Delegating to the chief finance officer in consultation with the executive director of development and city services, approval of adjustments to the 2024/25 and future capital programmes to reflect the funding requirements of projects funded from the Towns' Deal;

Treasury Management Strategy

- (xvii) The borrowing strategy 2024/25 through to 2028/29 (Section 5, paragraphs 5.25 to 5.29);
- (xviii) The capital and treasury prudential indicators and limits for 2024/25 through to 2028/29 contained within Section 5 including the Authorised Borrowing Limit for the council;
- (xix) The Minimum Revenue Provision (MRP) policy statement contained in Appendix 5 (Section 5);
- (xx) The (financial) Investment Strategy 2024/25 including changes to counterparty limits;

Summary of key financial indicators

- (xxi) Indicators for 2024/25 through to 2028/29 as contained in section 5.

Amendments recommended by Cabinet:

- (xxii) Increase the funding for the play area improvement programme by £1.1m over the period 2024/25 to 2026/27.
- (xxiii) Increase the funding in 2024/25 for the improvement of the changing pavilions at Eaton Park by £0.3m; and
- (xxiv) Increase the funding for Sloughbottom park by £0.85m.

(Councillor Packer left the meeting at this point.)

9. Corporate Performance Report for Quarter 3, 2023/24

Councillor Stonard, leader of the council presented the report, it set out progress for quarter 3, year two of the current Corporate Plan 2022-2026. There were 23 quarterly and no annual Key Performance Indicators (KPIs) reported for this period.

The report showed a notable improvement for performance with 16 KPIs showing as green, three showing as red and just one as amber for quarter 3. At a time when there were some of the highest demands for services, along with resource challenges, this was the best level of performance for two years. Action was being taken on the three red KPIs, he advised that in relation to the number of complaints responded to in ten days a task and finish group had been formed to review process and improvements were already being seen.

The dip in digital channel shift this quarter was expected due to the County Council parking back-office services previously provided by the City Council moving to a different provider. This service was predominantly carried out online with most residents requesting parking permits online. Challenges with channel shift had been anticipated and would be address via the new Customer and Digital Strategy and associated action plan.

He highlighted notable successes, the percentage of housing rent collected had significantly improved moving from red to green this year with 99.3% the indicative projection for year end. Improvement in call wait times had increased customer satisfaction which had moved from red to green this year and was now reporting above target. The improvement came because of efforts made by the customer contact team to redesign and improve processes to reduce average call wait time.

Improvement had also been made on the indicator for the total number of private sector insulation measures completed which had moved from red (34 measures) in Q4 of last year to consistently green this year, with a total of 83 measures being installed in quarter three. It was worth noting that many of the central government retrofit schemes no longer required the involvement of local authorities, therefore there were likely hundreds more private sector installations occurring across the city that the council were not aware of.

Councillor Stonard referred to appendix A of the report detailing achievements and challenges over the quarter. He highlighted the successful delivery of the first batch of new homes at Threescore by Lion Homes, with 20 new family homes handed over this quarter. Within community safety several Partial Closure Orders had been secured protecting vulnerable residents from cuckooing, a practice where people take over a person's home and use the property, often associated with the use and trade of illegal drugs. The community safety team had also successfully secured Safer Streets funding from round five.

Within the elections team, new online postal voting requirements had successfully been implemented and within the revenues and benefits team a review of the allocation of Discretionary Housing Payments would enable new applications to be supported until the end to the financial year. He was pleased with the improvement seen in performance and thanked cabinet members and officers for their work.

Councillor Jones, deputy leader and cabinet member for housing and community safety highlighted the work of the community safety team and credited officers with turning around performance in a challenging service. She referred to the fact that demand for homelessness services had never been higher and yet Norwich as a city were still bucking the trend in terms of rough sleeping rates which could be attributed to positive partnership working with other key providers. Finally, she referred to the significant improvement seen in the delivery of gas safety certification which reflected the council's commitment to ensure compliance.

Councillor Giles, cabinet member for communities and social inclusion referred to performance within his portfolio, highlighting that the average number of days taken to process new housing benefit claims at 18 days compared favourably to that of neighbouring authorities. The target for processing council tax reduction scheme applications stood at 35 days with the processing time of 31.62 days achieved this quarter. He thanked the benefit department for their hard work reflected in the positive performance against targets.

In response to Councillor Galvin's question in relation to an increase in the number of Freedom of Information requests the council received, Councillor Stonard, leader of the council commented that he did not agree that this was associated with a lack of trust in the council. Councillor Galvin referred to the council's commitment to

openness and transparency and listed a number of areas of the council's website which were out of date.

She highlighted that senior salaries had not been updated since 2018, homelessness provision since 2016, Social Housing Asset Value since 2018, car parking reports since 2021, parks and open spaces expenditure since 2017, community grants since 2019, trade union facility time since 2018 and the number of freedom of information requests since 2018. Stonard confirmed that the council were committed to openness and transparency and agreed to investigate and update the website if required.

RESOLVED to:

- 1) review progress on the key performance indicators for this quarter; and
- 2) ask officers to investigate if the areas of the website identified required updating and to update if needed.

10. Risk register Q3 2023-2024

Councillor Kendrick, cabinet member for resources, presented the report which set out the quarter three position of the Corporate Risk Register. He advised that there were no significant changes to the council's risk profile since the quarter two update was received. However, he highlighted the substantial improvement that had been achieved in relation to health and safety responsibilities.

The risk associated with health and safety compliance in council homes and buildings had now been removed from the Corporate Risk Register and would continue to be managed at a Directorate level. This followed the formal notification from the Social Housing Regulator that they were satisfied with the progress made in addressing the issues which led to the council self-referring itself for breaches and represented a key achievement in the journey to bring about rapid improvement in this area.

Councillor Galvin asked for confirmation that the council was not planning or involved in any legal proceedings of any kind in relation to the health and safety breaches. The chief executive officer advised she did not have the information to hand and agreed to respond to Councillor Galvin outside of the meeting.

With no members indicating that they wished to discuss the exempt appendix accompanying the report, it was:-

RESOLVED to note the identified risks and the direction of travel.

11. Budget monitoring report Q3 2023-2024

Councillor Kendrick, cabinet member for resources, presented the report, the council continued to maintain a strong financial position with the general fund indicating an underspend of £3.5m. The majority of saving proposals agreed for the financial year remained on track, including those agreed for the increased levels of income from treasury management activity which continued to perform strongly both in terms of financial returns but also in relation to maintaining a low risk profile.

For the housing revenue account (HRA) an overspend of £3m had been projected, which remained attributable largely to the impact of continuing high rates of inflation on the expenditure necessary to maintain the housing stock, combined with the additional level of work required to reinstate void dwellings to a lettable standard.

The capital programme was currently indicating underspends of £0.9m for the general fund and £6m for the HRA, although many of the underspent budgets would be requested to be carried forward as work continued into the next financial year.

He was pleased to note the strong financial position of the council and to endorse the recommendations.

In response to Councillor Galvin's question as to what was the cause of the delay on HRA upgrades, the Interim Executive Director of Housing and Community Safety responded that in part this was due to the need to await the results of the stock condition survey as this would direct investment in the right place and in part due to accelerated expenditure dealing with compliance issues through the revenue account.

RESOLVED to note:

- 1) the forecast £3.5m underspend on the general fund revenue account and the £3m overspend on the Housing Revenue Account (HRA);
- 2) the forecast £0.9m underspend against the general fund and the £6.0m underspend against the HRA capital programmes; and
- 3) the areas of significant variances contained within the report.

12. Treasury Management Q3 Review Report 2023/24

Councillor Kendrick, cabinet member for resources, presented the report. He advised that the report highlighted that the council were adhering to its Treasury Management Strategy and Policy and that the report had been endorsed by Treasury Management Committee on [9 January 2024](#).

He advised that the council operated within the CIPFA Code of Practice for Treasury Management in the Public Sector and the Prudential Code for Capital Finance in Local Authorities. These Codes placed a responsibility on members to review and scrutinise treasury management policy and activity against prudential indicators. The report set out a range of indicators and highlighted that there were no breaches to alert members to.

He noted that since the start of 2023 The Bank of England had raised the base interest rate from 4% to 5.25%. The base rate of 5.25% had now been held since early August. However, whilst the headline inflation rate continued to fall it was still double the 2% Bank of England target rate.

The council remained significantly internally borrowed and cash balances available for investment would continue to enable the council to maximise its returns in the current high interest rate environment. As set out in the treasury management strategy, priorities for the investment of the council's day to day cash balances were to safeguard security, ensure that liquidity was maintained and then to achieve yield.

The council's Treasury Management activity continued to be monitored against the wider economic backdrop in accordance with Link Asset Services and the council's Treasury Management Strategy.

He was pleased to commend the recommendations to members for approval at council.

In response to a question from Councillor Galvin the Interim Chief Finance Officer advised that the Treasury Management Strategy was largely informed by statute and the council's treasury management advisors Link Asset Services who provided detailed guidance.

RESOLVED to note the contents of the report and in particular the treasury management activity undertaken in the 3rd Quarter of the 2023/24 financial year and recommend it for approval by Council.

13. Risk register Q3 2023-2024 – (Exempt appendix – para 3)

This item was noted under item 10 above.

14. Disposal of assets (housing) – (Exempt - para 3)

The chair advised that this item had been withdrawn from the agenda.

13. Draft Treasury Management Strategy

The chair advised that this item would now be considered at the cabinet meeting on 7 February 2024 as part of the budget papers.

RESOLVED to defer consideration of the draft Treasury Management Strategy to the cabinet meeting on 7 February 2024.

14. Exclusion of the public

RESOLVED to exclude the public from the meeting during consideration of item *15 (below) on the grounds contained in the relevant paragraphs of Schedule 12A of the Local Government Act 1972 (as amended).

15. Managing Assets (Housing) (Key Decision) (Para 3)

Councillor Jones, deputy leader and cabinet member for housing and community safety presented the report. She advised that a number of sites were considered in order to identify those which were most appropriate and that ward councillors had been consulted in relation to sites detailed in the report. She considered it was a priority for the council to use its right to buy receipts to get new homes built and commended the recommendation for approval.

RESOLVED to approve the disposal of the named sites to the housing associations identified, in order to enable new affordable housing for the city.

CHAIR



Committee name: Cabinet

Committee date: 06/03/2024

Report title: Corporate Plan 2024-2029

Portfolio: Councillor Stonard, Leader of the Council

Report from: Interim Executive Director of Housing and Community Safety

Wards: All Wards

OPEN PUBLIC ITEM

KEY DECISION

Purpose

To consider the new draft corporate plan 2024-29.

Recommendation:

It is recommended that cabinet agree 'We are Norwich' – the draft corporate plan 2024-29 – and recommend the plan to council for consideration at its meeting of Tuesday 12 March 2024.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report incorporates the ambition of all of the above under a new set of priorities that have emerged following a full and extensive period of consultation with both internal and external stakeholders: They are:

- A Prosperous Norwich
- A Fairer Norwich
- A Climate Responsive Norwich
- A Future-Proof Norwich
- An Open and Modern Council

Report details

1. This report seeks cabinet agreement of 'We are Norwich' – the draft corporate plan 2024/29 – and recommend the plan to council for approval and full adoption (to be heard on Tuesday 12 March 2024). The plan – “We are Norwich” – is attached at appendix 1; a working draft of priorities which will inform the business planning process are shown at appendix 2; data and evidence about Norwich which supports the plan’s context is at appendix 3; an Equality Impact Assessment (EQIA) is at appendix 4; an Engagement Report summarising the consultation process and the feedback received is at appendix 5; and the independent consultant’s summary of findings from our engagement with residents and stakeholders is at appendix 6.
2. The plan was considered by your scrutiny committee on Thursday 29 February. As this meeting occurred after the deadline for submission of this report for publication, the recommendations of your scrutiny committee are not included here and will be tabled at your meeting today.
3. To assist with the development of the plan and to bring independence to the consultation process, we worked with strategy experts Inner Circle Consulting (ICC) and public engagement specialists Collaborate CIC to carry out the considerable independent public and stakeholder consultation that underpins the plan.
4. A number of key objectives have guided the development of the plan. These include the ambition to create a plan that:
 - Responds to the ambitions and feedback of the people of Norwich.
 - Is accessible to the people of Norwich.
 - Provides a clear vision and priorities understood by residents, partners and our workforce.
 - Enables the council to adapt to changing circumstances, while remaining focused on the outcomes it needs to achieve.
5. Supporting the above, an intensive programme of consultation took place across Norwich during November and December 2023 (this is detailed in items 20-43). Over 900 individuals and organisations were engaged as part of this process, including Norwich residents and tenants' groups, councillors and officers, voluntary sector and community organisations, and local businesses and business networks.
6. A specific focus of the consultation was to hear from those priority groups identified in the council’s new Equality, Diversity and Inclusion Strategy, for example, by focusing street engagement interviews in the Mile Cross and Earlam areas and holding roundtable sessions and one-to-one interviews with voluntary and community organisations representing relevant groups.
7. The draft corporate plan’s contents are wholly developed from the priorities and challenges raised during the engagement process.
8. The extent of this consultation and its predominance in informing the plan’s content was purposeful and driven by an ambition for the people of Norwich to engage with the plan and shape the future; to inspire collegiate and

collaborative working as the plan is realised (with stakeholders and local communities); and to deliver a plan that the council's workforce understands and through which they feel empowered and enabled.

9. As such, the plan focusses on the outcomes the council and Norwich communities want to achieve. Outputs – which describe how the council will achieve those outcomes – will be considered under the business planning process and be informed by the working draft of priorities shown at appendix 2. Business planning components of the plan will sit in a separate document. The process is outlined in items 15 to 19.
10. This approach has enabled a plan that can be better understood by those we work with and for, as well as those who work for us.

The draft plan

11. In their consideration of the new draft plan as it appears at appendix 1, cabinet are asked to note that:
 - This version of the plan may be subject to change following the recommendations of your scrutiny committee and any comments received at your meeting today.
 - Some pages of the plan feature photographs of people from across the city and council, with the aim of helping the people of Norwich “see and feel” the city represented in the plan.
 - The version presented in appendix 1 is not designed – the layout and formatting are simply to aid understanding. The final plan will be a fully designed document.
 - Accessible formats of the plan including an easy-read version will be developed following agreement of the plan. The plan will also be made available in other languages when requested (using the protocols currently deployed to do this).
12. As indicated above, the strength of this new plan is the significant engagement of Norwich communities in its development. This has included some priorities being highlighted that may not be a direct responsibility of the council.
13. Rather than focus only on areas where the council is the primary service supplier, the plan proposes that it should use its strong advocacy, influencing, convening and enabling powers to help deliver all of the outcomes the people of Norwich want to see.
14. This will require a fully collaborative approach, identifying mutual benefit and interest to foster buy-in and investment, as well as deploying council assets and powers to engage relevant delivery agents. We will work through and with our many partners to achieve this, including the voluntary and community sector, businesses and across the wider public sector system.

Business planning

15. As above, the corporate plan (appendix 1) is outcome focussed and does not include detail on activities and outputs. A business plan will be developed, and it is within this that these will be detailed and worked through.

16. The planning process for this will be in three parts:

i) The identification and establishment of the internal infrastructure required to support delivery of the corporate plan over the next five years.

This is likely to include areas such as improvements to our use of data, and to how we hear, and use, the views of our communities to inform decision making, enhancing support for service improvement in identified areas and investment in services where needed.

The identification of this internal infrastructure is underway. Recruitment, budgetary and other internal processes will need to be completed before solutions may be embedded.

ii) Cross council work, led by the Senior Leadership Team, to identify the key areas of work required to effectively deliver the outcomes set out in the corporate plan.

This will be undertaken via cross-service workshops based around each corporate plan priority, and smaller task-and-finish groups focused on grouped outcomes. The process will be supported by training on outcome-based planning – supporting colleagues to think differently about how best our services can deliver our priorities – and through challenge from colleagues and partners.

The aim is to develop an agreed set of priority work areas to deliver the outcomes of the plan, but the process will also form part of our work to develop our culture to become an open and modern council, helping colleagues to better understand the needs of residents and the city, and to value partner and colleague input; as well as to recognise the role of partners in our delivery, joining up better across our service areas, and being empowered to take decisions.

Sessions will be held across all directorate areas to explore current resource allocation, seeking to realign resources with the outcomes of the cross-service workshops. This work will inform the budget process for 2025/26 and the rest of the MTFS period.

iii) The development of a new performance framework which effectively measures our progress towards the outcomes set out in the corporate plan and supports internal performance management.

Based on analysis of best practice, we anticipate that the performance framework will look quite different to the current approach. Work is underway to design our preferred route, and the work set out in point (ii) above will inform the content of the new structure.

The new performance framework will be incrementally realised through a phased approach that sees it adopted in stages. This will allow for the framework to be piloted and tested before it goes 'live' and allow for development of the business plan.

We will continue to report against the existing framework until the new one is finalised.

17. The process set out above will produce an annual business plan and performance framework for the council covering the corporate plan period 2025-2029, with clear priorities and good quality, regular measurement of progress. Year one (2024/25) will be a transitional one, between the reporting framework we have currently, and the new model.
18. The new processes will bring clarity to service areas to enable work and resource planning and will support our aim to manage budgets against corporate priorities; they will also allow sufficient flexibility for the council to influence and/or adjust plans throughout the period if external circumstances change.
19. The business plan and performance framework will also represent an important step in our desire to become an open and modern council, ensuring service areas are working together more effectively to deliver for the city, and that we are listening to the people of Norwich, responding dynamically and successfully to what they are telling us.

Consultation overview

20. A key objective in producing a new corporate plan was to put the people of Norwich front and centre of its development. This saw a programme of citywide resident and stakeholder engagement across Norwich from October through December 2023.
21. The consultation was designed to provide the council with meaningful insights into the priorities and needs of all people across the city – this includes all groups cited in the council's new Equality, Diversity and Inclusion Strategy, approved by cabinet in January 2023.
22. Consultation activities included:
 - Stakeholder interviews.
 - Workshops.
 - Panel discussions.
 - Focus groups.
 - Street outreach.
 - Online surveys.
 - Data gathered from previous consultations.
 - Other extant and relevant data sources.

23. Data about the demography of respondents to the consultation was invited voluntarily and then anonymised. This enabled meaningful discussion. As a result, any data gathered cannot be linked to comments and so cannot be used to weight the ideas of any particular audience or group.
24. Rather, through the business planning process and the development of the performance framework (that will follow), data the council holds on Norwich communities will be deployed to ensure targeted and specific action in priority areas and amongst priority community groups. Examples of this may include the data held on Reducing Inequalities Target Areas (RITAs) with performance being measured on the council's progress in tackling the issues faced in these locations, and consultation with voluntary and community organisations who are closely working with vulnerable communities.

Consultation detail

25. In-depth conversations comprised 26 structured interviews representing business, civil society, and the public, creative and cultural sectors. In addition, there were three focus groups with people from voluntary and community sector organisations (VCSE), as well as creative and cultural organisations, while insights gathered from the council's Community Connectors and Conversation Officers were also considered.
26. Within this, VCSE organisations represented the experiences and needs of disabled people, women experiencing domestic violence, refugees, people experiencing housing vulnerability, young people, older people, people using food banks, and some faith groups.
27. All participants were invited to be candid, on the basis that contributions would be anonymised and any quotes non-attributable. To facilitate this, no demographic data was captured during this phase of the consultation.
28. Our street engagement comprised interviews with 138 people from across the city, with groups and individuals interviewed outdoors and indoors, in cafes, community spaces, and at bus stops, libraries, shops and school gates.
29. Some demographic information was recorded for the on-street engagement, but it was not possible to gain comparable demographics across the piece, noting that submission of such information was voluntary.
30. However, engagement can be generally described as with more women than men, and more older people (40+) than younger people. This included some sixth-formers, university students, parents of young children and pensioners as well as many working age adults.
31. Many of those consulted on-street had some sort of physical or mental health condition, but fewer people had an identified disability; some were experiencing insecure housing or were previously homeless.
32. Most interviewees were of White British ethnicity, but people of Polish or other Eastern European backgrounds, and those from African and Asian diaspora origins including migrants and Black British people, were also interviewed.

33. In the main, people lived or worked in Norwich, with some commuting in from surrounding districts or counties. As per above, given the limited demographic data, we have not broken-down views by identity or position.
34. The public survey included three surveys on Get Talking Norwich: one aimed at council staff, a public survey, and an accompanying map-based survey.
35. Norwich City Council staff engagement included three focus groups with staff representing different teams and levels of seniority/tenure; three 'playback sessions' with senior managers; and an all-colleague survey, hosted on Get Talking Norwich and promoted throughout November.
36. All participants were invited to be candid, on the basis that all contributions would be anonymised and any quotes non-attributable.
37. Insights from previous Community Conversations were also gathered. This included data that has been collated from conversations by Community Connectors and Community Conversation Officers since 2022. The conversations came from six areas:
- Heathgate / Mousehold / Cowgate
 - Lakenham
 - Mancroft
 - Mile Cross
 - North Earlham
 - West Pottergate / Russell St.
38. Consultation with council tenants included a 90-minute focus group with council tenant representatives, all of whom are involved in tenants' associations. In addition, council tenants and people who live in private rented accommodation were consulted during the street engagement activity described above.
39. As per above, participants were invited to be candid, on the basis that all contributions would be anonymised and any quotes non-attributable.
40. Member and partner consultation comprised four workshops with elected members and one with partners and cabinet. Those unable to attend in person were invited to submit responses by email. The workshops comprised individual group sessions for:
- Cabinet
 - Labour group
 - Opposition group (Green and Liberal Democrats)
 - City vision partners and cabinet (joint)
 - The Climate and Environment Emergency Executive Panel

Young people

41. As the city's future workers, parents and leaders, it was important to consider the views of young people in shaping the plan.

42. The consultation process revealed a growing consultation fatigue developing amongst young people (as well as other consultees). Voluntary and community partners who work with young people recommended that the priorities expressed by young people during the consultation period for the City Vision 2040 were incorporated into the development of the plan.
43. How we continue to ensure the views of young people in our city are heard and responded to will be addressed as the business planning process and performance framework are developed. Within these processes lies the opportunity to engage and excite the input of all user groups, ensuring the council is feeding back to people and actively linking the actions to the responses received from consultation.

Data

44. The plan details an ambition for the council to be data-driven under its Open and Modern Council theme. Outcomes from this work are listed as delivering:
- Improved cost-effectiveness, driving better targeted services.
 - Enhanced customer relationships.
 - People focused, data and insight driven, effective decision-making.
 - A learning, continuously improving, well-run council.
45. Anticipating this ambition, the independent engagement consultants also considered the following information and incorporated it into feedback, so helping to shape the plan.
- Norwich 2040 City Vision
 - Corporate Plan 2022-26
 - Other council policies, plans and strategies
 - Equality Information Reports from 2016-2023; the draft Equality, Diversity and Inclusion Strategy and the public consultation for this strategy
 - The final report of the LGA Corporate Peer Challenge 2023 and the council's response to LGA recommendations
 - Data derived from the Get Talking Norwich engagement platform
 - Budget consultation 2023/24 analysis – full report
 - Norwich 2011 to 2021 census overview
 - Norwich headlines March 2023 – internal briefing paper
 - Norwich headlines August 2023 – internal briefing paper
 - Findings from City Vision 2017-18 engagement exercise
 - Data from the City Vision Youth Conference in May 2018 and the City Vision Youth Survey undertaken in the same year.
 - The final report of the Norwich Good Economy Commission
 - Norwich Reducing Inequality Target Areas – analysis of indicators in October 2022 (a Norfolk Office of Data and Analytics (NODA) report)

46. Further and frequentative consultation exercises and iterative data sources (such as complaints data) will be used in the ongoing development of the plan and the business planning process to inform decision-making.

Implications

Financial and resources

47. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget, noting this new draft corporate plan will replace the previous plan if it is adopted by cabinet and council.

48. There are no proposals in this report that would reduce or increase resources. The new draft corporate plan sets the strategic direction for the council for the period April 2024 to March 2029 and lists a series of outcomes that the council seeks to achieve during this period.

49. Resource allocation and budget setting in support of these outcomes will be considered as part of the business planning process that follows adoption of the plan. As detailed above, this includes the development of a performance framework against which progress on delivering the outcomes will be assessed and thus a vehicle through which budgets may be iteratively reviewed.

Legal

50. No legal implications have been identified in the development of the draft corporate plan other than ensuring that data protection requirements have been met across the consultation exercise that informs the development of the plan.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	An Equality Impact Assessment for the draft corporate plan has been completed and is appended to this report. In summary, the plan positively impacts all communities in Norwich with no one particular group disproportionately affected. Not least, the extensive consultation undertaken to inform the plan and the resultant priority "A Fairer Norwich", as well as commitments within the plan to target areas and communities where need is greatest will help to advance equality outcomes in Norwich.
Health, social and economic impact	The plan supports the Norwich Health and Wellbeing Partnership Strategy under the "A Fairer Norwich" priority. This includes a commitment to work with our partners to close health inequities.

Consideration	Details of any implications and proposed measures to address:
Crime and disorder	Similarly (to the above) crime and disorder are considered within the draft plan under the “A Fairer Norwich” priority.
Children and adults safeguarding	While not specifically cited in the draft corporate plan, all relevant actions will align with the council’s published Safeguarding Policy statement.
Environmental impact	Environmental impact is considered throughout the draft plan. This includes a specific and dedicated priority (“A Climate Responsive Norwich”) and significant consideration of environmental themes under other priorities, most pertinently under the “A Future-Proof Norwich” priority.

Risk management

Risk	Consequence	Controls required
Operational	<p>The draft corporate plan has been developed through consultation with the people of Norwich. As such, it lists the challenges and opportunities that the communities the council seeks to serve view as their priorities.</p> <p>Without the plan, no clear and up-to-date set of priorities would exist for the council, or, rather, services would be required to work to the priorities featured in the current plan (2022-26).</p> <p>This would result in the council providing services that may not be relevant or fit for purpose and which would likely ignore the priorities that communities have identified.</p>	By adopting the draft corporate plan these risks are mitigated.
Legal	No legal risks have been identified.	

Risk	Consequence	Controls required
Reputational	If the council fails to adopt the priorities that the people of Norwich have identified (and which appear within the new draft plan), it is likely that negative perceptions of the council may be generated amongst the communities it serves, its partners and its staff (all of whom have contributed to the plan).	

Other options considered

51.No other reasonably viable options have been identified.

Reasons for the decision/recommendation

52.This report and its appendices are recommended to cabinet for agreement, and endorsement is sought for the plan’s onward journey to council (for full adoption).

Background papers: None

Appendices:

- Appendix 1: We are Norwich (draft corporate plan 2024-29)
- Appendix 2: Working draft of priority tables
- Appendix 3: Norwich in context – data and evidence
- Appendix 4: Equality Impact Assessment (for the above plan)
- Appendix 5: Engagement Report
- Appendix 6: Independent Consultant’s Summary Feedback Report

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	<p>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.</p>
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We Are Norwich

A community-led plan for 2024-29

Contents

- 1) Message from the leader of the council
- 2) What we did
- 3) What we heard
- 4) Our vision and shared priorities
- 5) Message from the chief executive
- 6) More about our shared priorities
- 7) How we will work
- 8) A very big thank you

Message from the leader of the council, Mike Stonard

When talking about what the next five years hold for Norwich, we asked people what they love about this place. Consistently, there were shared feelings that resonate deeply with me, especially the profound feeling of home. Norwich offers all the advantages of city living while nurturing a genuine and unique sense of belonging. It's where my roots are, and where I've chosen to call home.

I hope everyone shares this bond with Norwich, however I am acutely aware many among us live markedly different lives. Too many residents are grappling with making ends meet, managing their health and feeling connected within our community, and are sometimes therefore missing out on what Norwich has on offer. It is within our collective ability to transform Norwich into the best possible place for everyone.

Our five-year plan has been designed with you, reflecting your hopes, your ideas, and your joint commitment to making Norwich a great place. By committing to your priorities, we are agreeing on a singular path forward towards a future Norwich where everyone belongs, and everyone benefits.

We hope you will join with us in this effort. Together we can make Norwich a place that everyone can thrive in.

What we did

This plan has been developed by engaging with the people of Norwich through street conversations, public and employee surveys, in-depth interviews and focus groups.

Over 900 individuals and organisations were consulted across the city including Norwich residents and tenants' groups, community organisations, voluntary sector, local businesses and Norwich city councillors and officers.

By listening and learning from the feedback received through the consultation and by working in partnership, we have a very real opportunity to build a plan that unlocks the city's true potential and delivers against the priorities we share.

What we heard

We have a collective pride and passion for our city, but we recognise there are significant challenges that need to be addressed now, and in the future.

Norwich's welcoming and quirky spirit, independent shops, cultural and creative scene, open natural spaces, and compact size are all things we value and want to preserve. But we must work to improve the city's transport offer, the quality and quantity of local housing across all types and to suit all household incomes.

Issues arising from the cost of living faced by residents, businesses and partners and concerns about the look and feel of neighbourhoods outside the city's centre were also identified as areas to focus on.

Your feedback also told us that solutions need to be in place so that we can respond to our residents and wider service users when they're in touch with us.

At the heart of this is the need for the council to work with the people of Norwich to create solutions together, and for the council to use its influence, enabling and convening powers to deliver change in areas that sit outside of its specific and direct responsibilities.

We recognise that we are one organisation within the city, where everyone has a role to play. This plan helps us have a shared vision and goals and sets out what we will do and our ambitions for Norwich in the future.

Our vision

Norwich: a fair and thriving city, full of ambition

Shared priorities

To ensure we are clear about how we spend our time, effort, and money, we have developed five priorities, that we believe are the areas we should focus on to achieve our vision.

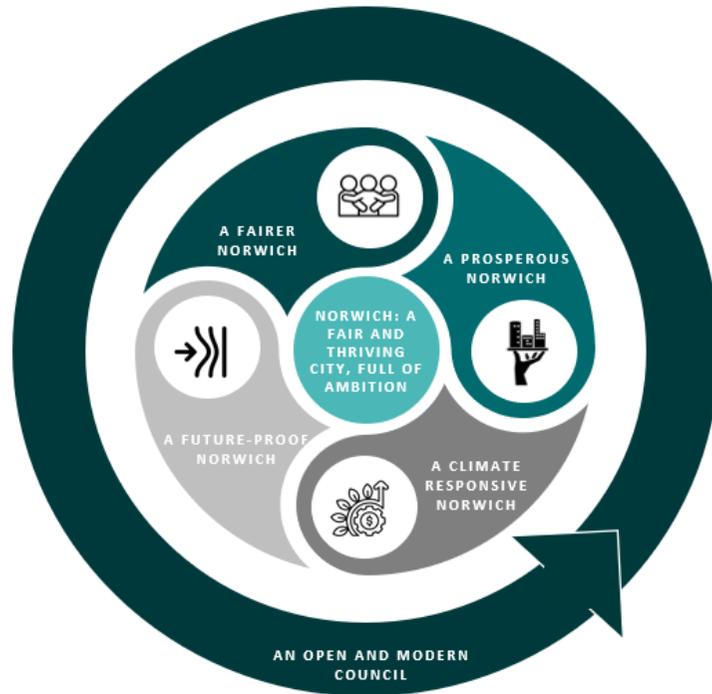
Our priorities are chosen based on what you told us during the consultation but also consider existing local, regional, and national plans and strategies. We are Norwich is our most broad strategic document, so the priorities are top-level.

We are Norwich contains ambitions that may be within our direct delivery and ability to change, and in some areas, we will use our ability to lead, influence and work in partnership with others in order to try and drive the right outcomes for our city. Our priorities will inform the more detailed development of a council Business Plan, which will describe what actions we will undertake to achieve our priorities.

We will measure our progress and success so that you can see how we are doing. This will be delivered through a new performance framework which will include clear measures of success as well as milestones against priorities.

We have identified five priorities:

- A prosperous Norwich
- A fairer Norwich
- A climate responsive Norwich
- A future-proof Norwich
- An open and modern council



RAFT

The creation of this five-year plan signalled a totally new way of working for the city council. For the first time, we went out to the whole city to ask them what was important to them and what our priorities should be.

Hundreds of conversations have helped to mould the plan. This allowed us to take all the incredible feedback and distil it into something that I hope speaks to everyone who reads it.

Our all-embracing approach to pulling this plan together is something I'm very proud of and is what we need to do more of at the city council.

I want us to inspire our residents to talk with us and have open conversations about the role of the council so we can clearly hear, and respond to, all of the voices across our communities.

Being an **open and modern council** is central to unlocking all that we want for our amazing city: a **prosperous Norwich**, a **fairer Norwich**, a **climate-responsive Norwich**, a **future-proof Norwich**.

It is only by becoming an open and modern organisation that we will be able to adapt to the changing needs of our residents, communities and businesses.

I really hope our new plan captures the essence of shared aspirations for Norwich.

A prosperous Norwich

Why this is one of our priorities

We want to put jobs, opportunity and growth at the forefront of our work. With business, we will enable a thriving, successful economy that is creative, innovative, inclusive and sustainable. We will make Norwich a great place to live, work, learn, and visit, where everyone shares in its success.

We will maintain our status as a Living Wage city, growing the number of businesses and jobs paying the real living wage. We will work with partners to diversify our economy to deliver good jobs for all, seeking to raise household incomes. We want to ensure everyone can gain the right skills for a changing economy and we will protect commercial spaces to support diverse sectors, entrepreneurialism, and job creation.

We want to make the city centre more accessible, connected to more of our residents and make it a place that meets the needs and aspirations of the whole city.

What you told us and how it links to this priority

Many of you love the city centre, its vibrancy and culture scene, but not everyone can easily access it.

There is also concern about how the city will change in the future, affecting the ways we live, and there is a desire to make sure that local neighbourhood centres are improved.

There is also concern that reaching Norwich from elsewhere is difficult, which might affect tourism and business investment. You are concerned that Norwich is a low wage economy, making it harder for everyone in Norwich to have a good job and affecting our ability to keep good workers here. There are other barriers to work too, like social and health factors, which may limit people's chances to access good jobs. Net zero and the link to Norwich as an innovative city is viewed as a definite opportunity for our economy.

What we are aiming for:

- [Norwich is a great place to live, work, learn and visit](#)

[This is what success might look like.....](#)

The city has grown and developed in sustainable ways and is renowned as a culture and creative leader maximising its tourism offer. Opportunities for regeneration and development are grasped and they provide equitable opportunities to housing and jobs. The city's young people have a better and more equal chance of educational success.

- [Business in Norwich thrives in an inclusive, resilient economy](#)

[This is what success might look like...](#)

We have a modern, inclusive, successful economy, which supports local and independent business to thrive and grow, graduate entrepreneurs and business start-ups are encouraged. Our economy is more diverse, and our businesses and communities enjoy the benefits of great partnership working which supports people to develop skills they need, and we see skills better matched to work opportunities.

- [Everyone has access and opportunity to great jobs](#)

[This is what success might look like...](#)

There is a wider range of job opportunities and a broader range of thriving industries. Collaborative working across the city has encouraged a higher skilled and more diverse workforce, supported by more apprenticeship opportunities at the council and its trading companies. People feel they have the support they need when navigating the job market or accessing work.

- [Better incomes for people in Norwich](#)

[This is what success might look like...](#)

Incomes have risen and people have better standards of living. The Real Living Wage has become the norm not the exception, more people receive the benefits to which they are entitled and there is a greater number of high-quality unionised jobs. The economy is more inclusive and there is support for people into work, particularly in our most disadvantaged communities. We are moving towards a greener economy, and Norwich has become a city which sees increased spending and economic growth in green sectors.

A fairer Norwich

Why this is one of our priorities

We want to prioritise health and wellbeing for all. Be a place where we can live in vibrant, diverse, safe neighbourhoods where everyone feels connected and valued and part of a caring community - in the city and in our local neighbourhoods.

We aim to deliver growth and regeneration for our less wealthy areas, building more homes, especially more affordable homes for those people and families who need them. We will act to ensure homes are good quality, fit for the future, warm and in good repair. We will start regenerating our council homes, improving estates and reducing energy costs.

We will work to support and empower people and families, so they are more able to face economic, social, and environmental challenges. This includes reducing inequality and tackling poverty by enabling growth and jobs in more neighbourhoods, raising life and healthy life expectancy, improving education levels and health outcomes. We want to make sure nobody is left behind.

What you told us and how it links to this priority

You told us that there is significant and long-term poverty and that it's getting harder to escape poverty. The cost-of-living crisis has made this worse and many people are having to make impossible decisions between basic needs, such as eating or being warm.

You felt that our council housing is an asset but that we need to keep up with maintenance and enhance how our estates feel, and that improvements to the private rented sector are important too. There is concern around the availability of housing overall and increased homelessness. You said that support from Norwich's community and voluntary organisations is valued but is unable to reach everyone. You recognised that the Council and partners focusing on targeting work to our most deprived areas was a good approach and should continue.

What we are aiming for:

- [People have better health outcomes and longer life expectancy](#)

[This is what success might look like...](#)

Levels of poverty and inequality fall across the city and there is a reduced gap in life expectancy between communities with longer life expectancy for all. Services and partnership networks are better targeted and there is increased access to services that are based on need.

- Our city and local neighbourhoods are safe, diverse and vibrant

This is what success might look like...

We have diverse and vibrant neighbourhoods where our streets are clean and safe. Growing numbers of people enjoy creative and culture events. We have safe and welcoming public spaces that celebrate diversity and we're proud of throughout all our neighbourhoods.

- Good quality homes for all

This is what success might look like...

There are more affordable homes, and we encourage that new homes - across all tenures - are built to low or zero carbon standards. Our tenants benefit from high quality repairs and maintenance services, and we have a deliverable retrofitting programme. Homes across the city are warm and in good repair – supporting better health and specific needs. Partnership working, tackling underlying causes, continues to reduce and prevent homelessness and rough sleeping.

- Tackle the root causes of disadvantage

This is what success might look like...

People and organisations are working in a joined-up way across the city and in our local neighbourhoods, tackling long standing challenges and inequalities which lead to poverty and disadvantage. More people are digitally included, and people can access advice and support to deal with debt. There is more equality of opportunity.

A climate responsive Norwich

Why this is one of our priorities

We must continue to tackle the climate emergency by reducing our own carbon emissions to become a net zero council by 2030 and working collectively with city partners for a net-zero Norwich by 2045. This may take longer across our council homes, but we will make a start.

We will work to ensure all decisions made by the council consider and mitigate the impact on the climate and the biodiversity crisis. We will protect and enhance our outstanding parks, green and blue spaces and our natural environment, so they are vibrant and accessible to everyone, and places where wildlife thrives.

We will work with our partners, including the County Council, to work towards a city where transport is cleaner and better connected, linking communities to communities and people to opportunity. We will work together to help make Norwich an exemplar city for digital connectivity and inclusivity.

What you told us and how it links to this priority

You really like Norwich being a compact and walkable city with its rivers and natural areas seen as a huge asset. You also told us about a number of challenges including issues with the city's transport system, old and poorly insulated council homes in need of modernisation and how we need to get people to make the necessary changes to make the city and the county climate efficient.

Linked to these challenges were possible opportunities – because the city council owns a large number of council homes it is seen as well placed to catalyse improvement programmes, benefiting from economies of scale. Norwich Climate Commission was seen as being in a good place to begin conversations about the low carbon roadmap it has set out.

What we are aiming for:

- [A net-zero council by 2030](#)

[This is what success might look like...](#)

Our council services have a reduced carbon footprint, and environmentally conscious suppliers are supported by increased council investment and spending. Our businesses drive a low emission agenda, our recycle rates are increased across the city and our air quality is improved. These help us to achieve our net zero target.

- [Aiming for net-zero for Norwich by 2045](#)

[This is what success might look like...](#)

Norwich is known for being a leader in the green economy and enjoys being a low-carbon city with a growing green economy. We see an increase in the use of public transport and active travel, and we take pride in our partnership work to lower emissions across the city. A lower proportion of household income is being spent on energy.

- [Vibrant parks and open spaces for all](#)

[This is what success might look like...](#)

Our parks and green spaces have increased usage across all communities, with improved recreation, sport and leisure opportunities, evidenced by a higher take up in sport and physical activity, contributing to better mental and physical wellbeing. The biodiversity value of our open spaces is increased and supports thriving wildlife.

- Growing our capacity to adapt to climate change

This is what success might look like...

We take advantage of world class research based in Norwich to help us to adapt to climate change. There is increased awareness and understanding of climate change across all our communities, so that people can change behaviours and continue to thrive despite the challenges posed by climate change. We encourage and work to pursue ecological recovery, greater diversity and abundance across insects, plant life, animals and many other species which live in our city.

A future-proof Norwich

Why this is one of our priorities

We want to put Norwich at the forefront of the journey to zero carbon, harnessing the city's innovative nature, bringing forward the jobs of the future and leading on the just transition to a green economy.

We will face the increasing challenges of heat, rising tides and flooding, along with other future shocks, by collaborating to deliver a Norwich 'City Resilience Plan', that will future proof us for decades to come.

We want to bring the city's partners and communities together to shape a city approach to a sustainable future, jointly meeting our challenges and co-designing our future aspirations and plans.

What you told us and how it links to this priority

You feel there is a real opportunity for a comprehensive zero carbon development programme – something that could provide opportunities for young people to develop future-facing employment skills. Poor educational attainment was highlighted as a challenge, along with a lack of opportunities and low salaries.

You noted that the council has a strong foundation working with the voluntary and community sector, needing to build on this to reduce barriers and ensure this foundation translates into strongly empowered communities.

The city vision partnership was also seen as having an established platform which can be used to continue conversations with partners who can collectively work towards shared goals for the benefit of all.

What we are aiming for:

- Empowered communities

This is what success might look like...

Our communities are active and strong, they are empowered to act locally to achieve the best local solutions. We partner and work with the public sector, business, voluntary and community organisations to support communities and help lead change.

- A city ready for change

This is what success might look like...

Our streets are vibrant and busy and have the right facilities for our communities. We ensure that new homes are built in sustainable locations close to jobs and amenities and the city's long-term future is secure based on planned investment projects, which take advantage of funding opportunities when they arise.

- Being equipped for new ways of working

This is what success might look like...

We enjoy digital equality and embrace being data-driven to help make joined up decisions. We encourage economic development in our city, have a talent pool matched to need and have better connected communities and businesses.

- Being prepared for future challenges

This is what success might look like...

With partners we lead the development of a citywide resilience plan which prepares our city into the future. Our communities are all more resilient and are better prepared to navigate threats and change – strengthening the city's reputation for being a safe place to live and do business.

An open and modern council

Why this is one of our priorities

Becoming a modern council – one that is responsive to what matters to our city and an enabler for progress, inclusion and sustainability will be based on developing a rich and ongoing conversation between the council and residents. This conversation will flow into and underpin all our priorities – a city council where you shape our services. We will use data to design and deliver services that are high quality, value for money, accessible and are responsive to the needs of our residents.

To be this kind of council we will need to create the right structures, invest in our people, provide fulfilling careers, and equip them with the skills, tools and workplace they need to provide truly 21st century services for Norwich. We will consider equality in all that we do so we can grow the diversity of our workforce, to better reflect the city.

Above all: we will work with, and for, Norwich.

What you told us and how it links to this priority

Some of the challenges you highlighted looked at how we engage with our residents and service users, noting areas that need to improve such as our complaint handling and the general quality of how we respond – especially so with tenants. But using the data and insight we hold was seen as a positive way for us to use that information to better engage with our residents and understand their needs.

What we are aiming for:

- [A collaborative council](#)

[This is how it could look...](#)

Our council is regarded as open and transparent. We have high levels of involvement across our voluntary and community sectors, and we share our skills and knowledge across private and public sectors to achieve common goals. We have taken a partnership approach to city leadership, building a coordinated approach and deliberate response to city challenges. We have played a critical role in developing a strong sense of community in local neighbourhoods and city-wide.

- [A council delivering excellence](#)

[This is what success might look like...](#)

Listening to feedback has helped us to create user-friendly services which are linked up and targeted - because we are open to finding different solutions and we have encouraged people to influence change in the way we deliver services. Delivering excellence has contributed to the council being financially stable.

- [A council invested in its people](#)

[This is what success might look like...](#)

The council has a skilled and talented workforce that can tackle the complex challenges the city faces. People enjoy working for the city council because it offers good career opportunities and our workforce reflects the diversity of the city, this helps retain and develop the talented people needed to achieve the aspirations set out in this plan for the city and its residents.

- A data and insight driven and people focused council

This is what success might look like...

More people access our digital services, we see improved cost-effectiveness which leads to better targeted services and improved relationships with service users. We make good decisions because we use data and insight to support us and we are people focused and are always keen to learn and improve. This helps to give us the tools we need to have a well-run council.

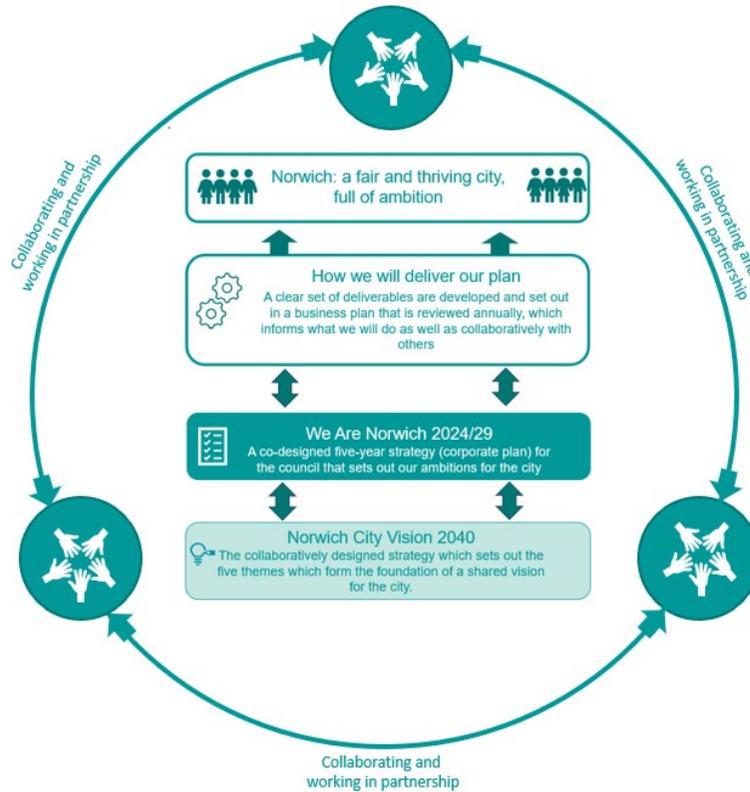
How we will work

We have a few guiding principles that inform everything we do. They underpin all our priorities and are central to the way we must work to get the best outcomes for our city.

- **Be unashamedly ambitious for Norwich**
- **Do the basics well on the services we provide**
- **Listen to the city**
- **Work in partnership**
- **Focus on the climate in all that we do**
- **Put equality and inclusion front and centre of all our thinking**
- **Use evidence to inform the services we provide**

Working together

This plan is focussed on making the city better for the people of Norwich. It sets out how the council plans to work collaboratively with its partners and the communities it serves – delivering the ideas, addressing challenges and creating opportunities the people of Norwich have said they want to see.



Finally...a very big thank you!

The best way to respect your contributions to this plan, and to express our thanks, is to engage with our partners and the local community and deliver it.

Thank you for your support. We look forward to working with you.

Our priorities in more detail

A prosperous Norwich



<p>What we are aiming for</p>	<p>Norwich is a great place to live, work, learn and visit</p>	<p>Business in Norwich thrives in an inclusive, resilient economy</p>	<p>Everyone has access and opportunity to great jobs</p>	<p>Better incomes for people in Norwich</p>
	<p>OUR FOCUS</p>	<ul style="list-style-type: none"> Improving the way we manage our assets for the benefit of the city centre and local neighbourhoods. Enabling the growth and development of the whole city in an inclusive, sustainable, healthy and resilient way. Securing social value from growth and development, benefitting communities. Celebrating and promoting our excellent culture, creativity and 	<ul style="list-style-type: none"> Creating a new Economic Strategy for a modern, sustainable city which exploits the unique attributes and opportunities available to the city and local neighbourhoods. Working with partners to support local and independent businesses to thrive and grow. Continuing to build relationships and learning, including as part of Fast Growth Cities 	<ul style="list-style-type: none"> Working with our partners to strengthen the local supply chain, supporting local suppliers and jobs. Using our knowledge and data, supporting institutions to develop and provide training for new jobs in emerging industries. Making the case for improvements to our public transport network to local and national governments Working with partners and business so that our workforces reflect the diversity of the city and that people face fewer barriers to employment, especially those from more deprived backgrounds.

<p>heritage offer locally, nationally, and internationally.</p> <ul style="list-style-type: none">• Harnessing our creative sector for inward investment and tourism.• Using regeneration as an opportunity for disadvantaged areas and people – particularly focusing on East Norwich and Anglia Square.• Future-proofing the city and local neighbourhoods through sound spatial planning.• Seeking to secure increased funding to support the city’s aims.• Working with our County Council partners to shape and maintain the city’s transport infrastructure.	<p>Group and apply learning to the economic development of the city.</p> <ul style="list-style-type: none">• Maximising opportunities from Devolution Deals and other investment funding opportunities to improve city and local neighbourhood economies.• Promoting Norwich’s business and research strengths.	<ul style="list-style-type: none">• Working with unions and other partners to attract high quality unionised jobs to the city, supporting and diversifying growth sectors to create and retain good, well-paid jobs.	<ul style="list-style-type: none">• Planning for how the economy will change in the future and supporting people to access good, sustainable jobs.• Working hard to help people receive all the income benefits to which they are entitled.
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What might success look like

- The city has grown and developed in an inclusive and sustainable way.
- Norwich is renowned as a leader for its culture and creativity.
- Tourism opportunities in the city are maximised through partnership working.
- Regeneration and development provide equitable opportunities to housing and jobs for people across the city.
- Through partnership working educational outcomes for young people growing up in the

- Our successful, inclusive economy is creative, innovative, and diverse.
- Greater retention of graduate entrepreneurs, supporting and incubating business start-ups.
- More diversity in our local economy, and an increase in the number of successful sectors,
- Closer collaboration between businesses and communities, which supports investment and develops skills.

- A wider range of job opportunities, including in our local neighbourhood centres
- in a diverse range of thriving industries.
- A higher-skilled and more diverse workforce achieved through collaborative working.
- People feel supported when navigating the job market or accessing work.
- Increase in the number of apprenticeships in Norwich City Council and our trading companies, as well as in wider Norwich where we have leverage through procurement/contracts.

- Incomes rise to deliver better living standards and longer life expectancy.
- Norwich is a 'Living Wage City' where the Living Wage is the norm, not the exception.
- There are lower levels of unclaimed benefits.
- A just transition to a greener economy replaces lost sectors.
- Norwich is a leader for growth in the emerging green economy
- Improved pay economy resulting in increased spending and economic growth.

city are more
equal.

Working draft

A fairer Norwich



<p>What we are aiming for</p>	<p>People have better health outcomes and longer life expectancy</p>	<p>Our city and local neighbourhoods are safe, diverse and vibrant.</p>	<p>Good quality homes for all</p>	<p>Tackle the root causes of disadvantage</p>
	<p>OUR FOCUS</p>	<ul style="list-style-type: none"> • Working with the County Council to increase opportunities for walking and cycling, making our streets safe and pleasant places for play and informal exercise • Increasing access to and inclusiveness of leisure opportunities, growing participation in sport and physical activity. 	<ul style="list-style-type: none"> • Building communities where everyone feels valued and connected, with good local amenities and strong cultural and social networks. • Working with VCSE and wider partners to empower communities to play a greater role in managing social, cultural and community assets. • Encouraging our cultural sector to connect with more people, reaching a wider and more diverse audience. • Celebrating diversity and driving inclusivity 	<ul style="list-style-type: none"> • Regenerating and decarbonising the council’s own housing stock over time and ensuring the best use of available land in the city, to meet the city’s housing aims. • Building and increasing the supply of good quality social and affordable homes. • Enabling and encouraging the building of innovative, low or zero carbon homes, • promoting schemes and leveraging funding for private homeowners to retrofit homes, and

<ul style="list-style-type: none">• Using our own services, our influence and working with our partners to:<ul style="list-style-type: none">- tackle the root causes of health inequalities.- close the divide on structural inequalities breaking cycles of disadvantage, poverty, and trauma.• Listen and be responsive to our communities and our partners.• Improve opportunities for more people to actively participate in their community and in the life of the city.	<p>that helps make Norwich a city in which everyone feels safe and welcome.</p> <ul style="list-style-type: none">• Making the city a safer place, by working with our community safety partners.• Looking after our own housing neighbourhoods well, improving estate safety through better design and making homes more affordable to live in.	<p>exploring innovative financing and modern methods of construction.</p> <ul style="list-style-type: none">• Working with landlords and our partners to significantly improve housing conditions and regulatory standards across the private rental sector.• Continuing to successfully work in partnership to reduce and prevent rough sleeping and homelessness, tackling the underlying causes.• Helping prevent homelessness by, taking ethical approaches to debt collection, and responding to the diverse needs of different people.• Lobbying, influencing, and seeking innovative solutions with partners, to prevent an increase in harmful nutrient	<p>increasing the availability of affordable renewable energy.</p> <ul style="list-style-type: none">• Continuing to prioritise our Financial Inclusion Consortium, with our voluntary and community sector partners.• Harness the economic leverage of local anchor organisations to tackle long standing systematic challenges and structural inequalities within the city centre and local neighbourhoods.
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		<p>levels around vulnerable watercourses (inc. Nutrient Neutrality).</p> <ul style="list-style-type: none"> • Where people have high or complex needs, taking a ‘Housing First’ approach (giving people who have experienced homelessness and chronic health and social care needs a stable home from which to rebuild their lives). 	
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<p>What success might look like</p>	<ul style="list-style-type: none"> • Reduced inequality divides with poverty levels falling across the city. • A reduced gap in life expectancy between communities, with a longer life expectancy for all. • Services and partnership networks are better targeted. 	<ul style="list-style-type: none"> • Clean, safe streets, as part of vibrant and diverse neighbourhoods. • Larger and more diverse audiences participating in creativity and cultural events. • Safe and welcoming public spaces across Norwich that celebrate of diversity. • People feeling safer in the city and local neighbourhoods. 	<ul style="list-style-type: none"> • Improved quality of homes across all tenures. • A deliverable programme of retrofitting. • High quality, responsive repairs, and maintenance for our tenants. • Increased levels of affordable housing. to 	<ul style="list-style-type: none"> • Reduced levels of poverty, with thriving communities. • Access to a wider range of jobs by working with partners to achieve this. • Skills are better matched to opportunity through
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- Increased access to needs-based services.

ensure access to quality homes.

- Our Local Plan housebuilding targets met or exceeded to improve provision and supply of homes.
- Warm homes in good repair to better support good health, including for those with specific needs.
- Greater job opportunities in construction and maintenance.

collaborative working with our education partners.

- Through partnership working support for children to get the best start in life.
- More equality of opportunity across the city.

Work

A climate responsive Norwich

What are we aiming for	A net zero Council by 2030	As a city, aiming for net zero Norwich by 2045	Vibrant parks and green spaces for all	Growing our capacity to adapt to climate change
OUR FOCUS	<ul style="list-style-type: none"> • Securing funding to deliver reduced emissions from our council fleet and other assets. • Changing the way we work to reduce emissions. • Procuring locally where viable and from low-carbon suppliers. • Becoming a cleaner city and delivering against increasing targets to reduce waste and fly tipping. 	<ul style="list-style-type: none"> • Using our planning powers to ensure new-builds are low carbon and energy-efficient. • Working with partners to encourage active travel across Norwich, by delivering infrastructure and supporting with education and information. • Enabling sustainable food for Norwich, with local food growing. Working to encourage and enable green jobs and training in emerging industries. • Improving public transport by working with partners and local providers to meet local needs and grow users. 	<ul style="list-style-type: none"> • Making our parks, and our green and blue spaces, fit for everyone to enjoy. • Improving physical recreation, sport, and leisure opportunities within our parks. • Growing the biodiversity of our open spaces, especially verges and riverbanks, and enabling a thriving wildlife. • Increasing space for nature, actively exploring long term alternatives to pesticides, protecting eco-systems, and helping to make waterways cleaner. • Embracing initiatives that support the 	<ul style="list-style-type: none"> • Using Norwich’s world-class research to predict likely climate impacts. • Enabling nature to recover and thrive across the city. • Working with partners to take direct action to increase the number of birds and wildlife, especially in species where numbers have reduced. • Bringing our communities with us by increasing awareness and changing behaviours to support the changing climate. • Working across the system to employ nature-based solutions

<ul style="list-style-type: none">• Increasing the levels of household recycling.• Gathering, maintaining and reporting data on our emissions.	<ul style="list-style-type: none">• Encouraging increased electric vehicle charging points across the city.• Supporting the city to transform its relationship with waste, through repair, reuse and sharing of goods.	<p>recovery of our wildlife and eco-systems.</p> <ul style="list-style-type: none">• Increasing ease of access to and through our parks and green spaces.	<p>to ensure ecological recovery.</p> <ul style="list-style-type: none">• Driving delivery of the Ecology Strategy and the council's own action plan.• Supporting the development of a new resilience plan as described in the next priority table to prepare the city for the future.• Increasing tree planting within the city to combat overheating.• Increasing the use of sustainable urban drainage to reduce flood risks.
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Work

What success might look like	<ul style="list-style-type: none">• A reduced carbon footprint across council services.• Environmentally conscious suppliers are supported by increased council investment and spending.• More local businesses adopting low-emission practices to secure contracts.• Increased recycling rates across the city.• The net zero targets set for the council and Norwich are achieved.• Working across the city with partners to improve air quality across the city with no special measures needed for the city centre	<ul style="list-style-type: none">• Norwich is renowned as a leader in the green economy and as a low-carbon city.• The city sees growth of its green economy.• A partnership approach is successful in lowering emissions across the city and improving air quality.• Increased use of public transport and active travel.• Lower proportion of household incomes spent on energy.• Employment opportunities are available in low-carbon jobs.	<ul style="list-style-type: none">• Improved mental and physical well-being through access to open spaces.• Greater participation in sport and physical activity• Higher footfall in our parks and green spaces, by all communities.• Increased biodiversity within our parks and green/blue spaces.	<ul style="list-style-type: none">• Climate change in Norwich is well-understood and supported in all communities.• Improved species diversity and abundance.• Communities continuing to thrive in the changing climate.• Infrastructure adapting to changing climate needs.• An increase in the tree canopy cover.
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A future-proof Norwich

What we are aiming for	Empowered communities	A city ready for change	Being equipped for new ways of working	Being prepared for future challenges
OUR FOCUS	<ul style="list-style-type: none"> • Providing support for community anchors and empowering community organisations. • Engaging better with communities in decisions that affect them, co-designing local solutions. • Partnering, enabling and listening to public sector, voluntary and charitable organisations. • Investing in prevention by anticipating future challenges and hardships 	<ul style="list-style-type: none"> • Delivering an efficient and effective planning function that is responsive to change. • Utilising our planning system to better shape a city of the future. • Being more responsive to the needs of the city, with citizen groups playing a leading role. • Supporting the local economy, with small and medium enterprises. • Identifying infrastructure 	<ul style="list-style-type: none"> • Working with our partners to deliver a well-connected city. • Collaborating with our partners to enable the upskilling of workers to match opportunities in the emerging economy. • Using our influence and lobbying powers for improved connectivity to and from Norwich, championing its position as a regional hub. 	<ul style="list-style-type: none"> • Working with partners to deliver a resilience plan for the city which will: <ul style="list-style-type: none"> - Mitigate the impacts of increased rainfall; - Map and mitigate the potential impacts of heat stress; - Prepare for floods, droughts, and extreme weather events; - Minimise our contribution to future shocks and mitigate against them; - Set out investment in infrastructure and

What success might look like

	<p>projects that align to local and national funding opportunities.</p>		<p>systems that help us adapt to the effects of climate change;</p> <ul style="list-style-type: none"> - Prepare a multi-agency response for emergency planning.
<ul style="list-style-type: none"> • More local management of city assets, for and by the community. • Active, strong community organisations, leading change. • Communities are empowered to act locally and long-term. 	<ul style="list-style-type: none"> • Streetscapes are more vibrant and busier, with fewer empty retail units. • More homes in repurposed properties. • Homes built in sustainable locations, close to jobs and amenities. • A robust pipeline of investment projects to support Norwich's long-term future. • Norwich consistently wins funding bids 	<ul style="list-style-type: none"> • Increased digital equality. • More effective, data-driven and joined up decision making. • New economic development opportunities. • A stronger talent pool that is matched to need. • A better-connected Norwich for communities and businesses. 	<ul style="list-style-type: none"> • Resilience increases in every community. • Potential impacts from natural or man-made threats are understood and mitigated. • Norwich successfully navigates both expected and unexpected changes. • Norwich is recognised as a safe place to live and do business.

	when opportunities arise		
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Working

An open and modern council

What we are aiming for	A collaborative council	A council delivering excellence	A council invested in its people	A data and insight driven; people focused council
	OUR FOCUS	<ul style="list-style-type: none"> • Encouraging civic participation by reaching out to the whole city. • Taking a partnership-focused approach to city leadership, collaborating to achieve common goals. • Growing involvement of partners in all sectors, building a co-ordinated approach and deliberate response to city challenges. 	<ul style="list-style-type: none"> • Delivering easier access to services and providing a consistently good customer service. • Ensuring all our services are accessible and value for money. • Co-designing services, making them responsive to the needs of the communities we serve. • Managing our spending responsibly and seeking best value options, taking safe but proportionate approaches to risk in performance, 	<ul style="list-style-type: none"> • Making sure we have an inclusive, high-performing, and motivated workforce that is diverse and representative of the city we serve. • Showing leadership on equality, diversity and inclusion across the council and city. • Upskilling our employees, creating pathways for bright and fulfilling careers. • Becoming a recognised employer of choice. • Maximising the wellbeing of our workforce – physical, emotional and financial.

<ul style="list-style-type: none">• Building regional, national, and international influence to campaign for the city and attract investment.• Recognising the importance of the voluntary and community sectors and be a willing and supportive partner.	<p>project and contract management.</p> <ul style="list-style-type: none">• Targeting services to prioritise those most in need.• Ensuring effective transparent decision making, scrutiny and governance.• Ensuring we have the right amount and right quality of workspaces and that they are carbon neutral and climate resilient by 2030.• As shareholder, working with our trading companies to improve quality of services to the city, ensuring value for money.• Reviewing the purpose of our Housing Delivery Company to ensure it is focussed and delivers for the city.	<ul style="list-style-type: none">• Supporting employees to consider equality in all their work.• Providing modern and collaborative working spaces.• Maintaining our status as a Living Wage employer.• Making it easier to get things done by adopting more consistent and well-communicated procedures and processes, with corporate services that work in partnership across the council to enable and support delivery.	<p>data and insight driven.</p> <ul style="list-style-type: none">• Reducing our carbon footprint by increasing digital communications.• Finding ways to work smarter for Norwich.
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What success might look like

- Active involvement across all sectors, with collaborative contributions to the city's challenges and outcomes.
- Greater involvement of local communities and the voluntary and community sectors in our work.
- The council is open and transparent.
- Skills and knowledge are shared with the private and public sectors, and our universities and emergency services to support common goals.
- A greater sense of community is fostered in local neighbourhoods and city-wide, with strong anchor organisations.

- Service delivery is coordinated and targeted.
- A responsive council, open to the co-design of solutions.
- People can influence change that matters to them.
- User-friendly, quality services.
- Improved feedback about council services.
- A financially stable council.

- The council recruits and retains employees with the training and skills needed to tackle complex challenges.
- Clear and meaningful council career paths.
- Council employees that better represent the people they serve.
- Employees motivated and enabled in their roles to achieve this plan and the 2040 City Vision.

- More people accessing digital services.
- Improved cost-effectiveness, driving better targeted services.
- Enhanced customer relationships.
- People-focused, data and insight driven, effective decision-making.
- A learning, continuously improving, well-run council.

Norwich in context: data and evidence

Information	Source
Norwich has the second-highest proportion of people outside London with a Trans or Non-binary gender identity.	Office for National Statistics – Census 2021
93.4% of residents in Norwich were classified as using various forms of IT in their everyday lives. This is 1.3% higher than the Norfolk average and 0.6% lower than the national average.	Digital Propensity Index for Census 2021 at local authority, region and country level, England and Wales - Office for National Statistics (ons.gov.uk)
Over the 5 years spanning 2017 to 2022, the population in Norwich grew by 1.7%, now estimated to be a total of 144,525 people.	Office for National Statistics - Population Estimates for England and Wales: mid-2022
<p>The largest ethnic group within Norwich is 'White', making up 87.1% of the population. This is followed by Asian, Asian British or Welsh (5.5%), Mixed or Multiple Ethnic Groups (3.1%), Black, Black British or Welsh, Caribbean or African (2.5%) and Other (1.8%).</p> <p>Those identifying as Eastern European represent 4.6% (6,650 people) of the Norwich population. The largest country of origin for people originating from Eastern Europe within the city is Poland (31% of those identifying as Eastern European), followed by Lithuania (24%) and Romania (23%).</p>	Norfolk Insight - Population Area Report – Norwich, except Eastern European population total derived from Residents born in Ukraine, Russia and Other Eastern European Countries LG Inform (local.gov.uk) – 2021 Census

Information	Source
Over the past five years, the council has had to find £13.1m to tackle the ongoing shortfall in its budget. This year, it needs to meet a £3.7m deficit in the funding it receives to continue delivering services.	Budget consultation 2024-25 Get Talking Norwich
Norwich ranks 294 out of 324 for worst social mobility* *The social mobility index comprises a variety of different metrics such as childhood conditions and parent/guardian educational attainment.	Social mobility index 2017, v1.1 (live.com)
Job density* has fallen to 0.9 in Norwich. This is the lowest it has ever been. * A job density of 1 means there is one job for every resident aged 16-64.	Norwich City Council's Economic Development Team
Workers in Norwich earned 12% less than the UK average in July 2023, equating to £82.30 a month less than when the cost-of-living crisis began.	Norwich City Council's Economic Development Team
Use of retail and recreation spaces in Norwich decreased by 32.9% from January 2020 to May 2021.	data-urban-centres-2021 - Key Cities (May 2021 relative to January 2020)
Since December 2022, the overall employment rate in the city has fallen by 3.8%	Economy and employment – map explorer – Norfolk Insight
From December 2020 to December 2022, the overall proportion of the Norwich population classed as economically active fell by 4.4%.	Economy and employment – map explorer – Norfolk Insight

High level equality impact assessment for strategic programmes

Programme title	Corporate Plan 2024-2029	Programme start date	21/02/2024
Team	Strategy	Directorate	Community Services
Senior leadership team sponsor	Helen Chamberlin	Role	Head of Strategy, Engagement & Culture
Officer completing	Joe Siggins	Role	Digital Inclusion Officer

What are the main aims or purpose of the programme?

In 2023, Norwich City Council's political and corporate leadership took the decision to review our existing corporate plan which was set to cover the period of 2022-2026. This was decided in light of the council's recent changes in leadership and the persistence of external challenges facing the city, such as those resulting from the cost-of-living crisis. In addition, it was agreed that the new plan should seek to ensure the council's priorities remain closely aligned with the priorities of the city's residents, businesses, support organisations and visitors. This has been achieved through an extensive programme of consultation, the feedback of which informs the new plan.

How does it fit with other services and policies, and how does it support our [corporate objectives](#)?

The refresh of the council's corporate planning document outlines the council's vision for the city, this being: 'Norwich: a fair and thriving city, full of ambition'. In addition to the overarching vision, which seeks to guide work the council undertakes and which, in turn, impacts the lives of many (if not all) of those who live, work and visit Norwich, the new draft corporate plan sets out how the council plans to work collaboratively with the communities it serves, delivering the ideas, addressing the challenges and creating the opportunities the people of Norwich have said they want to see. The plan highlights five priorities which were developed following comprehensive engagement with a wide range of stakeholders affected by the work of Norwich City Council as the local authority.

The new corporate objectives (as outlined in the Corporate Plan 2024-2029) are:

- A Prosperous Norwich

- A Fairer Norwich
- A Climate Responsive Norwich
- A Future-Proof Norwich
- An Open and Modern Council

As stated previously, a key objective in producing a new plan was to put the people of Norwich front and centre of its development. To achieve this objective, the council engaged expert consultation and engagement specialists to deliver an intensive programme of citywide resident and stakeholder engagement during November 2023.

The consultation was designed to provide the council with meaningful strategic insights into the priorities and needs of the communities it serves, with a specific focus on those priority groups identified in the council's new Equality, Diversity and Inclusion Strategy, for example, by focusing street engagement interviews in the Mile Cross and Earlham areas and holding roundtable sessions and one-to-one interviews with voluntary and community organisations representing relevant groups.

Activities included:

- Stakeholder interviews
- Workshops
- Panel discussion
- Focus groups
- Street outreach
- Online surveys

Further to a newly-established confidence that the council's priorities, used to guide our work over the coming 5 years, are in alignment with those of the people of Norwich, the plan also emphasises how such a clear 5-year plan helps the council and its partners move towards their collective vision for Norwich, as conveyed through the work of the [Norwich 2040 City Vision](#) partnership. The 2040 City Vision acknowledges the whole-city effort required if mutual aspirations are to be achieved.

What outcomes do we want to achieve, why and for who?

The scope of the council's new plan for 2024-29 is wide ranging and will certainly impact the people of Norwich in a plethora of ways and will include actions that work to address local inequality in all forms.

This new plan is developed with and for Norwich people. The council wants them to engage with it and to own it as much as it does; it wants to inspire collaborative working through the plan (with our stakeholders and local communities); and it wants its own workforce to understand and feel empowered and enabled through it.

As such, the council has focussed on the outcomes it (and all Norwich) wants to achieve. The outputs that will describe how the council will achieve those outcomes will be considered under the delivery planning components of the plan and sit in a separate document.

This approach enables the council to be more agile, and flex its approach to manage changing circumstances, whilst remaining focused on its end goals, achieving better outcomes for Norwich. It also enables the council to deliver a plan that will be better understood by the majority of those it works with and for, as well as those who work for the council itself.

Will anyone be disproportionately affected by the programme (customers, employees, those with protected characteristics or groups in the wider community)?

Norwich City Council's Corporate Plan 2024-2029 will guide the work of the council over the next 5 years, as it seeks to realise a city in which all people, regardless of their characteristics (protected by the Equality Act 2010 or otherwise) may thrive.

The delivery planning process, which will begin following the publication of the new plan, will initially focus on delivering the internal infrastructure needed to deliver the plan over its five-year period. This will see a set of activities, outputs and performance measures being collated and agreed in April 2024, and these in turn will inform the council's resource allocation for the 2024/25 financial year in the first instance.

As this set of activities and outputs is yet to be finalised, it is not possible at the time of writing the first iteration of this Equality Impact Assessment (EqIA) to state which (if any) group of people, be them customers, employees or anyone else, may be disproportionately affected by the actions the council will take to deliver its new plan over its five-year tenure.

As part of the equalities monitoring process, an EqIA will be carried out for the first set of outputs the council will seek to deliver in order to satisfy the vision and objectives outlined within the plan. Further EqIAs will be developed iteratively, as outputs and resource allocation are agreed.

If yes, will these be adverse impacts (specify whether high, medium or low impacts)?

N/A

If yes, can the impacts be	a) justified? N/A	b) mitigated? N/A
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What is the reason for the proposal or change (financial, legal etc)? *The Equality Act requires us to make this clear.*

The development of Norwich City Council's Corporate Plan 2024-2029 represents a timely opportunity to listen to and respond to the changing needs of the city, and to understand what matters to colleagues, residents and businesses across the city.

The new plan has been developed to ensure that Norwich City Council remains well informed and focused on delivering the services and outcomes the city of Norwich wants and needs over the next 5 years.

Officer completing EqlA	Joe Siggins	Date	08/01/2024
SLT sponsor	Helen Chamberlin	Date	09/01/2024
Equality lead (strategy team)	Nick Bodger	Date	08/01/2024

Appendix 5: Engagement Insights Report and Executive Summary

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Executive Summary

Corporate Plan 2024-2029

ES1 Subject to Cabinet endorsement on the 06 March 2024, Full Council will consider the council's Corporate Plan 2024-2029 on 12 March 2024. The Corporate Plan describes the vision for Norwich City Council, the services it delivers, and what it wants to achieve. The plan sets out the main priorities for the coming five years, and it informs everything the council does and how it plans.

Corporate Plan engagement

ES2 An intensive programme of citywide resident and stakeholder engagement ran throughout November and December 2023. The work was conducted by Collaborate CIC with support from colleagues at Inner Circle Consulting on behalf of Norwich City Council.

ES3 This programme of activity was undertaken to support the development of the new Corporate Plan for the period of 2024- 2029. It sought views from the public, businesses, and organisations about the city and how the council might help to realise ambitions and mitigate challenges. By listening and learning from the feedback received and by working in partnership, the Corporate Plan will help to unlock the city's true potential and deliver against the priorities we share.

- ES4 Over 900 people and organisations contributed their views through engagement activities, and evidence including:
- a. Stakeholder interviews
 - b. Workshops
 - c. Panel discussions
 - d. Focus groups
 - e. Street outreach
 - f. Online surveys
 - g. Data gathered from previous community conversations and consultations
 - h. Other extant and relevant data sources.
- ES5 Questions asked included:
- a. What do you like most about Norwich?
 - b. What do you see as the main challenges facing the city and the people who live and work here?
 - c. What do you see as the areas of greatest opportunity for Norwich?
 - d. What changes would you most like to see in the city?
 - e. How should Norwich City Council work alongside partners to make these changes?
 - f. What are the three most important things you'd like Norwich City Council to focus on in the coming years?
- ES6 Paper copies of the survey and alternative accessible formats were available on request. There was an Easy Read version of the survey on Get Talking Norwich. The engagement activities were widely publicised through media, social media and communications with the public, including partner organisations, businesses and other stakeholders.

Scope of this report

- ES7 This report describes the methodology and presents the findings of the engagement programme which have shaped the new Corporate Plan for 2024-2029.

How the report will be used

- ES8 This report, which sets out the engagement findings, has been considered as final proposals are developed by officers to put to Cabinet to recommend to Full Council on 12 March 2024. Decisions will be published through normal procedures for Full Council and Cabinet at www.norwich.gov.uk/democracy

Key Findings

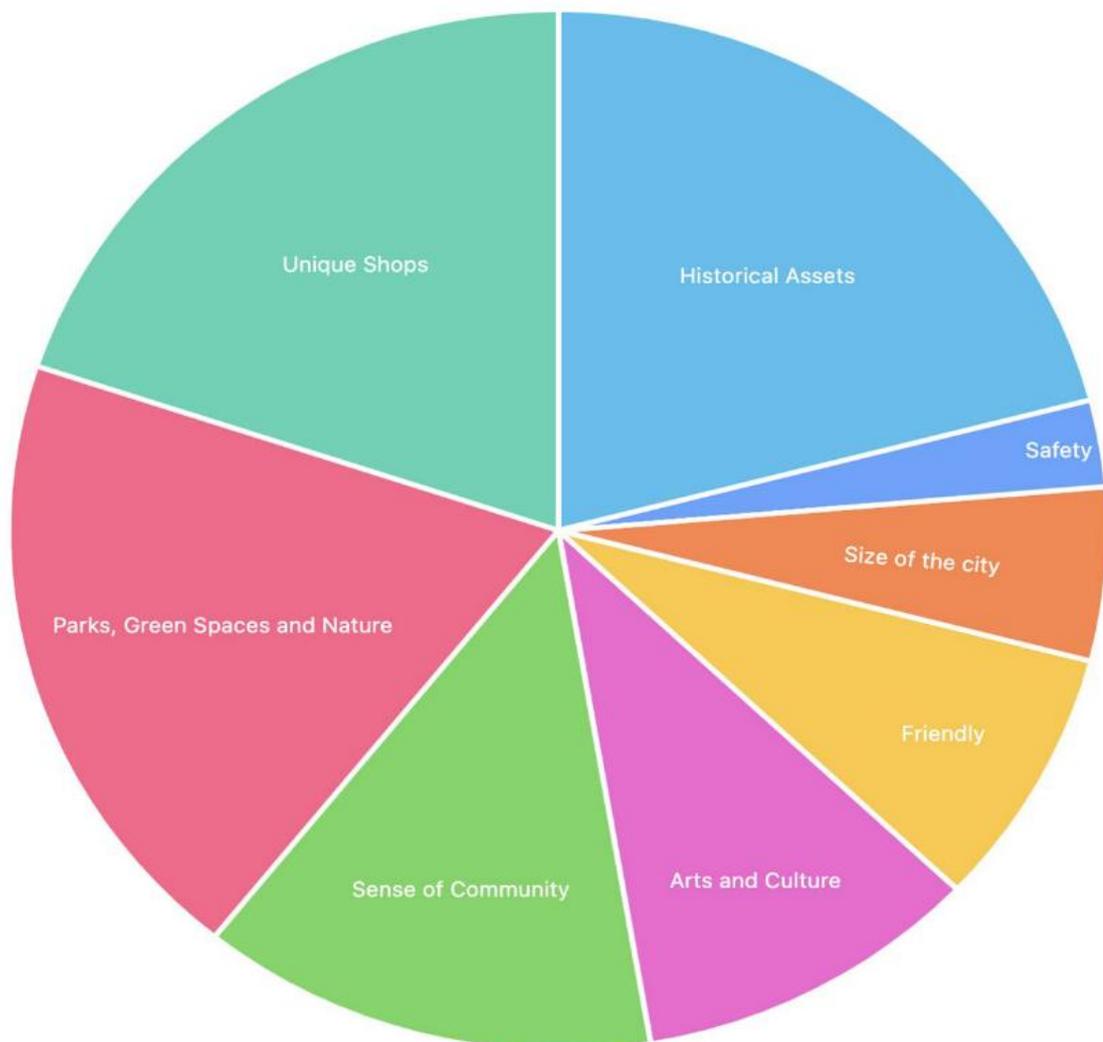
- ES9 26 structured interviews were held with people from business, civil society, and the public, creative and cultural sectors, as well as three focus groups for the voluntary and community sector, creative and cultural organisations and for Community Connectors and Conversation Officers.

ES10 Voluntary, community and social enterprise (VCSE) organisations represented the experiences and needs of disabled people, women experiencing domestic violence, refugees, people experiencing housing and financial vulnerability, young people, older people, people using food banks, and some faith groups.

ES11 138 people engaged in face to face on the street conversations in the city centre, around Anglia Square, in Mile Cross, Earlham, and Lakenham between 15 and 23 November 2023. In the main people lived or worked in Norwich, with some commuting in from surrounding districts or counties. Characteristics of interviewees can be found from point 13 of the main report.

ES12 Three surveys were released on Get Talking Norwich from the 1 November to 30 November. There were 690 responses to the public surveys, and the [‘Tell us about Your Norwich’ map-based survey](#).

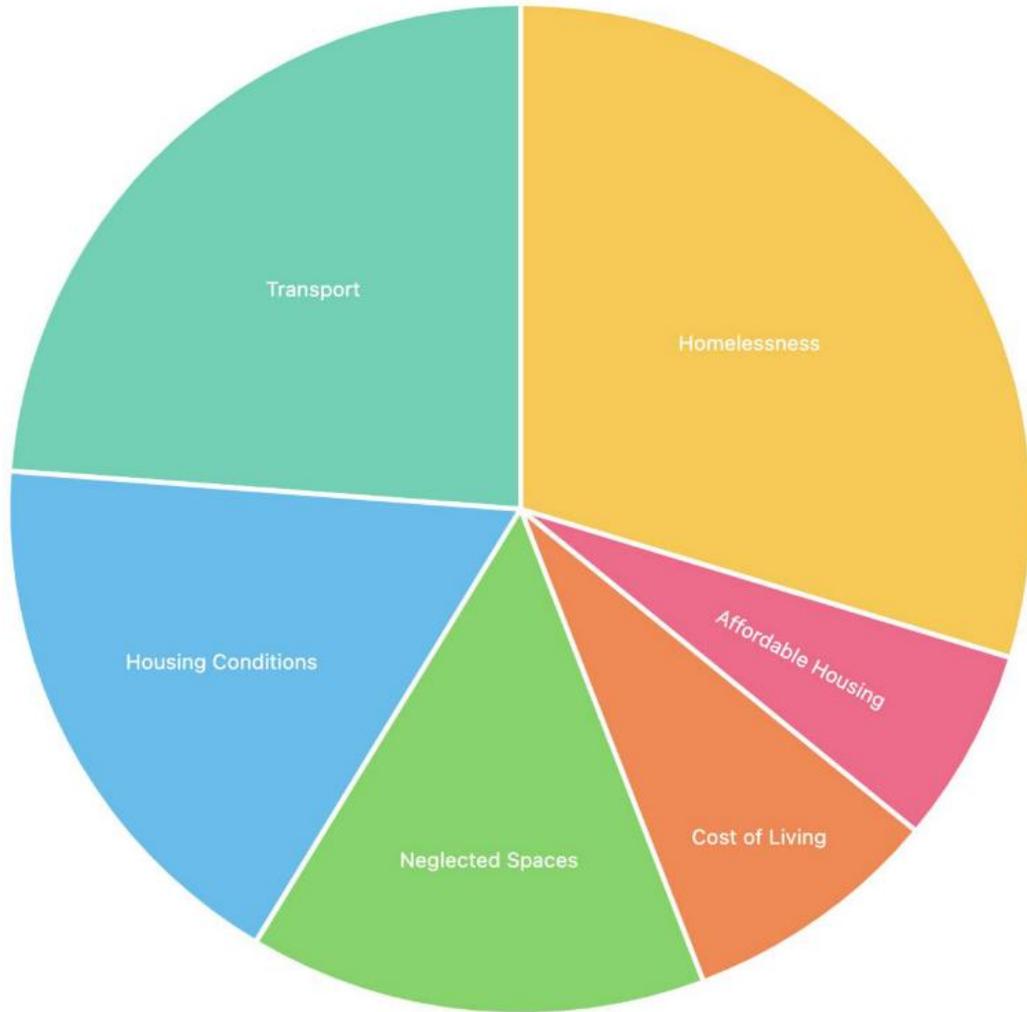
ES13 The chart below shows what people from the public survey said they like most about the city:



ES14 Feedback from across the engagement activities on what people like about Norwich includes:

- a. It's a good place to live and raise a family, with plenty of activities and access to the coast and green spaces.
- b. It's a good place to work, with higher wages than in surrounding areas. Lifestyle helps attract and retain talent.
- c. Universities provide the city with research and data, attract new people, and help build a youthful, skilled workforce.
- d. It's welcoming, friendly, neighbourly, and inclusive and generally feels like a safe place to be. Quirkiness and individuality give it a distinctive personality.
- e. It's compact, walkable, and beautiful with unique shopping options, historic buildings and institutions and a thriving arts and culture scene.
- f. Housing is more affordable in Norwich than London and other cities. Social housing and the role the council plays as a landlord is valued.
- g. Community and faith organisations offer spaces and support for the most vulnerable and create volunteering opportunities.
- h. It's a collaborative place, where people are good at getting things done together; the size of city helps people build relationships across sectors.

ES15 The chart below shows what people from the public survey think are the main challenges facing the city:



ES16 Feedback from across the engagement activities on areas where people want to see action include:

- a. inequalities
- b. jobs and the economy
- c. safety, inclusion, and accessibility
- d. the built environment and redevelopment
- e. housing
- f. more collaboration with communities
- g. more collaboration across the city and county

Report

Introduction

1. Subject to Cabinet endorsement on 06 March 2024, Full Council will consider the council's final recommended Corporate Plan 2024-2029 on 12 March 2024. The Corporate Plan describes the vision for Norwich City Council, the services it delivers, and what it wants to achieve. The plan sets out the main priorities for the coming five years, and it informs everything the council does and how it plans for the future.
2. An intensive programme of citywide resident and stakeholder engagement ran throughout November and December 2023. The work was conducted by Collaborate CIC with support from colleagues at Inner Circle Consulting on behalf of Norwich City Council.
3. This programme of activity was undertaken to support the development of the new Corporate Plan for the period of 2024- 2029. It sought views from the public, businesses, and organisations about the city and how the council might help to realise ambitions and mitigate challenges. By listening and learning from the feedback received and by working in partnership, the Corporate Plan will help to unlock the city's true potential and deliver against the priorities we share.
4. This report describes the methodology and the feedback received which has been synthesised with previous engagement outputs and used to shape the new Corporate Plan 2024-2029.
5. The findings have been grouped by theme and take account of what was said during the engagement activities, and other outputs as described at point 35 of this report. Appendix 6 provides a summary of the findings provided by the independent research company.

Methodology

6. The engagement programme took a relational, qualitative approach rather than a statistical, quantitative one. The people interviewed and who took part in the engagement activities were recruited based on being broadly representative of the key audiences: community groups and third sector organisations, businesses, public sector, and local government organisations. Open engagement methods, including online surveys and street-based outreach were used to gain the views of residents, and other users of the city.
7. Engagement activities included:
 - a. Stakeholder interviews
 - b. Workshops
 - c. Panel discussions
 - d. Focus groups
 - e. Street outreach
 - f. Online surveys

8. All the conversations started from an appreciative perspective, inviting participants to connect with what they value about Norwich in order to foster positive relationships and invite people to build on potential. As with all engagement activities, the researchers were reliant on people's availability, ability, and appetite to get involved.
9. The researchers encountered some 'consultation fatigue', in which people who had taken part in previous activities were keen for insights previously gathered to be used. The researchers reviewed and assimilated data from the City Vision consultations, conferences and workshops, the latest budget consultation (2024-2025), partner-led stakeholder workshops and from the community conversations programme supported by the council's Community Enabling Team and Shoebox Enterprises CIC.
10. The engagement was structured, in that pre-determined questions were asked, but exploring and capturing emergent ideas and feedback was also welcomed. Questions asked included:
 - a. What do you like most about Norwich?
 - b. What do you see as the main challenges facing the city and the people who live and work here?
 - c. What do you see as the areas of greatest opportunity for Norwich?
 - d. What changes would you most like to see in the city?
 - e. How should Norwich City Council work alongside partners to make these changes?
 - f. What are the three most important things you'd like Norwich City Council to focus on in the coming years?
11. Direct engagement was encouraged from colleagues, elected members, residents, partners, key stakeholders, and wider service users. The online survey was promoted widely throughout the time it was live via a number of channels and methods. These included publishing a news article on the council's website, social media posts, issuing a news release to the local media, text message bundles, internal colleague-wide promotion, and external partner-wide promotion.

Who we heard from

12. Over 900 people and organisations contributed their views through the engagement activities.
13. **In-depth conversations** comprised 26 structured interviews representing business, civil society, and the public, creative and cultural sectors. In addition, Collaborate CIC undertook three focus groups with people from voluntary and community sector organisations (VCSE), as well as creative and cultural organisations, and considered insights gathered from the council's Community Connectors and Conversation Officers.

14. VCSE organisations represented the experiences and needs of disabled people, women experiencing domestic violence, refugees, people experiencing housing and financial vulnerability, young people, older people, people using food banks, and some faith groups.
15. All participants were invited to be candid, on the basis that contributions would be anonymised and any quotes non-attributable. To facilitate this, no demographic data was captured.
16. Our **street engagement** comprised interviews with 138 people from across the city, with groups and individuals interviewed outdoors and indoors, in cafes, community spaces, and at bus stops, libraries, shops and school gates.
17. Some demographic information was recorded for the on-street engagement, but it was not possible to gain accurate demographics across the piece, noting that submission of such information was voluntary.
18. However, engagement can be generally described as with more women than men, and more older people (40+) than younger people. This included some sixth-formers, university students, parents of young children and pensioners as well as many working age adults.
19. Many of those consulted on-street had some sort of physical or mental health condition, but fewer people had an identified disability; some were experiencing insecure housing or were previously homeless.
20. Most interviewees were of White British ethnicity, but people of Polish or other Eastern European backgrounds, and those from African and Asian diaspora origins including migrants and Black British people, were also interviewed.
21. In the main, people lived or worked in Norwich, with some commuting in from surrounding districts or counties. As per above, given the limited demographic data, we have not broken-down views by identity or position.
22. There were 690 responses across three **online surveys** on [Get Talking Norwich](#): one aimed at council staff, a public survey, and an accompanying [map-based survey](#) where people were invited to add a pin to the map to show us:
 - a. *What you are doing and what you value.*
 - b. *What do you love about Norwich.*
 - c. *What ideas do you have that can make Norwich even better.*
23. **Norwich City Council staff engagement** included three focus groups with staff representing different teams and levels of seniority/tenure; three 'playback sessions' with senior managers; and an all-colleague survey, hosted on Get Talking Norwich and promoted throughout November.
24. All participants were invited to be candid, on the basis that all contributions would be anonymised and any quotes non-attributable.

25. **Insights from previous Community Conversations** were also gathered. This included data that has been collated from conversations by Community Connectors and Community Conversation Officers since 2022. The conversations came from six areas:
- Heathgate / Mousehold / Cowgate
 - Lakenham
 - Mancroft
 - Mile Cross
 - North Earlham
 - West Pottergate / Russell St.
26. Consultation with **council tenants** included a 90-minute focus group with four council tenants, all of whom are involved in tenants' associations. In addition, council tenants and some people who live in private rented accommodation were consulted during the street engagement activity described above.
27. As per above, participants were invited to be candid, on the basis that all contributions would be anonymised and any quotes non-attributable. To facilitate this, demographic information was not requested.
28. **Member and partner consultation** comprised four workshops with elected members and one with partners and cabinet. Those unable to attend in person were invited to submit responses by email. The workshops comprised individual group sessions for:
- Cabinet
 - Labour group
 - Opposition group (Greens and Liberal Democrats)
 - City vision partners and cabinet (joint)
 - The Climate and Environment Emergency Executive Panel
29. As the city's future workers, parents, and leaders, it was important to consider the views of **young people** in shaping the plan. However, consultation with a representative of Norwich's main charity supporting young people (Mancroft Advice Project, MAP) revealed that the council would need to engage with a wide number of young people in order that feedback was representative and meaningful.
30. Instead, MAP advised that young people will not have changed their priorities since the work undertaken to inform the City Vision. Thus, in response, that consultation was used as a basis for engagement, ensuring that views were captured in the plan's development.
31. It is worth noting that the consultation process revealed a strengthening consultation fatigue developing amongst young people as well as amongst other consultees. It is hoped that this may be addressed as the delivery

planning process and performance framework are developed. Within these processes lies the opportunity to engage and excite the input of all user groups by feeding back to people and actively linking the council's actions to the responses received from consultation.

32. A representative of MAP was consulted as part of the individual stakeholder interviews described above, and the priorities expressed by young people during the consultation period for the City Vision 2040 have been incorporated into the development of the plan as advised.
33. Data about the demography of respondents to the engagement activities was invited voluntarily and then anonymised. This enabled franker and more meaningful discussion. As a result, any data gathered cannot be linked to comments and so cannot be used to weight the ideas of any particular audience or group.

Additional Data

34. In synthesising their final findings, the research consultants also considered the following information and incorporated it into feedback, so helping to provide as informed a view as possible:
 - Norwich 2040 City Vision
 - Corporate Plan 2022-26
 - Other council policies, plans and strategies
 - Equality Information Reports from 2016-2023; the draft Equality, Diversity and Inclusion Strategy and the public consultation for this strategy
 - The final report of the LGA Corporate Peer Challenge 2023 and the council's response to LGA recommendations
 - Data derived from the Get Talking Norwich engagement platform
 - Budget consultation 2023/24 analysis – full report
 - Norwich 2011 to 2021 census overview
 - Norwich headlines March 2023 – internal briefing paper
 - Norwich headlines August 2023 – internal briefing paper
 - Findings from City Vision 2017-18 engagement exercise
 - Data from the City Vision Youth Conference in May 2018 and the City Vision Youth Survey undertaken in the same year.
 - The final report of the Norwich Good Economy Commission
 - Norwich Reducing Inequality Target Areas – analysis of indicators October 2022 (a Norfolk Office of Data and analytics (NODA) report)

Findings

35. This section of the report provides a synthesised version of the findings from across all the engagement activities, and other engagement outputs, as set

out above. At the end of this section of the report, a table shows how what people have said has influenced and informed the content of the new plan by mapping the feedback against the priorities and aims of the new plan.

36. A summary of the findings provided by the independent researchers is appended to this report.

Environment

37. The findings show that there is clearly a need to protect the city and its environment. References to the environment are woven throughout the findings, as they cut across many of the themes identified, and therefore are not grouped in one specific section. However, the council acknowledges the importance of driving change in this area, which is reflected by the priority **A climate responsive Norwich** in the new plan. Continuing to tackle the climate emergency is vital, with the aim of becoming a net zero council by 2030 and working collectively with city partners for a net-zero Norwich by 2045.
38. Decisions made by the council will consider and mitigate the impact on the climate and biodiversity. There is a firm commitment to protect and enhance the city's outstanding parks, green and blue spaces, and our natural environment, so they are vibrant and accessible to everyone, and places where wildlife thrives.
39. The focus will be to work with our partners, including the County Council, towards a better-connected Norwich, linking communities to communities and people to opportunity. The ambition is to work together to help make Norwich an exemplar city for digital connectivity and inclusivity.

What people value about Norwich

40. Overall, people described Norwich as a good place to live and work, with many having returned to raise families. The physicality of the place is important - it's compact and walkable, nothing feels too far away. But it's also easy to access the countryside and the coast.
41. Culturally, it's perceived as welcoming and inclusive and generally it feels like a safe place to be. People are proud of Norwich's quiriness and individuality - it feels like a place with a personality that's very distinct from Norfolk as a whole.
42. Physically, the built environment has been praised – Norwich is seen as a beautiful place, with world-class heritage that people love but are also pleased by the way new buildings have been added to the mix. It's a place with plenty of green space and parks which are particularly appreciated by those with families.
43. Norwich offers lots of things to do - from a vibrant blend of independent shops and big brand stores to live music, theatre, comedy, and a great food offer.

Economically, these factors contribute to the ability of businesses to offer a lifestyle that helps attract and retain staff. For some bigger businesses the proximity to London is also a bonus as they can attract talent from further afield. The universities are seen to benefit the city, attracting students, and helping build a youthful, skilled workforce for the growing science and technology cluster.

44. Some partners describe Norwich as a collaborative place, good at getting things done together. The size of the city is again a factor, helping people build relationships across sectors. A common sense of pride also unifies people, making them want to get involved in improving things.
45. People described Norwich as a progressive place, with a high level of engagement across sectors and an appetite to work together to make the city a good place for everybody. The Stirling Prize was highlighted as an example of the level of achievement and recognition of which the city is capable.
46. Norwich City Council was praised for caring about the work it does and the people it serves. It is appreciated that the representative flags are flown at City Hall and that efforts are being made to connect with communities through the community connectors. The Living Wage campaign and Good Economy Commission are also seen as positives. It's appreciated that Norwich has managed to keep a significant stock of social housing.
47. Business partners spoke of collaborating well with the council in the past. The development of the [Norwich 2040 City Vision](#) is seen as a good example of working together across sectors and engaging widely. Building relationships in this way created a platform to produce the Town Deal, and the Business Improvement District has widespread approval.
48. Some local health partners report a very well-established close working relationship with the council having worked together on health inequalities over many years. The Interact Project is seen as a good example of effective operational integration between health, the council and VCSE partners, providing a good foundation on which to build for the future.

What people see as the challenges for Norwich

Inequalities

49. Whilst many people view Norwich as a good place to live and raise a family, with plenty of activities and access to the coast and green spaces, they also feel that there is a significant wealth gap in the city. Many people are well off and able to enjoy all that the city has to offer, but in some communities, there is entrenched poverty, with some families stuck in a generational cycle of poor educational attainment and low income, insecure work, or unemployment.
50. People said that it is not difficult for well-off people to avoid seeing the poverty, and so it's easy to ignore and for nothing to be done about it. Although it was

acknowledged that recovering from COVID and coping with the cost-of-living crisis are national challenges, there is data to show that some populations in Norwich are disproportionately affected and in need of more and better help.

51. There are increasing numbers of people in deep poverty and reliant on food banks and benefits, who feel unseen and unsupported by the authorities. Many people are living with high levels of debt, including a disproportionate number of people living with disabilities and long-term health conditions. There are long waiting lists for mental health support and in some areas, it is impossible to get dental treatment, with some people resorting to DIY fillings.
52. There is a call for the council to support people's mental health across all age groups, but particularly for young people, with a lack of confidence and mental health challenges seen to affect their employability and life chances.
53. Multiple interviewees mentioned a 'lack of aspiration' among young people, but others challenged this framing. Instead, they believe some people are less confident about how to navigate systems to find and take up opportunities, so they and their families need more help to find the right pathway.
54. People would like the council to:
 - a. Address social deprivation holistically and collaboratively, with partners and across services.
 - b. Help people increase benefits income and reduce debt through advice and guidance.
 - c. Focus on Reducing Inequality Target Areas (RITA) and build on the good work already done, to reduce health inequalities and improve levels of social mobility.
 - d. Build on the award-winning social prescribing model.
 - e. Develop a much more sophisticated collective data sharing and analysis capability to guide decision-making.

Inclusion and accessibility

55. Whilst many people feel that Norwich is welcoming, friendly, neighbourly, and inclusive and generally feels like a safe place to be, some sections of the population have a different experience. Disabled people find Norwich difficult to navigate, describing many access problems on buses, and expensive parking. Disabled people find it harder to get jobs in Norwich and there is a lack of adapted housing.
56. There is a sense that Norwich is not keeping up with its changing diversity, with some black people feeling less welcome and included, experiencing racism in schools, and feeling unsafe on public transport.
57. In the outer estates, people are concerned about rising violence, anti-social behaviour, drug use and dark streets at night. People spoke of incidents of hate crime against disabled, gay, and homeless people in Norwich.

58. Poor transport options add to the inaccessibility to the city centre, with the disabled in particular needing to rely on cars to access Norwich but feeling that this isn't recognised or well supported.
59. The historic city centre doesn't lend itself well to the needs of those with disabilities, but it is believed that accommodations could be made if there was greater awareness and appetite among decision-makers, and a more active and equitable relationship between access groups and planners. People reported a general lack of disability infrastructure around the city; a lack of disabled parking; ramps into buildings; and safe crossings. Of particular concern are road layouts that put disabled people in a shared space with vehicles, and Beryl e-scooters left in places where they become hazards.
60. Digital exclusion is a significant concern, with a sense that the council is trying to cut costs by pushing its services online, without recognising that for some people (and with some issues) this will never be a viable option. A choice of online, telephone and face-to face contact is preferred. Having a dedicated inclusion team is seen as important to ensure there is clarity over responsibilities, consistent contact points and in-house expertise.
61. People would like the council to:
- a. Consider the needs of disabled people better in housing, transport, job support and access to the built environment.
 - b. Celebrate increased ethnic and racial diversity, along with LGBTQIA+ identity.
 - c. Take stronger action on race hate crime and race discrimination.

Jobs and the economy

62. Whilst many people view Norwich as a good place to work, with higher wages than in surrounding areas, it is reported to be an expensive place to live with increasing housing costs but low rates of pay. People are concerned that the economy doesn't work for everybody in the city and that employment opportunities are limited. They feel that the gig economy is increasing the number of low paid, insecure jobs, while the Living Wage Campaign has 'stalled'. There is a desire for low wage employment to be safer and more secure; for high wage employment to be more accessible for women and other underrepresented groups, and for more employment opportunities that help retain graduates.
63. People recognised the importance of the independent business sector in Norwich and want to see them supported to thrive. They want to see empty shops used for business startups, people helped to start businesses, and the city promoted to visitors and made accessible so that these businesses can do well.
64. Some people had experience of the difficulties facing businesses in recruiting skilled staff for available vacancies and want to see appropriate organisations do more to train people to fill these vacancies.

65. In general, people want a more joined up approach to helping young people develop the right skills for the high skilled, well-paid jobs of the future. This includes improvements to the careers advice offered and better links between skills development and training to opportunities in low carbon construction, hospitality, caring and retail.
66. People believe that building skills in sustainable development and low carbon construction will also support the drive to tackle the city's carbon footprint. There is a strong desire to grow a fair, low-carbon, 'good' economy in line with the image of Norwich as an independent and progressive city - but putting this into practice needs a clear strategy.
67. Norwich is seen as geographically isolated, "out on a limb", making it harder to attract investment. Some business partners believe better transport infrastructure is needed to attract big business, particularly better road and rail links to London and the Midlands. Others highlighted the lack of a high quality, high-capacity venue for conferences and concerts, and 5-star accommodation that would draw more people into the city for longer, higher value visits.
68. It was raised that there is the opportunity to recognise the value of Norwich's vibrant social enterprise sector and to promote values-aligned employment.
69. People from across the city spoke of the need to recognise, celebrate, and publicise the many strengths that Norwich has. There is frustration about being a "hidden gem" and a desire to create an ambitious, aspirational "story of Norwich" to attract inward investment and businesses to relocate, to recruit and retain new employees and make a case to central government for funding.
70. People would like the council to:
- a. Focus on developing a truly inclusive economy, including pathways to growth for all the areas within the city/local area.
 - b. Create a brand story to attract visitors and businesses with its unique blend of history, progressive action, and world class cultural offer.
 - c. To use convening power to build connections within the business community, particularly between start-ups and potential investment opportunities.
 - d. Work to attract more high-tech and science sector businesses to the city.
 - e. Prioritise connectivity and accessibility to enable commuting, leisure, tourism, and access to services. The city needs much better public transport, cycle routes and more Park and Ride.
 - f. Advocate for better rail and road connections to London and the Midlands.
 - g. Grow the creative and cultural offer, strengthening collaboration between the council and the arts and cultural sector to develop a more strategic approach.

Built environment and redevelopment

71. While many people view Norwich as compact, walkable, and beautiful with unique shopping options, historic buildings and institutions and a thriving arts and culture scene, how the city is redeveloped is a major concern, although in different ways.
72. Many reported the city centre as in decline, with shops closing, litter and more people sleeping rough; clashes between pedestrians, e-bikes and scooters and badly thought-out street furniture. Many believe empty retail space should be repurposed to address the lack of housing or for community use.
73. There's a desire for a range of new housing to be built, not just luxury homes. And there's much pride in the Stirling Prize-winning Goldsmith Street development, which many see as an approach to be followed further. There's a fear of low quality, "identikit" estates, and of high density, overly tall developments. And equally there are fears that gentrification will price people out of their neighbourhoods and remove highly valued community shops and resources.
74. Many expressed the need for more community spaces.
75. Universally, public transport comes in for heavy criticism. Buses are reported to be old, unreliable, dirty, slow, and expensive with limited operating hours, making them impossible to rely on to get to work and limiting people's access to activities on Sundays or in the evening. The unreliability of public transport is seen to be increasing car use and creating traffic congestion, leading to long delays.
76. Drivers complain about feeling pushed out of the city by parking costs and roadworks, but with no viable alternatives, especially for commuting and for leisure visits in the evening. Cycling is seen by some as a possible alternative but for many it is thought too dangerous. Responses to new cycling infrastructure are largely positive but some layouts are incoherent and disjointed, adding to feelings of lack of safety.
77. There is a real demand for improvements in public transport and sustainable transport options, including the need for another Park and Ride on the east side of Norwich. We heard this from everyone: shoppers, commuters, pensioners, disabled people (who rely on buses). People also recognise that Norwich is a walkable city and feel that more can be done to promote walking and make it easier to navigate the city.
78. We heard that people want to see Norwich's assets protected - its heritage, parks, rivers, and green spaces, whilst also being imaginative about future development and bringing new modern buildings and architecture into the mix. People want the Anglia Square redevelopment to go ahead quickly too [since the engagement took place, the developers, [Western Homes, have cancelled their plans to redevelop Anglia Square](#)].

79. There is concern that Norwich's environment is under threat, with mentions of river pollution, fly tipping, litter, and traffic pollution.

80. People would like the council to:

- a. Support active transport choices by making cycling infrastructure more coherent and safer, and improving conditions for pedestrians.
- b. Explore transport innovations - including using disused railways to support light rail/guided buses.

Housing

81. While it is understood by many people that housing is more affordable in Norwich than London and other cities, housing in particular illustrates what some called the "chasm between the haves and have-nots". The lack of suitable, affordable housing was mentioned many times. Along with limited temporary accommodation, which means some residents are sent out of the area while they wait for a homeless decision, and some families are temporarily housed alongside those with significant substance misuse problems.

82. The city centre is seen as distinct from the estates on the outskirts, with the majority of investment being in the centre and the estates suffering from an impoverished, neglected public realm - particular examples include a lack of play-space, rundown stairwells, fly tipping and overgrown verges, hedges, and communal land. The people who live on these estates feel cut off from the city centre, along with all the attractions and opportunities it has to offer. This is due in part to barriers such as public transport.

83. For many the private rented sector is problematic, with intense competition for properties, high rents and often poor-quality accommodation offered by landlords who neglect their responsibilities. Some people questioned the impact of student accommodation on housing supply for residents and of transient tenants on community cohesion.

84. Having retained a large stock of social housing is seen as a positive about the city. However, council tenants relayed a number of significant issues, particularly around allocations, empty properties, and maintenance. Core to all the issues is a sense that communication and contact with the council is too difficult. It was noted that there is a drive to digitalise contacts, but this is a significant barrier to those who are unable to get online.

85. Maintenance issues are felt to be very poorly handled, with long waits, poor quality work and lack of consideration for tenants' feelings of safety. There are seen to be many unallocated properties sitting empty for significant periods of time, which is resented, particularly by those who experienced long waiting lists for homes.

86. People would like the council to:

- a. Ensure all housing within the city is safe, liveable and energy efficient, improving living conditions and cost of living through retrofit, better maintenance, and licensing of private landlords.
- b. Build on flagship sustainable housing to link housing stock improvement, decarbonisation, and developing future skills, to drive market demand for commercial retrofitting.

More collaboration with communities

87. While many people recognise that community and faith organisations offer spaces and support for the most vulnerable and create volunteering opportunities, funding is an ongoing problem, with many struggling with rising costs for renting and running the spaces they need and difficulty recruiting volunteers. This is compounded by rising demand as these organisations are supporting increasing numbers of people, many with multiple and complex needs, including mental health issues and homelessness.
88. The sector wants better and more consistent, strategic engagement with the council and are keen to step up as partners, provided there is realism about what they can do and good commissioning processes which encourage cooperation. VCSE organisations hold large amounts of data that could help build a more rounded picture of residents' needs and want the ability to share this in support of collective decision-making.
89. Residents recognise the council is stretched and are willing to step up and do their bit. They want the council to facilitate this through grants, encouragement, access to council buildings and permission for people to solve problems and take care of their local area. The council's Community Conversations programme is seen as a good starting point to develop stronger relationships with communities and understand the opportunity for greater levels of neighbourhood working.
90. People would like the council to:
- a. Empower local communities to unlock support at the hyper-local level.
 - b. Build and develop greater community cohesion through asset-based community development.
 - c. Overcome consultation fatigue by building better long-term relationships with communities, actively seeking to better understand their needs; involving residents in decision-making processes and developing co-production approaches to service design.

More collaboration across the city and the county

91. Many people shared the view that Norwich is a collaborative place, where people are good at getting things done together. The size of the city helps people build relationships across sectors. However, despite positive experiences of collaboration in the past, some in the business community feel that the council has in recent years felt like it has turned more inward-looking.

92. The Norwich 2040 City Vision Partnership provides an established collaborative platform on which to build and shows a strong appetite among partners to work together for the benefit of all, with an opportunity for greater and more equitable involvement of the VCSE.
93. There is recognition of the challenges of having a two-tier local government system, but people see a need for much stronger alignment and collaboration with neighbouring and overlapping local authorities. Many people referred to the relationship between the city and county councils as “problematic”. For some this was seen most clearly in disjointed services, e.g. people in need of both housing and social care support can “fall through the gaps” between the two councils’ services. It is recognised that the two councils are led by different political parties, but people expressed a strong desire for this not to get in the way of working more closely together.
94. In particular there is a clear ask of the city council and county council to work to solve problems together that aren’t always within its direct power, for example, transport, education, public realm, and social care. People feel that the county council has gaps in its knowledge of Norwich and working more closely with the city council could help bridge those.
95. People suggested the city council could be working more in partnership with organisations supporting communities in the city.
96. Norwich has a very strong arts and culture offer, which is appreciated by residents, attracts visitors, and is also recognised nationally and internationally. The sector would like to see the city take a more strategic approach to support and develop the creative and cultural sectors, with a new cultural strategy aligned to the corporate plan.
97. People would like the council to:
- a. Reinvigorate the Norwich 2040 City Vision and support the partnership to make stronger collective commitments to action.
 - b. Build on the history of effective collaborative working to reconnect with business and VCSE sectors as key partners.
 - c. Use convening power to help organisations to align and do more together, supporting connection and collaboration across the whole place.
 - d. Further develop operational integration between council, health, and VCSE partners.
 - e. Grow the creative and cultural offer, strengthening collaboration between the council and the arts and cultural sector to develop a more strategic approach.
98. It is clear from the findings that there is much to protect and enhance to ensure our city remains exceptional as well as meeting the challenges head on and planning for the future.

Resident and stakeholder insights report

Executive Summary

Prepared for Norwich City Council by Collaborate CIC

January 2023

Page 88 of 302

collaborate
for social change

What

- Summary of collated insights from the public, gathered through an intensive programme of citywide resident and stakeholder engagement Nov-Dec 2023.
- Conducted by Collaborate CIC with support from colleagues at Inner Circle Consulting on behalf of Norwich City Council.

Why

- Undertaken to inform the new Corporate Plan 2024- 2029.
- Designed to provide strategic insights into what people across the city want and what they expect from the city council.
- Used to shape the council's vision, performance framework, delivery plan and operations - to put 'residents and customers at the heart of everything it does'.

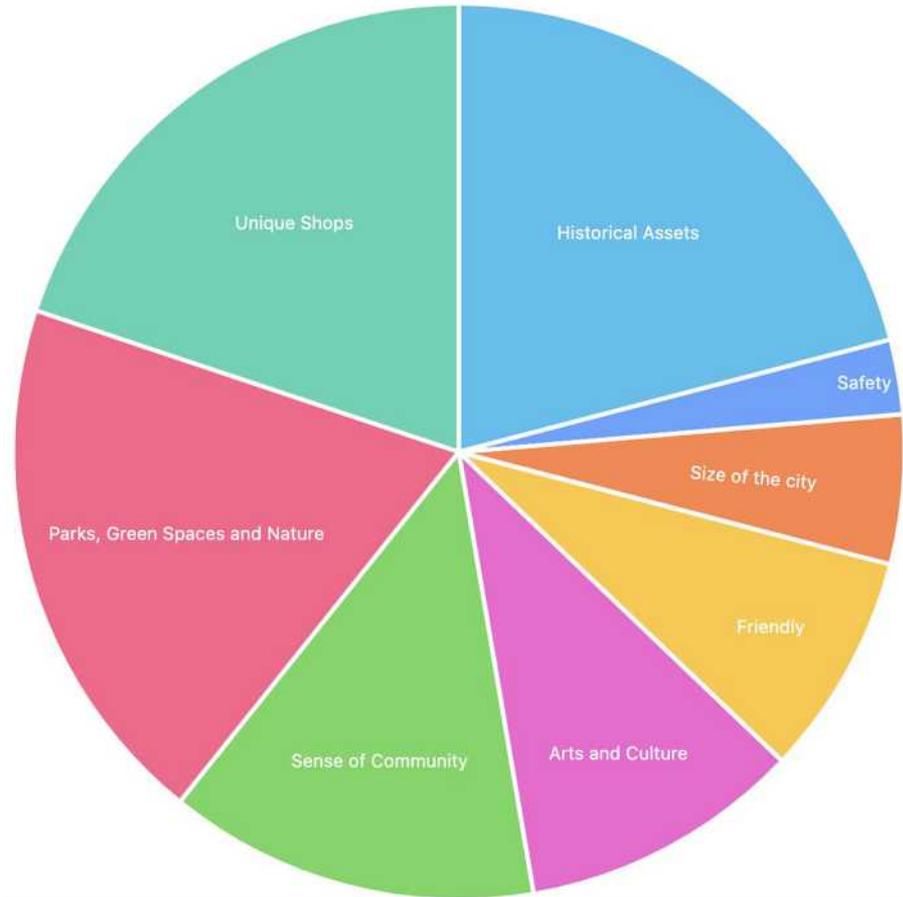
How

900+ people and organisations contributed their views through engagement activities including:

- Stakeholder interviews
- Workshops
- Panel discussion
- Focus groups
- Street outreach
- Online surveys
- Data from previous consultations, reports etc

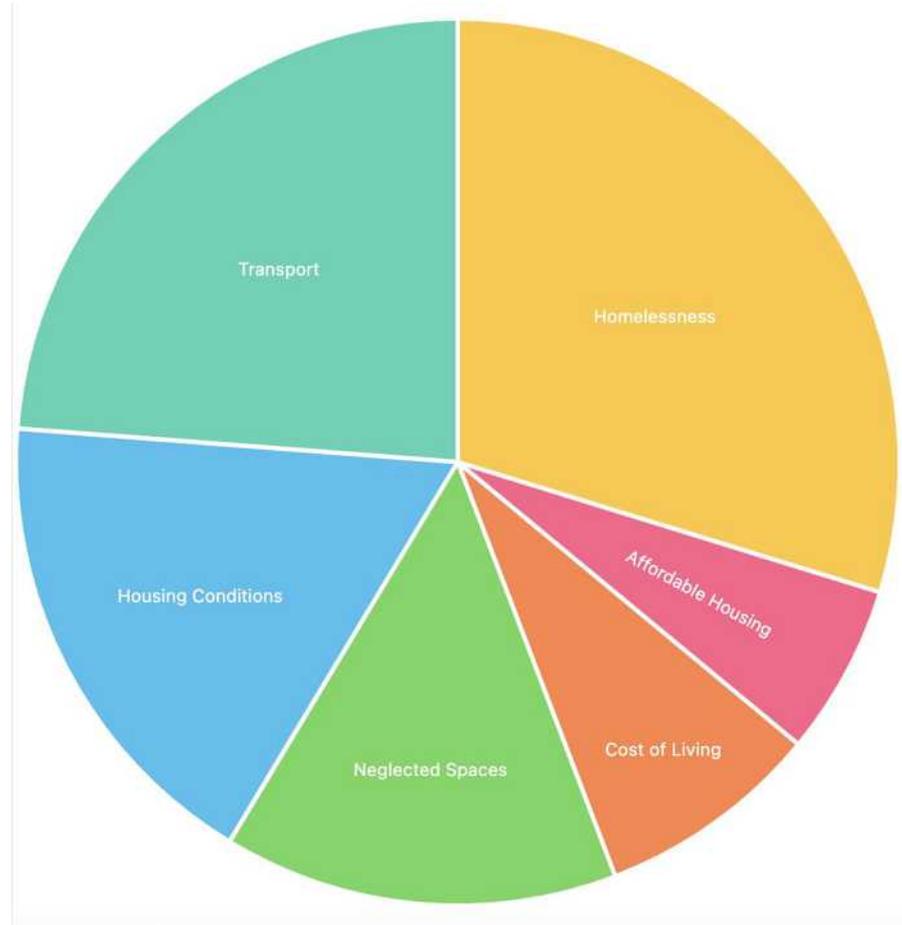
What do you like most about our city?

Responses from the public survey



What do you think the main challenges facing the city are?

Responses from the public survey



Norwich is a good place to live and raise a family, with plenty of activities and access to the coast and green spaces.

People want **action on inequalities**

- City has a mix of prosperity and entrenched poverty, with some families stuck in a generational cycle of poor education and low income, insecure work or unemployment. High housing costs and low rates of pay make it an expensive place to live; increasing numbers of people in deep poverty rely on food banks and benefits, feel unseen and unsupported; disproportionate impact of COVID and cost of living crisis on some.
- High levels of debt, disproportionately affecting those with disabilities and long-term health conditions; long waiting lists for mental health support - calls for council support for mental health for young people to reduce impact on employability and life chances; disadvantaged young people struggle to access opportunities, stigmatised as 'lacking aspiration'.
- Need holistic, collaborative approach to address social deprivation - maximise benefits income and reduce debt through advice and guidance; focus on Reducing Inequality Target Areas (RITAs) and social mobility; build on social prescribing model etc.

Norwich is a good place to work, with higher wages than in surrounding areas. Lifestyle helps attract and retain talent. Universities provide the city with research and data, attract new people and help build a youthful, skilled workforce

People want [action on jobs and the economy](#)

- Concern that gig economy is increasing low paid, insecure jobs while the Living Wage Campaign has stalled; calls to make low wage employment safer and more secure, high wage employment accessible for women and other underrepresented groups.
- People want a more joined up approach to helping young people develop the right skills for the high skilled, well paid jobs of the future; and to creating employment opportunities that help retain graduates.
- Norwich seen as geographically isolated, making it hard to attract investment. Needs better transport infrastructure to attract big business. Potential for a high quality, high capacity venue for conferences and concerts, and 5 star accommodation to attract longer, higher value visits.
- Focus on attracting investment, supporting businesses, creating employment opportunities; create an ambitious, aspirational “story of Norwich” as a destination for tourism and innovation to attract investment, new businesses and talent, and funding.

Norwich is welcoming, friendly, neighbourly and inclusive and generally feels like a safe place to be. Quirkiness and individuality give it a distinctive personality.

People want **action on safety, inclusion and accessibility**

- Although for many Norwich is a safe and welcoming city, some people sense the city is not keeping up with increasing diversity, with some Black people feeling less welcome and included, experiencing racism in schools and feeling unsafe on public transport. Concerns about rising violence, anti-social behaviour, drug use and dark streets at night. We heard of incidents of hate crime against disabled, gay and homeless people in Norwich.
- Lack of accessibility infrastructure - disabled parking, ramps into buildings, safe crossings. Concern over drive for online services - for some people (and some issues) not a viable option. Prefer choice of online, telephone and face-to face contact. A dedicated inclusion team needed to ensure clarity over responsibilities, consistent contacts and in-house expertise.
- Celebrate increased ethnic and racial diversity along with LGBTQ identity; take stronger action on race hate crime and race discrimination. Better consideration of disabled people in housing, transport, job support and access to the built environment.

Norwich is compact, walkable and beautiful with unique shopping options, historic buildings and institutions and a thriving arts and culture scene.

People want **action on the built environment & redevelopment**

- City centre seen as in decline, with shops closing, litter, more rough sleepers and a fear of crime; clashes between pedestrians, e-bikes and scooters and badly thought out street furniture. Many want empty retail space to be repurposed to address the lack of housing and/or for community spaces. Concern about threats to the natural environment from pollution, flytipping, and traffic.
- Concerns about potential redevelopment plans. People want a range of new housing, not just luxury homes, but fear low quality, “identikit” estates, and also high density, overly tall developments. Also fear of gentrification pricing people out and replacing valued community shops/resources.
- Multiple, strong calls for improved transport: unreliable, expensive buses, congestion, road works, safe cycle infrastructure, walkability.
- Calls to protect heritage, parks, rivers and green spaces and to prioritise cultural leadership, equitable funding opportunities, and strategic connections with arts and cultural institutions.

Housing is more affordable in Norwich than London and other cities. Social housing and the role the council plays as a landlord is valued.

People want **action on housing**

- General lack of suitable, affordable housing and temporary accommodation. Large social housing stock viewed positively but significant concerns around allocations, empty properties and maintenance - difficulty in contacting the council; some estates suffer neglected public space e.g. lack of play-space, rundown stairwells, fly tipping and overgrown verges, hedges and communal land.
- Residents outside the centre feel cut off from attractions and opportunities on offer; poor public transport is a barrier to access.
- Private rented sector intensely competitive, high rents and often poor quality accommodation offered by neglectful landlords; disabled people at disproportionate risk of homelessness; lack of adapted housing; concerns over impact of student accommodation on housing supply, and of transient tenants on community cohesion.
- Ensure all housing within the city is safe, liveable and energy efficient, improving living conditions and cost of living through retrofit, better maintenance and licensing of private landlords.

Community and faith organisations offer spaces and support for the most vulnerable and create volunteering opportunities.

People want **more collaboration with communities**

- Large and thriving third sector but many struggling to find volunteers and enough resources to keep the doors open, alongside rising demand from people with multiple and complex needs, including mental health issues and homelessness; want consistent, strategic engagement with the council and ability to share data and insights to support decision-making.
- People recognise the council is stretched and are willing to step up and do their bit. They want the council to facilitate this through grants, encouragement, access to council buildings and permission for people to solve problems and take care of their local area; empower local communities, unlock support at the hyper-local level; build and develop greater community cohesion through asset based community development.
- Overcome consultation fatigue by building long term relationships with communities, actively seeking to better understand their needs, involving residents in decision-making processes, and developing co-production approach to service design.

Norwich is collaborative place, where people are good at getting things done together; the size of city helps people build relationships across sectors.

People want more collaboration across the city & county

- Despite past positive collaboration some in the business community feel that with changes in senior leadership, the Council has become more inward-looking, engagement has been more piecemeal and some goodwill has been lost. City Vision 2040 Partnership provides an established platform for collaboration on which to build, and shows a strong appetite among partners to work together for the benefit of all, with an opportunity for greater and more equitable involvement of the VCSE.
- Opportunities: further develop operational integration between Council, health, and VCSE partners; grow the creative and cultural offer, strengthening collaboration between the Council and the arts and cultural sector to develop a more strategic approach.
- Strong request for improved collaboration between City Council and County Council, especially on issues beyond direct control.
- Council should use convening power to support connection and collaboration across the whole place.

Thank you

Collaborate is an innovative social consultancy building the thinking, culture and practice of collaboration to help us meet the challenges of the twenty-first century together. For more information about this report please contact jenni@collaboratecic.com.

Committee name: Cabinet

Committee date: 06/03/2024

Report title: Adoption of Greater Norwich Local Plan

Portfolio: Councillor Stonard, Leader of the council

Report from: Executive director of development and city services

Wards: All wards

OPEN PUBLIC ITEM

KEY DECISION

Purpose

To consider the outcome of the examination into the Greater Norwich Local Plan (GNLP) and to recommend adoption of the plan.

Recommendation:

To recommend that Council:

- 1) notes the inspectors' report ([in annex 1](#)) and the required main modifications in appendices 1 to 5 (available from [this link](#));
- 2) adopts the modified GNLP (documents J2.1 to J2.11 inclusive available from [this link](#)); and
- 3) delegate authority to the Executive Director, Development and City Services to publish the Adoption Statement and accompanying documents, making the GNLP part of the Adopted Local Plan for Norwich.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.

- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report's content addresses the following corporate aims of: Norwich is a sustainable and healthy city; and Norwich having the infrastructure and housing it needs to be a successful city.

This report also addresses the refine and deliver the strategic framework for city development priority in the Corporate Plan

This report helps to meet the following objective of the COVID-19 Recovery Plan:
Item 5: Housing, regeneration and development:

- Make progress on the Greater Norwich Local Plan to put in place a framework to guide development in the city and encourage it to be well designed and genuinely sustainable.
- Make the most of its own land holdings and financial capability to maximise rates of housing delivery through exemplary homes that meet the needs of the people of Norwich and develop a pipeline of sites that can be delivered over the medium to long-term.

Report details

Introduction

1. The report by independent Inspectors Mike Worden BA (Hons) Dip TP MRTPI and Thomas Hatfield BA (Hons) MA MRTPI into the soundness and legal compliance of the Greater Norwich Local Plan (GNLP) has been received. In line with the requirements of the Regulation 25 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), a publication notice and the Inspectors' Report were published on the GNLP and the partners' websites on 20 February 2024. Interested parties were also notified of the publication of the report.
2. The Inspectors conclude that, subject to the inclusion of the main modifications they recommend being incorporated into the plan, the GNLP is sound and can be adopted as part of the local plans for Broadland, Norwich, and South Norfolk.
3. This report provides a summary of the development and content of the GNLP and of the Inspectors' examination conclusions. It proposes that, subject to Cabinet's recommendations, the GNLP recommends that the councils resolve to adopt the GNLP.
4. [Annex 1](#) contains the Inspectors' Report along with the schedule of main modifications required to make the plan sound.
5. The GNLP, including the main and additional (minor) modifications, is available for information from [here](#).
6. If the councils resolve to adopt the GNLP, Adoption Statements will be placed on each of the three council's websites in line with Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
7. The Sustainability Appraisal of the plan is available [here](#). To meet the requirements of Regulation 16 of the SEA Regulations, an Environmental Adoption Statement will also be published.
8. The Sustainable Development Panel considered the adoption of the GNLP at their meeting on 27 February 2024. Their recommendations will be reported verbally to cabinet.

Background

9. Greater Norwich has an excellent record of partnership working. We were one of the first partnerships nationally to adopt a joint local plan, the Joint Core Strategy, in 2011 (only 16 areas have adopted joint plans in England).
10. Since 2013, we have taken a successful and unique approach by pooling Community Infrastructure Levy (CIL) income from developers to help to pay for

the infrastructure improvements we need. We have also worked with all the Norfolk planning authorities and with infrastructure providers and environmental bodies to plan together for our strategic needs across the county and with Suffolk. As a result, growth has been well-planned, with new infrastructure delivered to support it, whilst at the same time protecting and enhancing our special environment.

11. Local plans set the development framework for an area, usually for the next 15 years. To do this, they:

- Contain planning policies which are the basis for deciding whether to approve planning applications.
- Allocate sites for development, including homes and employment sites, which respond to evidenced local needs and opportunities.
- Ensure that buildings and places are sustainable, beautiful and of a high quality.
- Facilitate the delivery of local infrastructure, such as new schools, health and community facilities, transport, and green infrastructure such as parks, street trees, local wildlife areas and woodlands.
- Protect and enhance the natural, built and historic environment.
- Respond to climate change and support nature recovery.

12. National policy requires local planning authorities (LPAs) to have local plans which reflect recent changes to the National Planning Policy Framework (NPPF) submitted by the end of June 2025 and adopted by December 2026. Government evidence on local plan progress shows that it takes 7 years, on average, to produce a local plan and that approximately 35% of LPAs have adopted a local plan in the last 5 years.

The GNLP and other local plan documents

13. On adoption, the GNLP will supersede the current Joint Core Strategy (JCS) and the site allocations plans in each of the three districts. It consists of the strategy for growth, the site allocations to implement that strategy and a monitoring framework. Resulting changes to the adopted Policies Map are available [here](#).

14. Allocations will be made in a separate plan in the smaller villages in South Norfolk through the South Norfolk Village Clusters Housing Allocations Local Plan. The Diss, Scole and Burston area allocates sites through their Neighbourhood Plan.

15. As well as making new site allocations, the great majority of the undeveloped sites in the site allocation plans adopted around a decade ago are re-allocated through the GNLP.

16. The GNLP will not replace existing adopted Area Action Plans (AAPs) for Long Stratton, Wymondham and the Growth Triangle (NEGT), though in some cases additional allocations are made through the GNLP in these areas. The GNLP will be used in conjunction with the adopted AAPs, development management (DM) plans for the three districts and Neighbourhood Plans.

The GNLP Strategy

17. The growth strategy in the GNLP builds on and further develops the strategic approach taken in Greater Norwich in recent years and has been developed through detailed community and stakeholder consultation. Its development has taken account of a broad range of issues and views. It is well-evidenced, meets the plan's objectives and has now been endorsed by the government appointed inspectors through its examination.

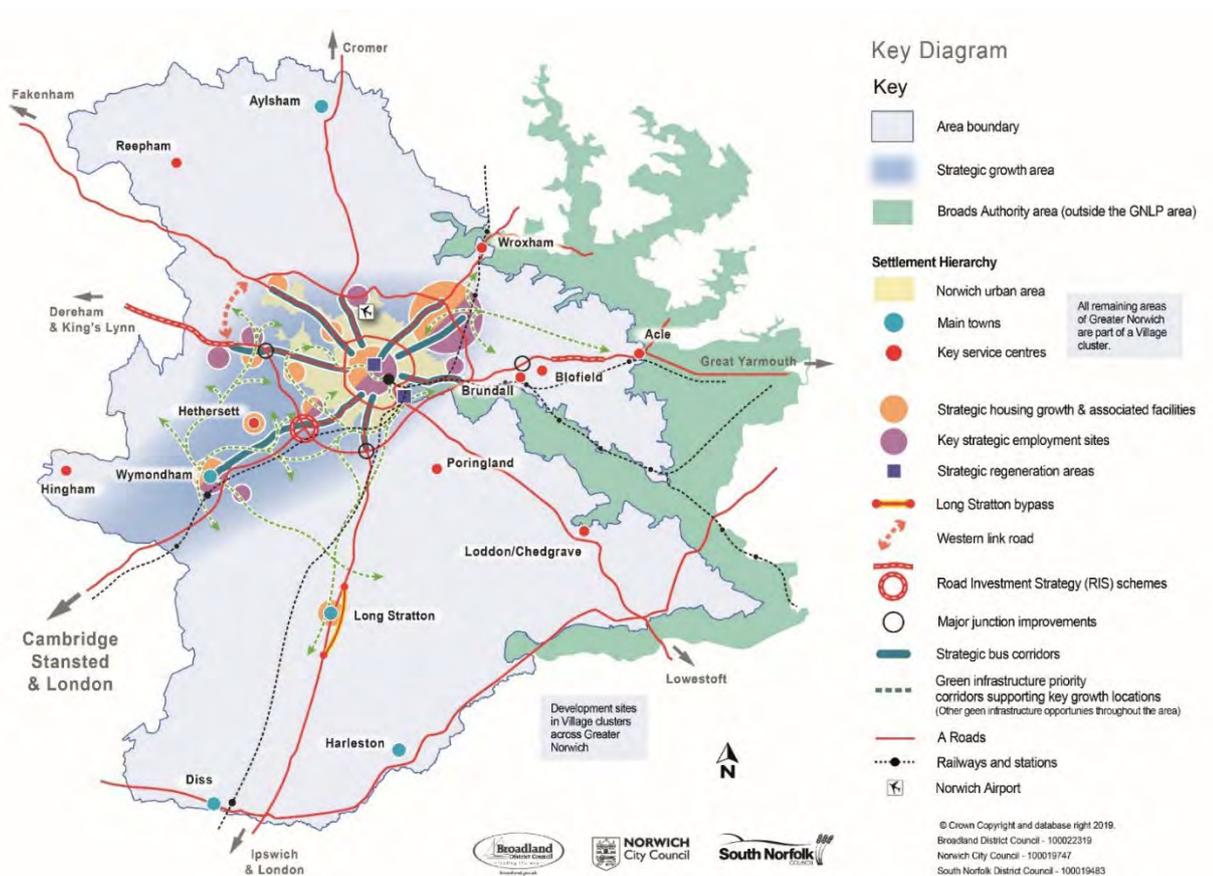
18. The GNLP provides for up to 45,500 new homes, a jobs target of 33,000 jobs and 360 hectares of employment land from 2018 to 2038. It will ensure that Greater Norwich's housing and jobs needs will be fully met in a sustainable manner, supporting the growth of the post carbon economy, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.

19. This will be achieved through the strategy focussing the great majority of growth in and around the Norwich urban area and the fringe parishes, the towns and the larger villages, together with some growth in smaller villages to support local services as follows:

- 62% of the new homes will be in the Norwich urban area and the fringe parishes. These homes will be provided firstly through infill and regeneration sites (including East Norwich and Anglia Square which are identified as strategic regeneration areas) to maximise brownfield capacity. Despite recent events concerning Weston Homes, it is important that the Anglia Square allocation remains in the plan to assist in bringing the site forward for development. Secondly, urban extensions will play a significant role in delivering development. The largest urban extension is the Growth Triangle to the north-east of the city in Broadland, providing just over 10,000 homes to 2038, as well as jobs and infrastructure (including a secondary school). This now includes a new strategic allocation at White House Farm, Sprowston. Extensions to the north-west of the city at Taverham (a new strategic allocation), to its west at Easton, Costessey and Three Score and south-west at Cringleford provide other strategic housing growth locations.
- 15% of the new homes will be in the main towns. There are new sites in Aylsham, Diss (partly through its Neighbourhood Plan), Harleston and Wymondham, with no additional sites in Long Stratton.
- 8% of the homes will be in the key service centres (new sites are allocated in Acle, Blofield, Hingham and Loddon).
- 9% of the homes will be in the village clusters covering the remaining rural areas of Broadland and South Norfolk. These sites will provide growth to meet local needs and support local services.
- 6% of the homes will be provided by windfall development.

20. The strategy includes 360 hectares of employment land at strategic sites (at Norwich City Centre, the Norwich Airport area, Browick Interchange Wymondham, Longwater, Rackheath, Broadland Business Park, Broadland Gate, Norwich Research Park, Hethel and the Food Enterprise Park at Easton/Honingham). Allocations will also provide smaller sites with local job opportunities.
21. The strategy includes a strategic growth area promoting Greater Norwich's economic strengths and sectors and linking via the Cambridge Norwich Tech Corridor to other regional and national growth corridors centred on Cambridge. The increased focus on the strategic growth area defined in the GNLP assists consideration of future strategic approaches, potentially including a new settlement or settlements.
22. This approach will both assist the ability to access external funding and emphasise the role that Norwich, in particular the city centre as a regional centre for jobs, retailing, leisure, entertainment and cultural activities, and the Norwich Research Park (NRP) for employment, play as a driver of the regional economy, generating travel and contributing to the economy. This strong focus on the strategic growth area will assist strong economic growth in the area. It will also provide for the co-location of jobs and homes, providing strong links to services, education opportunities and other facilities, at the same time promoting active and sustainable travel.
23. The strategy also promotes the protection and enhancement of the built and natural environment and local landscapes. This is done through the further development of the green infrastructure network and the retained strategic focus on continued protection of river valleys and strategic gaps.
24. The GNLP promotes a pro-active approach to housing delivery through only allocating housing sites where a reasonable prospect of delivery has been evidenced. The plan also provides choice and flexibility by ensuring there are enough committed sites to accommodate 11% more homes than "need", should they be required to offset any non-delivery. Additional opportunities will be provided through windfall development.
25. As such, the proposed strategy offers the opportunity to strengthen Greater Norwich's role as a key part of the national economy. Economic growth in Greater Norwich is set to be in key sectors that will assist in the national and international adaptation to a post carbon economy, including in plant sciences and high value engineering.
26. Taken together, these measures will ensure that housing needs to 2038 will be fully met in sustainable manner, supporting the growth of the post carbon economy in Greater Norwich and more widely, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.

27. The GNLN Strategy is summarised in the plan's Key Diagram below.



Key points on GNLN content for Norwich

28. GNLN Policy 1 provides the overall growth strategy for the area and Policy 7.1 the strategic policy for Norwich and its fringe areas in Broadland and South Norfolk. These are supported by site specific allocations.

29. As set out above, Norwich and its fringe will be the area's main focus for jobs, homes and service development to enhance its regional centre role and to promote major regeneration, the growth of strategic and smaller scale extensions (mainly outside the Norwich City Council area) and redevelopment to support neighbourhood renewal.

30. The Norwich City Council area will provide around a quarter (around 10,725) of the new homes for Greater Norwich between 2018 and 2038. The plan allocates two Strategic Regeneration Areas (SRAs) at East Norwich and the North City Centre (focussed on Anglia Square), the remainder of the strategic urban extension at Three Score, 16 sites for mixed use development including housing and 16 sites for housing development (see annex 2 for the Norwich site allocations). This approach maximises brownfield capacity in the city.

31. Employment growth is mainly focussed on strategic employment sites which are all in the strategic growth area. This includes sites in the Cambridge Norwich Tech Corridor (e. g. the Norwich Research Park which includes UEA). Norwich city centre will provide for expansion of office, digital and creative industries and leisure uses on several mixed-use sites. Norwich Airport will provide for aviation related and wider employment uses. There are expanded employment opportunities and expanded employment sites in smaller industrial areas such as Hurricane Way. The plan's employment strategy will place the focus on low carbon, high growth economic sectors including health research, agri-food, high value engineering and ICT/digital. Growth of these sectors will help Greater Norwich to play a key role nationally and internationally in assisting the transformation to a post carbon economy.
32. Norwich city centre's strategic role as the key driver for the Greater Norwich economy will be strengthened. Development in the city centre will provide a high density mix of employment, housing, leisure and other uses. Intensification of uses will be supported within the city centre to strengthen its role as a main regional employment, retail, cultural and visitor centre, providing a vibrant and diverse experience for all.
33. The plan has a major focus on regeneration. It provides for high density development of around 3,000 homes and 4,100 jobs to 2038 at the sustainable mixed-use quarter, the East Norwich SRA. Development will be guided through a masterplan covering a broad range of issues including transport and community infrastructure, local retailing, and sustainable energy supplies. The plan also provides for over 1,600 homes in the Northern City Centre, along with a new Large District Centre at Anglia Square. In addition, the plan includes brownfield development sites elsewhere in the city centre. Smaller brownfield sites will support neighbourhood-based renewal, with densities highest in the most accessible locations. The site allocations within Norwich are listed in annex 2 of this report.
34. Development at the UEA will cater for up to 5,000 additional students by 2038 through intensification of uses within the campus and its limited expansion.
35. Enhancements to the green infrastructure network will include links to and within the Wensum and Yare Valleys, the Marriott's Way and Mousehold Heath to provide links within the city and out to the open countryside, along with local networks. The critical environmental issues related to nutrient neutrality and visitor pressure on internationally protected habitats will also be addressed by the plan.
36. The plan sets the affordable housing requirement at 33% for the majority of Greater Norwich and 28% in the city centre due to higher development costs. The policy allows for flexibility over this requirement where a viability assessment can show that there are exceptional site-specific circumstances. The affordable

housing should generally be provided on-site and there is also flexibility over tenure - current evidence shows a higher social rented requirement in the city.

37. Work on design codes will be progressed separately by Norwich to Broadland and South Norfolk. Work is ongoing on a guidance note on Purpose Built Student Accommodation (PBSA) to support policy 5 on homes, on a Supplementary Planning Document (SPD) on Biodiversity Net Gain to support policy 3 and on the East Norwich Masterplan SPD to support policy 7.1 and the site allocations at East Norwich.

GNLP Plan making Stages

38. The publication of the Inspectors' report is the end of the GNLP's examination. The independent planning inspectors, who are appointed by the Planning Inspectorate on behalf of the Secretary of State, have assessed the soundness of the submitted plan through its examination.

39. Plans are 'sound' if they are:

- Positively prepared – i.e. it provides a strategy which, as a minimum, meets the area's objectively assessed needs and is informed by agreements with other authorities;
- Justified – it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – it is deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters as evidenced by a statement of common ground;
- Consistent with national policy – it enables the delivery of sustainable development in accordance with national policies.

40. In line with regulatory requirements, the following stages have been undertaken in producing the GNLP:

Stage		Dates
Call for Sites		May to July 2016
Regulation 18 Preparation Stage		
Stage A	Growth Options and Site Proposals consultation	January to March 2018
Stage B	New, Revised and Small Sites consultation	October to December 2018
Stage C	Draft Plan Consultation	January – March 2020
Regulation 19 Publication Stage		
Pre-submission Draft Plan for representations on soundness and legal compliance		February – March 2021
Submission and Examination Hearings		
Submission to the Secretary of State		July 2021
Public Examination Hearings		February 2022 – July 2023

Examination Hearings

41. The hearings were divided into 5 sections:

- Parts 1 and 2 in February and March 2022 covered the strategy and site allocations.
- Part 3 in July 2022 was on the East Norwich Strategic Regeneration Area.
- Part 4 in March 2023 was on Nutrient Neutrality and Housing (specifically the trajectory for the delivery of homes).
- Part 5 in July 2023 was on Gypsy and Traveller needs and site allocations.

Inspectors' Letter

42. A letter from the Inspectors was received on 9 August 2023. It is available on the [GNLP website](#). It showed that the Inspectors were generally content with the plan, but that a number of policies, largely relating to site allocations and housing delivery, would require main modifications to the 2021 submitted version of the plan which was the subject of the examination.

Main and Additional Modifications

43. Almost all local plans require main modifications to be made to them.

44. The main modifications were subject to consultation between 25 October and 6 December 2023. Consultation feedback was received from 67 respondents who made 257 individual representations. Many of the responses did not raise soundness issues and some comments only focussed to a limited extent on the main modifications, instead returning to issues already addressed through the examination, such as objecting to specific site allocations or requesting the inclusion of sites not allocated in the plan.

45. The Inspectors took note of the partnership's view on the consultation comments, along with the other comments made, in concluding on the modifications that are needed to make the plan sound. In this light, the Inspectors have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. Where the Inspectors feel it is appropriate, their report references their response to specific soundness issues raised.

46. Additional modifications, mainly to supporting text rather than policies, have also been made. These are largely updates and clarifications which do not relate to the soundness of the plan. They do not form part of the inspectors' examination of the plan and were available for reference rather than being part of the main modifications' consultation. They include:

- Factual updates to supporting text, especially in the spatial profile e.g. new census data.
- References to changes in national policy e.g. the Levelling Up and Regeneration Act (LURA) and nutrient neutrality requirements.

- Progress on infrastructure schemes.
- National targets for reduction in greenhouse gas emissions.
- Removal of footnotes and replacement with references in text where required.

47. Further factual updates have been made to the additional modifications to reflect the final outcome of the plan's examination and the passage of time.

48. Taking account of the examination hearings and the consultation feedback, the modifications to the plan which they have concluded are necessary to make the GNLFP sound have been included in the Inspectors' Report.

The Inspectors' Report

49. The inspectors' report concludes that with the specific main modifications, the plan satisfies legal requirements and meets the criteria for soundness in the NPPF. However, the councils can only adopt the plan if they incorporate the modifications that the inspectors view as necessary to make the plan sound. Consequently, the councils must now consider whether or not to adopt the plan in the light of the inspectors' report and recommendations.

50. The inspectors' report in [annex 1](#) begins with a Non-Technical Summary, an Introduction and a section providing the context for the plan. The Non-Technical summary of the main modifications requires:

- Amending Policies 2 and 3 for clarity, consistency with national planning policy, to reflect updated evidence, and in light of Natural England advice on nutrient neutrality mitigation;
- Amending Policy 7.5 so that it relates solely to self/custom build housing;
- Deleting Policy 7.6 for new settlements, with text in the plan pointing to a review of the Local Plan assessing options for longer term growth which may include the potential for a sustainable new settlement or settlements;
- Deleting the Costessey Contingency Site allocation;
- Deleting those site allocations which are not justified;
- Amending site allocation policies to remove ambiguity and clarify development requirements;
- Allocating sites for Gypsy and Traveller needs;
- Updating the housing supply figures and housing trajectory to reflect the evidence. The conclusion to the Inspectors' Report confirms that a five-year housing land supply for the Plan area has been demonstrated and this supply will not need to be updated annually;
- Replacing the monitoring framework;

- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

51. The report then addresses legal compliance concluding that the plan meets all legal requirements. Specifically, the report states that:

- The Inspectors have had due regard to the Equalities Act through the examination, including their consideration of the allocation of Gypsy and Traveller sites to meet identified need, and policies relating to accessible and adaptable housing.
- The Partnership has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.
- The Sustainability Appraisal has adequately considered reasonable alternatives and is suitably comprehensive and legally compliant.
- The legal requirement to undertake an appropriate assessment in accordance with the Habitats Regulations has been met. This work focuses on the impacts of the plan on internationally protected habitats. Policy requirements to protect those habitats in relation to visitor pressure and nutrient neutrality are included in policy 3 of the plan.
- Public consultation requirements for the plan were addressed in line with our Statements of Community Involvement and Local Development Schemes and meet the requirements of the national Regulations.
- The plan meets legal requirements in respect of preparing policies to address climate change.

Soundness

52. The Inspectors identified nine main “soundness” issues which were investigated through the examination and conclude that if the modifications they recommend are made:

- The Plan’s overall spatial strategy is based on robust evidence and is justified and effective. They consider that the spatial distribution across the Plan area is logical, it has been selected following consideration of reasonable alternatives and is an appropriate strategy as required by the NPPF.
- The housing requirement of 40,541 homes for the Plan period, based on the standard methodology using 2014 based projections, is justified and consistent with national policy. Also, the Plan’s jobs target of 33,000 jobs, and the allocation of around 360 hectares of employment land, are sound.
- The strategy for the economy and areas of growth is justified, effective and consistent with the evidence. This includes the approach taken on village clusters and a modified approach to small-scale windfall housing in policy 7.5 to place its focus on self and custom build housing. The Inspectors also conclude that a review of the Local Plan will need to assess options for longer

term growth which may include the potential for a sustainable new settlement or settlements.

- The Plan policies relating to Sustainable Communities (policy 2 covering various aspects of design, including accessibility, density, designing out crime, water efficiency, and energy consumption) and Environment Protection and Enhancement (policy 3 covering the built, historic and natural environment, and modified to cover nutrient neutrality) are justified, effective and consistent with national policy.
- With a modification to clarify that strategic infrastructure schemes in policy 4 being progressed by other bodies including Norfolk County Council and National Highways, such as the Norwich Western Link, are not required to deliver any allocation, the Plan accords with the evidence and is justified and effective.
- The Plan's approach to the provision of affordable housing, Gypsy, Traveller and Travelling Showpeople accommodation, self and custom build housing, and the housing needs of other groups, is justified, effective and consistent with national policy.
- The Partnership's approach to site assessment and selection for both general housing and Gypsy and Traveller accommodation is appropriate and is justified. Thus, the vast majority of the proposed site allocations in the submitted plan are retained. Paragraphs 53 to 55 below identify the limited number of submitted sites which are not included in the plan for adoption and those sites for which site capacity and delivery assumptions have been changed. The housing trajectory, now in Appendix 4 of the GNLP, has been amended to reflect these changes.
- The plan provides a 5-year supply of 12,632 homes for the Greater Norwich area, which is a supply of 5.77 years. It also demonstrates a 5-year supply of Gypsy and Traveller pitches.
- The revised Monitoring Framework, which now includes targets, triggers, and actions and is in a separate third document of the plan, provides a sound and effective basis for monitoring the Plan.

53. The following sites have been removed from the plan as the result of the examination:

- i. South of Le Neve Road, Marsham GNLP2143 for 35 homes due to impacts on the neighbouring church.
- ii. Mill Road Reedham GNLP3003 for 30 homes due to poor access.

- iii. The contingency site at Costessey.
- iv. Other housing sites removed by landowners:
 - Ber Street (CC2), Norwich for 20 homes.
 - Lower Clarence Road (CC13), Norwich for 45 homes
 - Ipswich Road Community Hub (R2), Norwich for 15 homes
 - Land north of Springfield Way and west of Dereham Road, Hingham for 20 homes.

54. With regard to the larger sites with planning permission, and those allocated in Area Action Plans, the Inspectors have made some alterations to the supply and delivery assumptions. There has been a loss of 250 dwellings at the Norwich RFU site as there was no evidence to support relocation plans during plan period, along with a loss of 180 dwellings at North Rackheath as some of the homes in the AAP are no longer considered likely to be delivered by 2038.

55. In addition, site capacity and delivery assumptions have been changed from the submitted plan on some sites. This includes East Norwich (3,000 homes are now assumed to be delivered in the plan period) and White House Farm, Sprowston, where there has been a loss of 660 dwellings from the delivery trajectory to 2038.

56. The Inspectors' overall conclusion is that with inclusion of their recommended main modifications the plan is sound and *"the LPAs will be able to confirm that a five-year housing land supply for the Plan area has been demonstrated in a recently adopted plan"*. This is an excellent outcome as due to recent changes to the NPPF, this 5-year supply will be fixed for 5 years on adoption of the plan.

Securing Plan Adoption

57. The publication of the Inspectors' report enables the councils to proceed to adoption of the GNLP. It requires the main modifications to be included in the adopted plan to make it sound. As stated above, these changes are binding - a plan can only be adopted with their inclusion.

58. The decision to adopt the plan must be made by each of the three councils. Full Council meetings are scheduled in each authority in March 2024. Adoption of the GNLP involves the publication of an adoption statement shortly after each authority adopts the plan. This is accompanied by the GNLP as amended by the inspectors' modifications, the inspectors' report, the sustainability appraisal, and the habitats regulation assessment. These are available from [here](#). An Environmental adoption statement will also be available.

59. Legal challenges can be made within 6 weeks of the adoption of a local plan. An application to the High Court can be made either on the grounds that the document is not within the appropriate power of the LPA, or that a procedural requirement has not been complied with.
60. Once the risk of legal challenge has passed, the production of the final online and hard copy documents to publication standard can be undertaken.

Conclusions

61. Overall, the Inspectors' report is very positive, and the successful development of an updated joint strategy is a considerable success.
62. Adoption of the GNLP will allow us to implement evidence-based policies for our area through a plan which the partnership has invested considerable time and money in. While it has been a long process to get the GNLP to adoption, national data shows that the seven years taken is the average under the current local plans system.
63. The GNLP builds on our extensive experience of joint working to identify where growth and new infrastructure is needed from 2018 to 2038. Plan adoption will keep us at the forefront of joint planning nationally which will help us to attract investment into the area, including Government funding, especially for infrastructure and regeneration programmes. Only one other partnership, Central Lincolnshire, has adopted a review of a joint plan.
64. The plan will deliver high-quality homes, along with a broad range of new jobs and supporting infrastructure, including green infrastructure, roads, schools, health care facilities and broadband connectivity. The plan includes a range of policies which will ensure that the development is in the best locations to support our existing communities and to create thriving new communities, as well as making sure that development is well-designed, and is sustainable.
65. The councils' strategy for the distribution of the majority of growth in the strategic growth area focussed on the Norwich Urban Area and the Cambridge Norwich Tech Corridor, with some growth also focussed at other levels of the hierarchy to support thriving communities and the retention of services, has been fully endorsed. This further develops the long-term strategic approach set through the JCS. It also allows for a future focussing of growth on new settlements if this is the path which the authorities choose to take in their next plan or plans.
66. Adoption of this coherent strategic plan will mean that Greater Norwich will have an up-to-date local plan with a clear and sustainable policies and site allocations that will promote environmental protection, investment in our economy and the provision of the homes, jobs and infrastructure we need, including through the continued use of pooled CIL monies.

67. Importantly, recent revisions to the NPPF mean that for 5 years after adoption of the plan, there will be no need to annually demonstrate a five-year land supply for Greater Norwich. This will significantly reduce the pressure to grant permissions for non-allocated housing sites that currently exists as there is not, at this point, a 5-year land supply. This further increases the benefits of having an adopted plan.

68. There could potentially be some very serious negative impacts associated with not adopting the plan. Firstly, the uncertainty created by not having an adopted strategy and not having a 5-year land supply would increase the prospect of speculative or inappropriate proposals being submitted, resulting in “planning by appeal”. Secondly, there is a very real threat of Government intervention for those LPAs which are not making sufficient progress on their plans to have an adopted plan in place by December 2026. Ten local planning authorities had the Secretary of State intervene in their local plan process in the last three months of 2023. Seven were required to update their Local Development Schemes to make clear when their plans are to be adopted, whilst three (Spelthorne BC, Erewash BC and West Berkshire Council) were instructed not to withdraw their draft plans from examination. It seems highly likely that there would be Government intervention if one or more of the Greater Norwich authorities were not to adopt the GNLP. Thirdly, given the amount of consultation the plan has gone through and the successful outcome of its examination, it is also possible that there could be a legal challenge to and significant resulting costs from non-adoption of the GNLP.

69. Having received a highly positive Inspectors’ Report endorsing the strategy and site allocations set out in our plan, and taking account of the significant benefits of adoption and the major difficulties that would be created through not following that path, the case for adoption is overwhelming.

Consultation

70. As set out in paragraph 39 above and in detail in the GNLP’s Statement of Consultation (available from section A8 of the GNLP core submission documents [here](#)), there has been extensive consultation on this plan.

Implications

Financial and resources

71. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council’s stated priorities, as set out in its Corporate Plan 2022-26 and budget. The costs of adopting and publishing the GNLP are covered within existing budgets.

72. Progressing the GNLP through its examination is being met within the existing resources of the GNLP team and the annual budget committed to it by each of

the partner authorities. Should the GNLP not be able to progress to adoption then it is likely that significant costs would be borne by the Council.

Legal

73. The preparation and content of a local plan needs to accord with a range of legal and regulatory provisions. Project assurance, including taking relevant legal advice, has been undertaken as part of the plan-making and examination process.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	The plan encourages growth of vibrant and healthy communities with good access to jobs, services and facilities, helping to reduce disparities between the life chances of disadvantaged and other communities. New communities will be well-integrated with existing communities and will be safe and attractive places to live. An Equality Impact Assessment has assessed the impact of the local plan on the community and its potential to address socio-economic inequality.
Health, social and economic impact	Adoption of the GNLP will assist in addressing health, social and economic considerations as it supports sustainable housing and jobs growth and will support the delivery of infrastructure, including health care facilities.
Crime and disorder	This report has implications for the council's crime and disorder considerations in that new development is required to reflect best practice to deter crime through its design and layout. In addition, the supporting text in the plan advises planning applicants to contact Norfolk Constabulary for guidance on crime and safety issues.
Children and adults safeguarding	This report does not have any direct implications for the council's Safeguarding Policy statement.

Consideration	Details of any implications and proposed measures to address:
Environmental impact	<p>A Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), and a Habitat Regulations Assessment support the GNLP. The SA has explicitly considered the policies and sites allocated through the plan. The HRA has focused on nutrient neutrality and visitor pressure on internationally protected habitats.</p> <p>The GNLP's Climate Change statement sets out how the plan seizes the opportunities available locally to promote low carbon development and address climate change. This includes the location of development and its design, with policies reducing the need to travel, promoting water efficiency, sustainable energy provision and recycling, and requiring development to be adapted to the address the impacts of climate change, including flood risk. The plan has a particular focus on ensuring that new development provides biodiversity net gain and new green infrastructure (GI) as part of a wider GI network.</p>

Risk management

Risk	Consequence	Controls required
Since the plan has successfully been through examination and has been found to be sound subject to including the Inspectors' main modifications, risks relate to non-adoption of the plan	Non-adoption of the plan would lead to more speculative development in unplanned locations, potential government intervention in plan-making and would be likely to reduce both government and private investment in the area.	Such risks will be addressed by adoption of the plan.

Other options considered

74. All local planning authorities are required to produce a Local Plan. As there are clear benefits to working together with our neighbours in Broadland and South Norfolk to produce a joint plan, and the case for adoption is concluded in this report to be overwhelming, there are no realistic options to adoption of the GNLP.

Reasons for the decision/recommendation

75. The benefits of adopting the plan are set out in the conclusions section of the report above. Adoption of this coherent strategic plan will mean that Norwich and Greater Norwich will have an up-to-date local plan with a clear and sustainable policies and site allocations that will promote environmental protection, investment in our economy and the provision of the homes, jobs and infrastructure we need, including through the continued use of pooled CIL monies.

Background papers: None

Appendices:

Annex 1: Inspectors' Report

Annex 2 – Site Allocations in Norwich

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Report to Broadland District Council, Norwich City Council and South Norfolk Council

by Mike Worden BA (Hons) Dip TP MRTPI and Thomas Hatfield BA (Hons) MA MRTPI

Inspectors appointed by the Secretary of State

Date: 19 February 2024

Report on the Examination of the Greater Norwich Local Plan

The Plan was submitted for examination on 30 July 2021

The examination hearings were held:

1-10 February 2022, 1-10 March 2022, 6 July 2022, 22-23 March 2023, 25 July 2023.

File Ref: PINS/G2625/429/9

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Abbreviations used in this report

dpa	Dwellings per annum
dph	Dwellings per hectare
ENSRA	East Norwich Strategic Regeneration Area
Framework	National Planning Policy Framework
GIRAMS	Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy
GTAA	Gypsy and Traveller Accommodation Assessment
GTAAP	Growth Triangle Area Action Plan
Ha	Hectares
HELAA	Housing and Economic Land Availability Assessment
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
JCS	Joint Core Strategy
MM	Main modification
NSPF	Norfolk Strategic Planning Framework
Partnership	Greater Norwich Development Partnership
PPG	Planning Policy Guidance
PPTS	Planning Policy for Traveller Sites
SNVCHAP	South Norfolk Village Clusters Housing Allocations Plan
SA	Sustainability appraisal
SoCG	Statement of common ground
UEA	University of East Anglia

Non-Technical Summary

This report concludes that the Greater Norwich Local Plan ('the Plan') provides an appropriate basis for the planning of the 3 Council areas, provided that a number of main modifications [MMs] are made to it. Broadland District Council, Norwich City Council and South Norfolk Council working together as the Greater Norwich Development Partnership, have specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearings, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MMs were subject to public consultation over a six-week period. In some cases, we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the Sustainability Appraisal and Habitats Regulations Assessment and all the representations made in response to consultation on them.

The main modifications can be summarised as follows:

- Amending Policies 2 and 3 for clarity, consistency with national planning policy, to reflect updated evidence, and in light of Natural England advice on nutrient neutrality mitigation;
- Amending Policy 7.5 so that it relates solely to self/custom build housing;
- Deleting Policy 7.6 for new settlements;
- Deleting the Costessey Contingency Site Allocation;
- Deleting those site allocations which are not justified;
- Amending site allocation policies to remove ambiguity and clarify development requirements;
- Allocating sites for Gypsy and Traveller needs;
- Updating the housing supply figures and housing trajectory to reflect the evidence;
- Replacing the monitoring framework;
- A number of other modifications to ensure that the Plan is positively prepared, justified, effective and consistent with national policy.

Introduction

1. This report contains our assessment of the Greater Norwich Local Plan in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2023 (paragraph 35) (the Framework) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Greater Norwich Local Plan, submitted in July 2021 is the basis for our examination. It is the same document as was published for consultation in February 2021.
3. A revised Framework was published on 19 December 2023. It makes it clear that, under transitional arrangements, plans reaching Regulation 19 stage before March 2024 should be examined under the previous version of the Framework (dated September 2023). The examination of this Plan has therefore taken place under that version. References to the Framework in this report are to the previous September 2023 version, unless otherwise stated.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Councils requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. Our report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
5. Following the examination hearings, the Partnership prepared a schedule of proposed MMs and, where necessary, carried out sustainability appraisal and habitats regulations assessment of them. The MM schedule was subject to public consultation for six weeks.
6. We have taken account of the consultation responses in coming to our conclusions in this report, and in this light, we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal/habitats regulations assessment that has been undertaken. Where necessary we have highlighted these amendments in the report.

Policies Map

7. The Councils must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, it is a requirement to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Submission Policies Map Broadland, Submission Policies Map Norwich, Submission Policies Map South Norfolk as set out in the Greater Norwich Local Plan Pre-Submission Draft Strategy and Draft Sites Plan.
8. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. In addition, there are some instances where the geographic illustration of policies on the submission policies map is not justified and changes to the policies map are needed to ensure that the relevant policies are effective.
9. These further changes to the policies map were published for consultation alongside the MMs on the Greater Norwich Local Plan in October 2023.
10. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Partnership will need to update the adopted policies map to include all the changes proposed in the Plan and the further changes published alongside the MMs.

Context of the Plan

11. The Plan has been produced jointly by Broadland District Council, Norwich City Council and South Norfolk Council working together as the Greater Norwich Development Partnership. This is a formal partnership arrangement overseen by a Board comprised of representatives from the three Councils plus Norfolk County Council and the Broads Authority.
12. The Plan will replace the Joint Core Strategy for Broadland, Norwich and South Norfolk ('JCS') and the Site Allocations Plans/DPDs for each of the three districts. Allocations in the smaller villages in South Norfolk which will be covered by the South Norfolk Village Clusters Housing Allocations Plan ('SNVCHAP') when it is adopted. It is expected to be submitted for examination in 2024. The now made Diss, Scole and Burston Neighbourhood Plan also allocates sites for development.

13. The following plans are to be carried forward and used in conjunction with the Greater Norwich Local Plan; the Old Catton, Sprowston, Rackheath and Thorpe St Andrew Growth Triangle Area Action Plan (2016); the Long Stratton Area Action Plan (2016); the Wymondham Area Action Plan (2015); the Broadland Development Management Policies Document (2015); the Norwich Development Management Policies Document (2014); and the South Norfolk Development Management Policies Document (2015).
14. The Plan area has a population of around 409,000 just over half of whom live in the Norwich urban area. Norwich is the regional capital, an economic hub and an historic city. The Plan area extends to cover the many market towns, villages and hamlets in this part of the County along with many rich natural and historic assets. The Broads National Park lies immediately to the east of the Plan area.

Public Sector Equality Duty

15. We have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included our consideration of several matters during the examination such as the allocation of Gypsy and Traveller sites to meet identified need, and policies relating to accessible and adaptable housing.

Assessment of Duty to Co-operate

16. Section 20(5)(c) of the 2004 Act requires that we consider whether the Councils have complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
17. The Plan has been prepared by the three authorities working together as part of the Greater Norwich Development Partnership within the provisions set out in the Norfolk Strategic Planning Framework ('NSPF'). Evidence has been produced jointly across the three districts and wider areas, building on previous joint working as part of preparing the JCS. As a joint plan there has clearly been effective joint working between the three local planning authorities together with the other GNLP Board member authorities of Norfolk County Council and the Broads Authority.
18. The Partnership has submitted evidence, including numerous statements of common ground with prescribed authorities. Strategic matters have been identified and the Duty to Co-operate Statement of Compliance sets out how these have been consulted on and worked on together with prescribed bodies and other authorities, agencies and organisations across Norfolk and Suffolk. These relate to housing, economy, infrastructure (education, transport, and utilities) health, natural environment, historic environment, and climate change/energy efficiency.

19. We are satisfied that where necessary the Partnership has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Other Aspects of Legal Compliance

Sustainability Appraisal

20. A Sustainability Appraisal ('SA') report of the Regulation 19 version of the Plan was published in January 2021, and was the culmination of work undertaken since 2017. Three further SA Addendum reports were published in September 2021, December 2021 and June 2022. The first of these was published in response to a representation made at Regulation 19 stage and re-assessed the original seven spatial options in light of the increased housing requirement. The second addendum was undertaken at our request and modelled both smaller and minimal housing supply buffers as 'reasonable alternatives'. The third SA addendum updated some factual information and also addressed omissions that had been identified. The SA was also updated to assess the MMs. This final iteration of the SA identifies that the MMs to Policy 2 and Policy 7.5 would lead to minor negative effects for SA objectives compared to the submission version of the Plan. Regarding Policy 2 this relates to the deletion of wording we considered to be ineffective, which has led to a minor change to 1 SA objective. In terms of Policy 7.5 it relates to an assumption that the modifications to this policy will lead to a greater loss of greenfield land than the submission version of the policy. However, we consider that to be unlikely given that the policy now relates solely to self and custom build housing. The assumed supply contribution from this policy also remains unaltered at 800 dwellings over the Plan period. Moreover, the SA does not consider these potential adverse effects to be significant. Other strategy policies either score the same or slightly better against the SA objectives than in the submission version of the Plan.
21. Throughout the production of these documents a consistent framework has been used to assess the emerging plan. This framework was developed following a scoping and consultation exercise and is relevant and appropriate to the scope of the plan, local context and national policy. Assessment of the Plan against this framework was undertaken, and we are satisfied that the overall approach is acceptable.
22. The SA has assessed a range of housing and growth options. Six options for distributing growth were assessed in the SA at Regulation 18a stage, and a preferred option incorporating elements of each of these was devised at Regulation 18c stage. The total quantum of development envisaged when the six original options were assessed was very similar to at Regulation 19 stage, with a total housing provision of 48,465 dwellings. Whilst the net growth envisaged was lower (7,200 dwellings compared to 10,704 at Regulation 19 stage), and the Plan period was slightly different (2015-2036 compared to 2018-

36), those differences do not invalidate the original assessment in our view. In this regard, the SA is a high level document that seeks to assess the broad implications of different spatial distributions of development. In any case, the addendum published in September 2021 provided a summary of the performance of each of the original 6 options, as well as the preferred option, which illustrates how these options perform. It was unnecessary for this work to identify potential alternative sites given the high level nature of the SA.

23. It is argued that other spatial options scored better, or should have scored better, than the preferred option selected by the Partnership. However, the purpose of the SA is to inform the preparation of the Plan, and each SA objective could be given different weight in different circumstances. Whilst the scoring assigned to some of the options has been questioned, the judgements that have been made are within the bounds of reasonableness in our view.
24. A second SA addendum was undertaken at our request and modelled both 10% and 1% buffers to the Local Plan housing supply. The purpose of this exercise was to inform both the discussions at the hearings, and our deliberations in relation to the strategy. Following the hearings and the publication of our initial findings, this buffer has reduced to 11%, and the SA addendum has assisted in assessing the implications of this. Once again, given the high level nature of the SA, it was unnecessary for the addendum to have identified which sites would be removed from the Plan were a lower buffer to have been adopted at Regulation 19 stage.
25. It is also asserted that the site assessment process underpinning the Regulation 18c version of the Plan did not take the findings of the 2020 SA into account. However, even if that were the case, this was an early version of the Plan that preceded the submitted Regulation 19 version. Final decisions about the composition of the Plan had not been made at that stage, and the Regulation 18c plan is not the version which is the subject of this examination. In this regard, the Regulation 19 version of the Plan was clearly informed by the 2021 SA. Whilst many of the “preferred sites” identified in the Regulation 18c version were subsequently carried forward into the Regulation 19 Plan, that is unsurprising given that they are amongst the most sustainable alternatives, as has been confirmed in various iterations of the SA and in other work. Moreover, the SA is not intended to be the sole mechanism by which proposed allocations are selected, and the Partnership were entitled to use the approach set out in the site assessment booklets for that purpose.
26. The assessment of potential housing sites with regard to climate change impacts assumed that increases in emissions would be directly linked to the new population arising from the development. In this regard, a development leading to an increase in carbon emissions across the Plan area of between 0.1% and 1% was assumed to have a negative effect, whereas more than a 1% increase was assumed to have a major negative effect. Whilst this approach

was criticised in some representations, it reflects that larger developments will generally be associated with higher emissions. The locational accessibility of individual sites, which has implications for emissions arising from private cars, is also assessed under SA Objective 12 – Transport and Access to Services.

27. It is argued that the SA should have benchmarked reasonable alternatives against the national target of achieving net zero carbon emissions by 2050. However, that is not a requirement of the Framework or the Planning and Compulsory Purchase Act 2004 and achieving this target will depend on a range of factors, most of which are beyond the scope of the planning system. The testing of climate change impacts within the SA has been undertaken on a consistent and reasonable basis and is adequate in our view.
28. The assessments of potential site allocations within the SA were largely based on secondary data sources, and each site was assessed using a consistent methodology. Technical reports and other evidence submitted by representors were not taken into account in the SA, as these were not available for every site, and so would have led to inconsistencies had they been considered. This approach is appropriate in our view. Whilst the site assessment booklets took a different approach to the assessment of certain matters (such as landscape) that is unsurprising given the high level, desktop nature of the SA assessment. In this regard, the site assessment booklets also considered other sources of information, including Officer assessments based on site visits. There was no legal failure in utilising this approach.
29. Appendix E of the January 2021 SA sets out a 'post-mitigation assessment' which considers how mitigating factors could help to avoid or reduce any site impacts identified at the pre-mitigation stage. This assessment incorporates the impact of Plan policies, including the site-specific policies which are set out for allocations in part 2 of the Plan. Whilst it is argued that this approach is inconsistent, as it affords the benefit of the site-specific policies to proposed allocations, that is in the context of the need to assess the Plan that has been submitted. There is no legal flaw in this regard.
30. Overall, we consider that the SA has adequately considered reasonable alternatives and is suitably comprehensive and legally compliant.

Habitats Regulations Assessment

31. A Habitats Regulations Assessment ('HRA') of the Regulation 19 version of the Plan was published in July 2021, and followed HRAs of earlier versions of the Plan. Having undertaken an appropriate assessment, it concluded that subject to the adoption of the Green Infrastructure and Recreational Impact Avoidance Mitigation Strategy ('GIRAMS'), and the monitoring of progress towards water recycling improvements, there would be no adverse effects to the integrity of

any European site. The GIRAMS strategy has subsequently been implemented by Local Planning Authorities throughout Norfolk, including the Partner Authorities, and is supported by Natural England. The Greater Norwich Water Cycle Study was also subsequently finalised in March 2021.

32. An updated HRA was published in March 2023, which assessed a proposed modification to Policy 2 regarding Nutrient Neutrality. This found that subject to the adoption of this modification, there would be no adverse affect upon the integrity of any European site. A HRA addendum was also published in May 2023, which assessed the proposed Gypsy and Traveller allocations. A further HRA addendum was undertaken in relation to the MMs, which also found that there would be no adverse affect upon the integrity of any European site.
33. Focussing on the legal requirement at this stage, the HRA reports conclude, overall, that the Plan provides a sufficient policy framework to ensure that there will be no adverse effects on the integrity of European protected sites, either alone or in-combination with other plans or projects. We are therefore satisfied that the legal requirement to undertake an appropriate assessment in accordance with the Habitats Regulations has been met.

Other

34. The Plan has been prepared in accordance with the Local Development Scheme ('LDS') for Norwich City [A17], South Norfolk [A16] and Broadland [A15]. Each LDS was updated in January 2023 to reflect the most recent timetable for the examination and adoption of the Plan.
35. The Partnership has confirmed that the Plan will supersede the policies in four existing development plan documents. In accordance with Regulation 8(5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 these are set out in Appendix 3 of the Plan, along with a list of development plan documents which will remain, and which will be used alongside the Plan for decision making purposes.
36. Consultation on the Plan and the MMs was carried out in compliance with the respective Statements of Community Involvement [A18.1 A18.2, A19, A20.1 and A20.2]. These included temporary arrangements in response to Covid 19 guidance. The preparation of the Plan also met the minimum consultation requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.
37. A number of site allocations were either introduced or significantly expanded (in terms of site area / capacity) between Regulation 18c stage and the submitted version of the Plan. However, there was an opportunity to comment on these at Regulation 19 stage. In this regard, it is not uncommon for sites to be added,

removed, or adjusted between Regulation 18 and Regulation 19 versions of a local plan. This approach does not raise any legal or soundness concerns.

38. The Development Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
39. Several Plan policies will help to ensure that the development and use of land contribute to the mitigation of, and adaptation to, climate change. In addition, the spatial focus of the Plan on developing sites within the Norwich urban area and in the main towns and centres, is intended to reduce the need to travel. In particular the allocation of the large site at East Norwich provides an opportunity for a major new housing and business quarter for the city well linked to public transport and the city centre. The Plan includes a specific statement on Climate Change setting out how the Plan relates to measures identified in Royal Town Planning Institute and Town and Country Planning Association practice guidance. Whilst this is not statutory, it does help to show how addressing climate change runs through key elements of the Plan.
40. The Plan does not address wider climate change issues that are outside the scope of the planning system. Representations made at the examination argue that the Plan does not go far enough in terms of dealing with issues such as carbon emissions and developing a net zero strategy approach. However, we consider that the Development Plan, taken as a whole, accords with the statutory objective set out in Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 and with the provisions of the Framework in respect of preparing policies to address climate change.
41. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Assessment of Soundness

Main Issues

42. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified nine main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion, or allocation in the Plan.

Issue 1 – Is the Plan’s overall spatial strategy based on robust evidence and is it justified and effective?

The Plan Period

43. The Plan covers the period 2018 to 2038. It was submitted for examination in July 2021. It is likely that adoption will take place in March 2024. This delay was largely due to the extension of the examination period as a result of further work and consultation undertaken by the Partnership on potential Gypsy and Traveller site allocations. Therefore, on adoption, the Plan period will be marginally less than the minimum 15 years which the Framework expects strategic policies to cover. However, extending the Plan for an additional year would involve a re-assessment of the housing requirement and site delivery evidence which would prolong adoption even further. In the circumstances and recognising that the Plan will need to be reviewed within 5 years, and that the provisions in the Framework are non-statutory, we consider that the Plan period to 2038 is sound and no modification is therefore necessary.

The Vision for Greater Norwich 2038

44. The plan sets out a Vision for Greater Norwich in 2038. It promotes growth making the best of Greater Norwich’s distinct built, natural and historic assets. It sets out the vision in relation to the economy, communities, homes, environment and delivery, and accords with the evidence. It is a soundly based vision and one from which the Plan objectives and policies flow.
45. The Plan sets out six objectives which together with the vision provide the context for the policies.

Strategic Policies

46. The Plan is divided into two separate documents relating to the Strategy and the Sites. All of the policies in the Strategy document are strategic. These are necessary to address the strategic priorities of the area and this approach accords with the Framework. There are a number of strategic site allocations in the sites part of the Plan. **MM21** brings these sites together within the Plan so that it has a logical structure which is effective.

The Growth Strategy

47. The housing requirement of 40,541 for the Plan period has been identified based on the standard method using 2014-based household projections. This figure forms the housing requirement set out in Policy 1. The supporting text to the Plan sets out that this is a housing target. However, to be effective, the

wording within the supporting text needs to make it clear that this is a requirement. **MM1** and **MM3** address this.

48. The Growth Strategy accords with the vision of focusing development within Norwich and the Cambridge-Norwich Tech Corridor. The distribution of growth broadly follows the settlement hierarchy of the Norwich urban area and the fringe, main towns, key service centres and village clusters. It seeks to promote the regional function of the City and to maximise opportunities for brownfield and accessible greenfield development. It follows a logical hierarchy with the City of Norwich at the top, then the main towns of the Plan area, then the key service centres which serve their rural hinterlands and then the village clusters. It accords with the vision in this Plan and builds on strategic approaches already set out and being implemented through the JCS. It has been arrived at through consultation and consideration on six broad spatial options including concentration and dispersal.
49. Not all the main towns are proposed to have similar levels of growth, and even within the Cambridge-Norwich Tech Corridor there are variations in approach. Nevertheless, the strategy is based on firm evidence including topic papers and site assessment appraisals for each main town. Some settlements have more constraints than others. In some settlements, there is a significant pool of extant planning permissions which has been a factor in decisions around the need and scope for new allocations. Hence not every town has the same amount of growth to be met through allocations in this Plan.
50. We consider that the general approach to the spatial distribution across the Plan area is logical, and supported by the evidence and is justified. It has been selected following consideration of reasonable alternatives. It is an appropriate strategy as required by the Framework.
51. In order to meet the need for around 40,541 homes the Plan allocates new sites, re-allocates some sites allocated in existing plans, and relies on delivery from sites with planning permission, windfalls, and smaller sites which may come forward in accordance with policies in this Plan.
52. Tables 6 and 7 of Policy 1 need modifying for effectiveness to refer to the Plan requirement and to make consequential changes to a number of figures and descriptions which are to be modified as set out elsewhere in this report. **MM2** and **MM5** address these matters.
53. The Housing Growth Locations map sets out the main areas of housing growth. This map needs to be updated for effectiveness to reflect the changed numbers for each area as a consequence of other policy changes and delivery assumptions set out in the Plan. **MM6** makes this change.

54. We have found that the housing supply is lower than the 49,492 set out in the submitted version of the Plan. This is explained in the appropriate sections of the report, but it is primarily due to revisions to site delivery assumptions. The vast majority of the site allocations in the Plan are sound, but the evidence before us indicates that for many sites a later start date should be assumed, or a lower annual delivery rate, or both.
55. We therefore consider that the provision in the Plan would be around 45,041 homes for the period 2018 to 2038. This represents a supply buffer of around 11% above the housing requirement figure. Whilst this is below that set out in the submitted Plan, we consider it to be an appropriate supply buffer for the reasons set out under Issue 8 of this report.
56. The modifications necessary to make Policy 1 sound are set out in **MM7**.

Conclusion

57. Subject to the MMs identified above, the Plan's overall spatial strategy is based on robust evidence and is justified and effective.

Issue 2 – Have the identified housing and employment needs and requirements been positively prepared and are they justified and consistent with national policy?

Housing Need and Requirement

58. The Plan identifies a housing need figure of 40,541 based upon the standard methodology using 2014 based projections. This follows the approach set out in the Planning Policy Guidance ('PPG'). Based upon the evidence before us, we do not consider that there are exceptional circumstances to depart from using the standard method for this Plan.
59. The standard method is the minimum starting point for assessing local housing need. However, based on the evidence before us and having regard to the factors set out in the PPG, we do not consider that there needs to be an uplift to this figure. We consider that whilst the Partnership has growth ambitions such as set out in the City Deal, these do not justify an uplift. For example, the housing growth element of the City Deal refers to the housing sites within the North East Norwich Growth Triangle, sites which are already committed or set out in this Plan or other adopted Area Action Plans.
60. The Plan identifies a significant supply buffer over and above the housing requirement. It states that this higher supply is to assist with the growth ambitions of the Norwich area and to recognise higher rates in the 2018 based

projections. The Partnership has effectively made provision for an oversupply against the requirement given these factors.

61. For these reasons we consider that the housing requirement of 40,541 homes for the Plan period is justified and consistent with national policy.

Employment Need and Requirement

62. The Plan proposes to allocate around 360 hectares of employment land to aid the delivery of 33,000 additional jobs and to support key economic sectors over the Plan period. The figure of 33,000 jobs was originally based on the 2017 Greater Norwich: Employment Land Assessment, which used figures derived from the East of England Forecasting Model. Subsequent modelling undertaken in the Employment Land Assessment Addendum (2020) largely supports this figure, including when factoring in an uplift for higher growth in certain sectors. Whilst this uplift was relatively modest (at around 500 jobs) it uses an approach that we consider to be robust.
63. Reference is also made in the representations to an East of England Forecasting Model run that was published in August 2020, which projected a broadly similar level of jobs growth (around 29,700 jobs). However, this is based on data from 2018 and 2019 and so did not consider the impact of Covid 19. Whilst there is a different profile of jobs growth between these forecasts, that is to be expected given that they were derived from separate models using data from different years. In this regard, the 2020 East of England Forecasting Model run does not call into question the jobs target in the Plan in our view.
64. Our attention has been drawn to the fact that the local economy has grown significantly since 2011, adding around 29,000 jobs since then. However, that reflects in part a bounce back from the 2007-2008 financial crisis and subsequent recession. In this regard, the Partnership stated in the hearings that a return to the 2006 jobs level was only achieved between 2016-18 in the Plan area. Moreover, whilst jobs growth between 2015 and 2018 was higher at around 5,000 per annum, that represents a relatively brief snapshot that is not comparable to the longer-term analysis that has informed the jobs requirement.
65. The proposed 360 hectares of employment land represents a significant over-allocation of land to meet the requirement for 33,000 jobs. However, this headline figure includes a number of sites which are already partially built out. Moreover, this amount of land is justified in our view to provide choice, allow for churn and windfall losses to other uses, and to facilitate the growth of certain sectors. It would also help to support a higher rate of growth should this transpire. Each of the proposed allocations, the majority of which are carried forward from previous plans, have also been assessed for their ongoing suitability for allocation in the 2017 Employment Land Assessment.

66. The Plan has identified a significant range of employment sites, of various sizes and locations, to support the Plan's jobs target. Where a specific company's site and locational requirements necessitate the identification of an alternative site, that is a matter for the development management process.
67. For the above reasons, we consider the Plan jobs target of 33,000 jobs, and the allocation of around 360 hectares of employment land, to be sound.

Conclusion

68. Subject to the modifications set out above, the Plan identifies housing and employment needs and requirements that are justified, have been positively prepared and accord with national policy.

Issue 3 – Is the strategy for the economy and areas of growth justified, effective and consistent with the evidence?

69. The strategy for the economy and areas of growth flows from the spatial strategy set out in Policy 1 of the Plan. Its detail in relation to specific areas is set out in Policies 7.1-7.4 which then relate to the individual site allocations set out later in the Plan. Policy 6 also deals with the overall approach to the economy and town centres. This general approach is justified and effective.

Policy 6 - The Economy

70. This policy aims to support economic growth in the Plan area and sets out the overall approach to employment development, tourism, leisure and cultural industries, and town centres. Modifications to the policy wording are necessary to provide appropriate support for the development of rural enterprises in line with national planning policy. Modifications to the 'Town Centres' section of the policy are also necessary for consistency with national policy, to control the proliferation of town centre uses in out-of-centre and edge-of-centre locations, and to delete an unjustified requirement that prevented the loss of commercial premises. Finally, changes to the 'Local Retail and Leisure' section of the policy are necessary for clarity and effectiveness. **MM12** makes these changes.

Policy 7.1 - The Norwich Urban Area including the Fringe Parishes

71. This policy sets out the spatial framework for the Norwich Urban Area and the fringe parishes. It flows from the settlement hierarchy set out in Policy 1.
72. The focus on Norwich and the fringe parishes for jobs, homes and service development accords with the evidence and the spatial strategy. It enhances Norwich's role as the regional centre and aims to promote major regeneration, strategic and smaller scale extensions and neighbourhood renewal. The policy

seeks to focus development in the city centre, at the strategic regeneration site at East Norwich, along with strategic urban extensions. The approach is therefore one of promoting development in the centre of the city but complementing it by the ENSRA and new and rolled forward allocations on the fringes of the urban area, most of which are greenfield. This distribution helps to avoid any over concentration of housing in the city centre and provides choice in the housing market. This approach is justified based on the evidence.

73. A number of modifications to the policy are required as a result of changes made elsewhere in the Plan. For example, the numbers referred to in the housing table need to be modified as a result of changes to site allocations, expected capacities, and likely delivery timescales, which are referenced elsewhere in this report. A further modification is needed to the 'Economy' section to clarify where and under what circumstances the loss of existing office floor space will be resisted in Norwich city centre. In this regard, an Article 4 Direction came into effect in February 2023 that withdraws permitted rights from certain office buildings to change use to residential. Listed buildings do not benefit from this permitted right and so are not subject to the Article 4 Direction. Accordingly, the policy wording also seeks to restrict changes of use of listed office buildings that are of importance to the city centre economy.
74. Further changes to the 'Retail and Main Town Centre Uses' section of the Policy are necessary to clarify that it applies to the primary and secondary retail areas and large district centres within Norwich city centre, which will be the focus of any additional retail growth. These changes are necessary to accord with the sequential approach set out in the Framework.
75. In respect of the 'Leisure, Culture and Entertainment and the Visitor Economy' section of the policy, modifications are necessary to delete the restriction of such uses to the defined City Centre Leisure Area only, as this is inconsistent with the Framework. Further modifications to this section are necessary for reasons of effectiveness and to clarify the circumstances where leisure use proposals will be acceptable.
76. A section of the policy is concerned with the ENSRA site, which is subject to a separate site-specific policy in the Plan. Therefore, to be effective, Policy 7.1 needs to be modified such that it relates to key principles only and not to repeat the detail set out in the site-specific policy. Reference to the Costessey Contingency Site also needs to be removed as a consequential change to the separate modification to delete Policy GNLP0581/2043.
77. In light of representations to the main modification consultation, a reference to green infrastructure strategy updates within the final sentence of each of the Policies 7.1-7.4 is necessary for effectiveness and to remove any ambiguity.

None of the additional changes suggested in the MM consultation are necessary for soundness.

78. **MM13** addresses the above points and is necessary for the reasons set out.

Policy 7.2 - The Main Towns

79. Policy 7.2 sets out the overarching approach to the Main Towns of Aylsham, Diss, Harleston, Long Stratton, and Wymondham. Consequential modifications to the housing table in the policy are necessary as a result of changes to site allocations and expected capacities. In addition, modifications to the policy wording are necessary to clarify that rural exception sites for affordable housing will be permitted on land adjacent or well related to the settlement boundary of the Main Towns (previously this was unclear). **MM14** makes these changes.

Policy 7.3 - The Key Service Centres

80. Policy 7.3 sets out the overarching approach to the Key Service Centres of Acle, Blofield, Brundall, Hethersett, Hingham, Loddon/Chedgrave, Poringland/Framingham Earl, Reepham and Wroxham. Consequential modifications to the housing table in the policy are necessary as a result of changes to site allocations and expected capacities. In addition, modifications to the policy wording are necessary to clarify that rural exception sites for affordable housing will be permitted on land adjacent or well related to the settlement boundary of the Key Service Centres (previously this was unclear). **MM15** makes these changes.

Policy 7.4 - Village Clusters

81. Policy 7.4 sets out the overall approach to the Village Clusters, which include a significant number of smaller settlements in the Plan area. Consequential modifications to the policy are necessary as a result of changes to site allocations and expected capacities. In addition, modifications to the policy wording are necessary to provide clarity regarding the proposed supply, and to remove the word "infill" which is unnecessary in relation to sites that are within existing settlement boundaries. **MM16** makes these changes.

Policy 7.5 - Small Scale Windfall Housing Development

82. As submitted, Policy 7.5 would allow for small scale residential development adjacent to any development boundary or "*within or adjacent to a recognisable group of dwellings*". This would apply across the Plan area, although cumulative development permitted under the policy would be capped at 3 dwellings in smaller parishes and at 5 dwellings in larger parishes. There are a number of problems with this approach. In particular, it would permit new housing development in remote locations including adjacent to "*recognisable groups of*

*dwelling*s” that do not constitute a settlement. This would be contrary to national planning policy which seeks to promote sustainable development in rural areas and to avoid the development of isolated homes in the countryside. Moreover, whilst the policy states that “*positive consideration will be given to self and custom build*”, it would equally allow for open market housing in these locations. In this regard, it is unclear that it would provide any additional incentive to deliver self and custom build housing.

83. We also have practical concerns regarding how this policy would operate. The approach of allowing for small open market housing developments in areas where housing has previously been strictly controlled is likely to attract significant interest. In this regard, it is unclear how the proposed cap could operate effectively in a situation where several applications were lodged concurrently in the same parish.
84. At the hearings, the possibility of Policy 7.5 operating as a self and custom build exception sites policy was discussed, and the Partnership subsequently indicated that it wished to pursue that approach. Such an approach would be justified given the need for self and custom build housing, which is discussed separately under Issue 6. Accordingly, **MM17** modifies Policy 7.5 to that effect, and alters the policy wording to apply solely to settlements rather than “*recognisable groups of dwellings*”. It also sets out criteria to ensure that such developments respect the form and character of the settlement and do not lead to an inappropriate cumulative level of development. Given the size threshold and policy criteria that would apply to such proposals, we do not consider that this approach would significantly affect the availability of rural exception sites for affordable housing.

Policy 7.6 - Preparing for New Settlements

85. Policy 7.6 sets out an approach to identifying one or more new settlements to be brought forward in the next local plan.
86. The Plan identifies enough sites to meet housing need to 2038 as is set out elsewhere in this report. This Plan will be subject to review in accordance with the provisions of the Framework. There is no submitted evidence that major new additional sites are required before 2038 or that new settlements should be a favoured option in any case. The supporting text to the Policy indicates that these new settlements could be delivered from 2026 which is contrary to the spatial strategy set out in the Plan.
87. The Policy is not consistent with the Sustainable Growth Strategy set out in Policy 1. It is not justified, does not accord with the submitted evidence, and provides significant uncertainty for communities. It is open to the authorities to consider options for future growth when they review the Plan but there is no

need for this Plan to refer to such options in a policy. Indeed Policy 7.6 could be prejudicial to those considerations. **MM18** therefore deletes this policy.

88. **MM4** is necessary for effectiveness in order to make changes to the supporting text of Paragraph 187 to explain that a review of the Local Plan will need to assess options for longer term growth which may include the potential for a sustainable new settlement or settlements.

Conclusion

89. Subject to the modifications set out above, the strategy for the economy and areas of growth is justified, effective and consistent with the evidence.

Issue 4 – Whether the Plan policies relating to Sustainable Communities and Environment Protection and Enhancement are justified, effective and consistent with national policy?

Policy 2 Sustainable Communities

90. Policy 2 seeks to ensure that development is of high quality design, contributes to resilient and inclusive communities, and helps to address climate change. It covers various aspects of design, including accessibility, density, designing out crime, water efficiency, and energy consumption. There is clearly a need for a policy of this sort in the Plan. However, a series of modifications are necessary to remedy ineffective wording so that it is clear how a decision maker should react to development proposals. Modifications are also necessary to remove text that does not serve a clear purpose, to avoid unnecessary duplication including with other plan policies, and to avoid conflating distinct planning issues.
91. It is necessary to modify the first paragraph to insert “where relevant” as most of the policy criteria will not be relevant to all development proposals. Part 1 of the policy is altered so that appropriate emphasis is placed on non-car modes. Changes to part 4 of the policy are necessary to clarify that minimum densities are not merely “indicative” but that they will also be subject to consideration of accessibility and local character. In addition, part 9 of the policy is modified to remove reference to the automatic adoption of any more stringent optional standards that may emerge in the future. In this regard, the content of any such standards is currently unclear, including whether any stipulations would be attached to their adoption in a local plan. Were any such standards to emerge, that would be a matter for a future review of this Plan.
92. The deletion of part 10 of the policy is necessary as these matters are now addressed in the Building Regulations, which have subsequently set higher

national minimum energy efficiency standards than are referred to in the policy. A further change to the Building Regulations is planned for 2025 which will mean that homes built to that standard will be net zero ready. A new part 10 of the policy is necessary to address energy consumption in terms of design, layout, and orientation and to provide for the use of sustainable energy, local energy networks, and battery storage where appropriate. The transfer of part iv into the explanatory text is also necessary as this section is for information only and is not intended to guide the determination of planning applications.

93. We note the request to modify Policy 2 so that it would require major developments to detail how they would fund the necessary police infrastructure. However, Policy 4 already requires that development proposals support local infrastructure capacity improvements through on-site provision, providing land and developer contributions. Accordingly, such a modification is not required for soundness. The policy wording also adequately covers measures to mitigate and adapt to climate change, and no further modifications are required in this regard. The historic environment and the setting of the Broads are both addressed in Policy 3, and it is unnecessary to duplicate that here. None of the other changes suggested in the MM consultation are necessary for soundness, with the exception of a detailed alteration to refer to protecting water quality.
94. **MM8** makes the changes referred to above.

Policy 3 Environmental Protection and Enhancement

95. Policy 3 sets out an approach that seeks to enhance the built, historic, and natural environments. In this regard, it contains criteria relating to design, designated and non-designated heritage assets, and designated and non-designated natural assets. A policy covering these matters is clearly necessary in the Plan. However, a number of modifications to the policy wording are necessary to ensure consistency with national policy and the statutory tests that relate to listed buildings, conservation areas, and those set out in the Habitats Regulations.
96. In terms of the 'Built and Historic Environment' section of the policy, several modifications are necessary in order to separate out distinct requirements and planning issues. Modifications are also necessary to include reference to conservation area appraisals and historic landscape character assessments, and to highlight the contribution that landscapes, views, and the Broads make to the historic environment. These changes are required for clarity and effectiveness.
97. With regard to the 'Natural Environment' section of the policy, a number of detailed modifications are necessary for clarity and to avoid conflating separate planning designations, including the distinct tests that apply to each. An additional bullet point is necessary to refer to the enhancement of the strategic

green infrastructure network, which was not adequately addressed in the submitted version of the policy. Modifications are also necessary to avoid lending the weight of the development plan to the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy and local green infrastructure strategies, as these are not Development Plan Documents and may be subject to revision without external scrutiny or oversight. Moreover, additional paragraphs within this section are necessary to require a project level HRA to be undertaken where there would be a likely significant effect on a European site, and to reflect the Partnership's nutrient neutrality strategy. Following the MM consultation, further detailed changes have been made for clarity and consistency with national policy.

98. A Written Ministerial Statement on Nutrient Neutrality in River Basin Catchments was issued during the examination, and Natural England wrote to a number of planning authorities to advise that as a competent authority under the Habitats Regulations, they should carefully consider the nutrient impacts of any new plans, policies and development proposals. This affects sites within the catchments of the Wensum Special Area of Conservation, the Broads Special Area of Conservation and the Broadland Ramsar, which cover most of the Plan area. The Partnership subsequently produced a Nutrient Neutrality Mitigation Strategy and a viability study addendum, and it agreed a statement of common ground with Natural England. As a result, modifications to Policy 3 were proposed that would require applicants to provide evidence, through a HRA, that relevant proposals would not adversely affect the integrity of sites in an unfavourable condition. This modification is necessary to ensure that the Plan accords with national planning policy and the Habitats Regulations.

99. **MM9** makes the above changes to Policy 3.

Conclusion

100. Subject to the abovementioned MMs, we consider that the Plan policies relating to Sustainable Communities and Environment Protection and Enhancement are justified, effective and consistent with national policy.

Issue 5 – Is the approach to Strategic Infrastructure justified and effective and does it accord with the evidence?

101. Policy 4 sets out the approach that is taken in respect of identifying and delivering strategic infrastructure improvements which are necessary to support the growth identified in the Plan. These improvements relate to transport and other strategic infrastructure including energy, health, education and utilities.

102. The Policy provides the overarching approach, with more detail set out in an appendix to the Plan. That appendix is not policy and can be updated without the need for a review of the Plan.
103. The Policy wording refers to the Transport for Norwich Strategy. This is a transportation plan led by Norfolk County Council, which covers a significant proportion of the Plan area. It sets out a number of key transport schemes and projects, some of which are necessary to support the levels and pattern of growth in the Plan.
104. To be justified and effective, the wording of Policy 4 needs to be modified to make it clear that the schemes listed within the Policy are not proposals within the Plan, but in most cases, schemes already being promoted and progressed by other bodies including Norfolk County Council and National Highways. In this sense, to be effective, these schemes should be more clearly expressed as contextual projects being undertaken by key partners rather than projects that may appear to be requirements of the Plan itself. The Norwich Western Link falls into this category, and the modified wording highlights that this is a scheme on which work is already underway. This road project is not required to deliver any allocation in the Plan but, it is appropriate for it to be referenced as a strategic infrastructure project being progressed by the Highway Authority.
105. There is also a need for the Policy to make reference to new police building infrastructure requirements within the list of strategic infrastructure categories, based on the evidence submitted.
106. In light of representations made to the MM consultation, we consider that for effectiveness and to make the policy wording unambiguous, a reference to green infrastructure strategy updates needs to be added to the paragraph of the Policy relating to the green infrastructure network.
107. **MM10** addresses these matters.

Conclusion

108. Subject to **MM10**, the approach to Strategic Infrastructure accords with the evidence and is justified and effective.

Issue 6– Whether the Plan’s approach to the provision of affordable housing, Gypsy, Traveller and Travelling Showpeople accommodation, self and custom build housing, and the housing needs of other groups, is justified, effective and consistent with national policy.

Affordable Housing

109. The evidence base underpinning the affordable housing requirements in Policy 5 is supported by the Greater Norwich Local Housing Needs Assessment 2021. The need for affordable housing across the Plan area is around 670 homes per annum which includes an allowance for stock lost through right to buy. We consider the evidence base that supports the policy requirement to be soundly based.
110. The lower policy requirement for Norwich city centre is based on the prevalence of previously developed land and the challenges in securing over 30% affordable housing on such sites. Both requirements have taken account of viability evidence.
111. We consider that the assumption that the SNVCHAP will provide 33% affordable housing to be appropriate. This is the policy requirement and there is no evidence before us which indicates that this level of provision cannot be achieved across that plan area.
112. The policy provides for circumstances where individual schemes on brownfield sites can justify a lower affordable housing delivery on the basis of a viability assessment. However, this approach is not justified since it is possible that the development of greenfield sites may also have viability issues due to possible abnormal costs and the Framework does not refer to brownfield sites only. If it can be demonstrated through a viability assessment that a site cannot provide the affordable housing required by policy, then the land status is not relevant. Therefore, an amendment to remove reference to brownfield sites is necessary.
113. The policy requires purpose-built student accommodation to provide affordable housing ordinarily on site. However, given the practicalities of securing and managing affordable housing within student housing schemes it should be modified to require a financial contribution to off-site affordable housing, for effectiveness.
114. The requirement for 10% of all affordable housing, rather than 10% of the total number of homes, to be provided as affordable home ownership is inconsistent with the Framework and therefore needs to be removed.

Gypsy, Traveller, and Travelling Showpeople Accommodation

Need and requirement

115. Following further work undertaken during the Examination, a requirement for 52 Gypsy and Traveller pitches was proposed over the Plan period to 2038. This is based on meeting the overall 'ethnic need' for pitches identified in the Greater Norwich Gypsy and Traveller Accommodation Assessment (2022) ('GTAA'), which is consistent with the most recent definition of "gypsies and travellers" in Planning Policy for Traveller Sites ('PPTS'). The GTAA is based on a thorough assessment which included a 90% survey rate of authorised pitches in the Plan area. Whilst around 10% of those surveys were undertaken via third parties, including family members, that is a relatively small proportion and there is no indication that this has undermined the results of the study. Moreover, the survey data was validated in discussion with the Norfolk and Suffolk Gypsy, Roma and Traveller Liaison Service, and by speaking to site managers. The assessment was also informed by stakeholder consultation including with the National Federation of Gypsy Liaison Groups and the Showmen's Guild of Great Britain.
116. Whilst it is argued that some Gypsy and Traveller families living in the Plan area have been omitted, no detailed evidence has been submitted in support of that contention. In this regard, a study undertaken in relation to the Kings Lynn GTAA has not been submitted to the Examination, and it is therefore unclear whether it has any implications for the Greater Norwich GTAA. An assumption has also been made about those residing in bricks and mortar accommodation who may wish to live on a Gypsy and Traveller pitch, and so the assessment is not restricted to those currently living in a caravan. Separately, whilst it is noted that caravans made up 0.45% of the total housing stock in the 2011 Census, that figure included park homes, agricultural workers accommodation, and other caravans not associated with Gypsies and Travellers. It is therefore of limited value in assessing the need for Gypsy and Traveller pitches.
117. In terms of migration assumptions, the GTAA assumes that inflows and outflows will balance out over the Plan period. However, as none of the surveyed households expressed a desire to leave the Greater Norwich area, this effectively assumes that no one will choose to in-migrate either. During the hearings, the Partnership stated that the 2021 Census indicated that in-migration rates were relatively low. The Norfolk and Suffolk Gypsy, Roma and Traveller Liaison Service representative also stated that in their experience movement in and out of Greater Norwich was limited. However, it is unlikely that there will be no in-migration into the area, as is currently assumed. The use of a criteria-based policy is therefore necessary to address such cases and to provide the requisite flexibility.

118. Overall, we consider the GTAA to be based on robust assumptions, and it forms an appropriate basis for planning for Gypsy, Traveller and Travelling Showpeople provision in the Plan area. In this regard, modifications to Policy 5 are necessary to include a requirement for both Gypsy and Traveller pitches and Travelling Showpeople plots based on the needs identified in the GTAA. This is necessary in order for the Plan to be positively prepared, justified, and consistent with national policy, as set out in PPTS.

Transit provision

119. The GTAA recommends that the Partner authorities set up a negotiated stopping places policy to address transit provision. In this regard, there is an established Norfolk and Suffolk unauthorised encampment protocol in place, which was summarised at the hearings as *“toleration if possible, eviction if necessary”*. Such an approach has been used in recent years to manage unauthorised encampments in the area, the majority of which relate to Gypsies and Travellers who are visiting or passing through. The Norfolk and Suffolk Gypsy, Roma and Traveller Liaison Service representative stated that this established approach has worked well, and that around 50% of unauthorised encampments are tolerated on this basis. In light of the evidence before us, including that given at the hearing sessions, we are satisfied that this is a sensible approach to transit provision and that the Plan is therefore sound in the absence of allocating sites for this purpose.

Site allocations

120. The submitted version of the Plan did not include any site allocations for Gypsy and Traveller or Travelling Showpeople accommodation. In this regard, no potential sites were promoted to the Plan at any stage of Regulation 18 between 2018 and 2020. However, during the Examination, the Partnership undertook further work which led to the identification of several potential allocations. This is discussed further under Issue 7. Given the identified need for Gypsy and Traveller provision, and the availability of sites to meet this need, site allocations are necessary for the plan to be positively prepared, justified, and consistent with national policy.

121. In terms of the spatial distribution of sites, these are spread across the Plan area and are generally in rural locations. The proposed allocations are a mix of extensions to existing sites and entirely new sites, which would be capable of meeting the identified need which will largely arise from household growth.

Criteria in Policy 5

122. Policy 5 of the Plan sets out criteria against which to assess planning applications for Gypsy and Traveller and Travelling Show People sites. This approach is necessary to ensure that the Plan is positively prepared, flexible, and to provide a basis for determining planning applications on sites that are not allocated in the Plan. However, modifications to Policy 5 are necessary to identify the site allocations and the assumed capacity and delivery timescales for each. Further modifications are necessary to clarify that the loss of existing pitches will be resisted unless certain circumstances apply, which is necessary to protect the existing supply of sites. In addition, modifications to policy criteria relating to accessibility and landscaping are necessary as most Gypsy and Traveller sites are located outside of the urban area. Other modifications are necessary for clarity, and to reflect the need for adequate storage at Travelling Showpeople plots.

Self and Custom Build Housing

123. Policy 5 requires that proposals of 40 dwellings or more should provide at least 5% of plots as serviced self and custom-build plots, unless a lack of need can be demonstrated, or a 12-month marketing exercise has been undertaken. Whilst this requirement excludes proposals for flats, a modification is required to exclude other schemes where provision of self and custom build would be clearly impractical, e.g. schemes of wholly terraced housing.

124. Each Partner authority keeps a self-build and custom housebuilding register of those who wish to acquire serviced plots in order to build their own home. These registers are managed differently; in Norwich and Broadland a fee is charged to register and registrations must be renewed annually, whereas in South Norfolk there is no fee or mandatory renewal process. In the 7 years following the registers being set up in 2016, a total of 39, 92, and 719 unique registrations were received in Broadland, Norwich, and South Norfolk respectively. This is a significant range of figures. However, not everyone who wishes to build a self or custom build property will necessarily choose to register, particularly in areas where a fee is charged. Conversely, the lack of a fee may encourage registrations in other areas. Actual demand for each of the 3 Partner authorities is therefore likely to be somewhere between the figures for Norwich and South Norfolk, although this would still represent a considerable level of demand. We also note that some of the Partner Authorities count all developments of 1-5 dwellings as being self and custom build housing, which is likely to artificially inflate the assumed supply that has come forward. In these circumstances, the requirement in Policy 5 is justified in order to deliver self and custom build housing in the Plan area.

125. In terms of the supply of plots this requirement would deliver, Table 6 of the submitted Plan identifies that 'new allocations' would contribute 10,704

dwellings to the overall housing supply. However, that figure includes large sites such as Anglia Square (Ref GNLP0506), the East Norwich Strategic Regeneration Area (Ref GNLP0360/3053/R10), and other sites in Norwich city centre that will deliver mostly flatted development and so would be exempt. A number of the proposed housing allocations also have an assumed capacity of less than 40 dwellings or have now been granted planning permission. Moreover, most 'existing commitments' in the Plan housing supply already have planning permission. Accordingly, the contribution to the supply of self and custom build plots from this source is likely to be no more than around 200-300 dwellings. The policy 5 requirement is therefore unlikely to deliver an oversupply of self and custom build plots, even in combination with modified policy 7.5 (discussed separately under Issue 3).

126. A number of practical concerns regarding the delivery of self and custom build plots under Policy 5 have been raised. However, the requirement to market such plots for 12 months before they revert to open market housing could be accommodated in most build programmes with appropriate planning. Whilst a lack of demand for such plots in schemes elsewhere has been cited, it is unclear whether those examples are representative of demand in Greater Norwich. The Partnership has also drawn our attention to recent planning applications that have included provision for self and custom build plots. Moreover, the Council's Viability Appraisal Supplementary Appendix 2 suggests that this policy requirement will not reduce scheme viability. Whilst it is argued that it will complicate the planning process and some elements of the construction programme, there is no detailed evidence before the Examination that this would have a significant negative effect on viability.

Purpose-built Student Accommodation

127. Policy 5 is supportive of purpose-built student accommodation within the University of East Anglia ('UEA') campus. This approach is justified and is supported by site allocations within the campus area. However, a modification is necessary to clarify that proposals should only have regard to, rather than accord with, the UEA Development Framework Strategy as this is not a Development Plan Document. A further modification is required to clarify that purpose-built student accommodation within the UEA campus will not be required to provide an affordable housing contribution, as these sites would not be suitable for general needs housing given their campus location.

128. Away from the UEA campus, the policy sets criteria against which applications for purpose-built student accommodation would be assessed. Modifications to this part of the policy are necessary for precision, and to clarify that an offsite affordable housing contribution will be sought. The requirement to "*make provision for a policy compliant proportion of affordable housing that would be expected if the site were developed for general needs housing*" is deleted as it is ineffective. In this regard, it is not clear how the amount of affordable housing

that would otherwise be delivered could be calculated in the absence of an alternative scheme. Instead, the modified policy wording states that detailed guidance will be provided in a Supplementary Planning Document, which would allow for a more practical approach to be devised.

129. In terms of the principle of seeking affordable housing contributions from purpose-built student accommodation, our view is that this is appropriate outside of the UEA campus. In this regard, these uses are residential in nature and typically occupy sites that could otherwise be developed for general purpose dwellings.

Accessible and Specialist Housing

130. The approach to accessible and specialist housing in Policy 5 is generally sound, but the sentence requiring affordable housing to be provided in all specialist older persons housing schemes (rather than just in major development), does not accord with national policy and needs to be deleted. The affordable housing requirements are set out elsewhere in the policy. There is no need for a modification to the Policy to set out a requirement for the number of specialised units which the Plan as a whole should deliver. Some sites are allocated for this use specifically and Policy 5 is positively worded and encourages specialised, accessible and adaptable homes.

Conclusion

131. All of the modifications to Policy 5 described above are set out in **MM11**. Subject to these modifications, we consider that the Plan's approach to the provision of affordable housing, Gypsy, Traveller and Travelling Showpeople accommodation, self and custom build housing, and the housing needs of other groups, is justified, effective and consistent with national policy.

Issue 7 – Are the site allocations consistent with the Spatial Strategy and the evidence, are they justified and effective and can they be delivered?

Site Assessment Process

132. Potential site allocations were assessed using a standardised approach. This included subjecting all submitted sites to a 'red, amber, green' Housing and Economic Land Availability Assessment ('HELAA') assessment and sifting out sites that were subject to over-riding constraints. This produced a shortlist of reasonable alternatives that were subject to SA. The shortlisted sites were then discussed in detail with Highways, Development Management, Lead Local Flood Authority and Children's Services colleagues to come up with a list of

preferred sites for allocation. Whilst it is argued that this latter stage was opaque and relied on informal discussions and subjective opinion, it is inevitable that professional judgement will play a role in the allocation process. Moreover, the comments / input from each participant is recorded in the Site Assessment booklets and the reason for selecting certain sites is clearly set out. Overall, we consider this to be a robust approach that has led to the identification of sites which are generally appropriate for allocation (with a small number of exceptions). Each proposed site allocation is subject to further detailed discussion below.

133. Whilst the assessment of some sites has been challenged, the judgements that have been made are within the bounds of reasonableness in our view. The Site Assessment booklets adopt a different approach to the SA. However, that is not unsurprising given that the SA is a high level document and is just one of the pieces of information that feeds into the selection of potential allocations.
134. Overall, we are satisfied that the Partnership's approach to site assessment and selection is appropriate and is justified.

Sequential and Exception Tests

135. Several of the proposed allocations incorporate land that is at risk of either surface water or fluvial flooding. In some cases, this affects only a very small part of the site (less than 5%) and so could easily be avoided at application stage. Moreover, given the location of these areas of flood risk within the site, it is often impractical to exclude them from the allocation altogether. In such cases, we consider that the Sequential Test has been met. Separately, several brownfield allocations in and around Norwich city centre are either wholly or partly within Flood Zones 2 and 3 associated with fluvial risk from the River Wensum. However, these sites are essential to deliver the Plan's strategy which seeks to maximise brownfield development and regeneration opportunities, particularly in and around the city centre. In this regard, there are insufficient brownfield sites in accessible locations such as these to meet the Plan need for housing, which has necessitated the allocation of greenfield sites. In that context, and having regard to guidance at paragraph 163 of the Framework to take into account wider sustainable development objectives, we consider that these sites meet the Sequential Test. Moreover, with the exception of GNLP2163, each of these sites has either been previously allocated for development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) or has been granted planning permission.
136. A number of these sites are also partially within Flood Zone 3, and are therefore required to meet the Exception Test. Those sites are GNLP0360, R10, CC4B, CC7 and CC8. In the case of sites CC4B, CC7, and CC8, 21%, 2%, and 1% respectively of these sites are in Flood Zone 3, which relates to flood risk

associated with the River Wensum. These are prominent, riverside, brownfield sites in highly accessible locations with the potential to deliver significant numbers of new dwellings. The development of these sites also has the potential to enhance the river frontage and would deliver significant regeneration benefits to Norwich city centre. These wider sustainability benefits would outweigh the flood risk in our view, which in any case affects relatively small proportions of each site. With regard to sites GNLP0360 and R10, these are component parts of the East Norwich Strategic Regeneration Area, which is the largest site in the Plan and a key regeneration opportunity. The wider sustainability benefits of delivering these sites would be significant, including a substantial number of new dwellings, new bridges across the Rivers Wensum and Yare, and infrastructure that would connect the city centre to the open countryside and The Broads National Park to the east. These wider sustainability benefits would outweigh the flood risk in our view. Furthermore, each of these sites could be made safe for its lifetime, and this would be ensured through Plan Policy 2 and the site-specific policies. Consequently, the Exception Test is passed.

137. In addition, a number of the proposed Gypsy and Traveller site allocations are partially affected by surface water flood risk. In such cases, the site-specific policy requires that development of these areas be avoided. Moreover, given the very limited availability of suitable Gypsy and Traveller sites for allocation, each of these sites would meet the Sequential Test.

General Site Allocation Matters

138. A number of representations assert that detailed changes should be made to settlement boundaries within the Plan area. However, these are designated in other plans that have been adopted by each of the Partner authorities. Any detailed review of the settlement boundaries will therefore take place as part of any review of those separate plans, which are not superseded by the GNLP.

139. Modifications **MM112**, **MM141**, and **MM143** delete housing allocations in Hingham, Marsham and Reedham, for reasons which are set out below. In this regard, the Plan does not set a strategy or housing need figure that is specific to these settlements. Given that the Plan identifies a sufficient overall supply of housing it is unnecessary to allocate additional sites in these settlements, which in any case are towards the bottom of the settlement hierarchy.

Modifications that apply to multiple site-specific policies

140. A number of MMs have been applied to multiple site-specific policies. For sites within the locally designated Norwich 'Area of Main Archaeological Interest', a criterion has been added which requires the submission of an archaeological assessment at application stage. This is necessary to protect archaeological

interests in and around the area of the former walled city. For site-specific policies that refer to conservation areas, the policy wording has been modified to state “conserve, and, where opportunities arise, enhance”, rather than “conserve and enhance” to ensure consistency with national planning policy and the statutory test at s72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. A significant number of site-specific policies have also been altered to comply with modified Policy 2 in relation to reduced levels of car parking in highly accessible locations. In addition, all cross-references to Policy CS16 of the Norfolk Minerals and Waste Core Strategy have been moved to the supporting text to prevent unnecessary duplication of policies in other plans.

141. A number of site-specific policies state that “*a minimum of*”, “*at least*”, or “*up to*” a certain number of dwellings shall be permitted. However, in most cases this was not justified, and these policies have therefore been modified to state “*approximately*”, which allows for an appropriate degree of flexibility. Following these changes, statements such as “*more homes may be accommodated, subject to an acceptable design and layout, as well as infrastructure constraints*” are unnecessary and have been deleted. Separately, following the publication of the Water Cycle Study, it was no longer justified to require phasing to be in line with upgrades to certain water recycling centres, and these references have therefore been deleted.
142. The wording of several site-specific policies has been modified to remove reference to the acceptability of a proposal being subject to measures “*required by the Highway Authority*”, or requirements that the Historic Environment Record be consulted. This is necessary as a proposal could be acceptable in highways terms despite not incorporating certain measures requested by the Highway Authority. In this regard, acceding to the opinion of the Highway Authority should not be a policy requirement. Similarly, a proposal could be acceptable in terms of its impact on the historic environment without the Historic Environment Record having been consulted. It should therefore not be a policy requirement to do so. Moreover, the planning authority is responsible for determining planning applications, and not any other body.
143. We consider that adding references to actions such as ‘*early engagement*’ with a statutory authority are not necessary for soundness. It is also asserted that there is an inconsistency between policies for sites in Norwich that are adjacent to the River Wensum, as some refer to the Broads and others do not. However, that is not a soundness issue, and the Partnership is able to add such references to the supporting text should it wish to do so. Similarly, cross-references to the dark skies of the Broads are not necessary for soundness.
144. A number of the site-specific policies refer to nearby designated heritage assets, including listed buildings and conservation areas. However, it is unnecessary for soundness that these be comprehensive of every heritage asset that may be affected by a development. In this regard, designated

heritage assets are protected by other development plan policies that will apply at planning application stage.

Identification of Gypsy and Traveller, and Travelling Showpeople, site allocations

145. The Partnership has undertaken a pro-active approach to the identification of potential Gypsy and Traveller, and Travelling Showpeople, site allocations. In this regard, it has reviewed existing Council-owned sites, consulted with Gypsies and Travellers, and Travelling Showpeople residing in the Plan area, and engaged a local land agent to look for sites on its behalf. It has also encouraged the submission of potential site allocations from land owners. This proactive approach led to the identification of a pool of potential sites, which were then subject to a detailed site selection process based on that used in the HELAA. Each site has also been subject to SA and HRA assessment. In our view, this is a robust approach to identifying and assessing potential sites.
146. The capacity of each allocation has been assessed based on either input from the landowner/developer, or by applying a standard density assumption, depending on the available information. With one exception (site GNLP5004R, discussed below) the assumed capacity is realistic. The availability and delivery of each site has also been robustly assessed.
147. In terms of accessibility, most of the site allocations are in rural and semi-rural locations. The majority of these are extensions to or intensifications of existing Gypsy and Traveller sites, and their location reflects the fact that most Gypsy and Traveller sites are located outside of existing urban areas. In addition, the availability of potential Gypsy and Traveller site allocations is limited, particularly when compared to potential housing allocations. In these circumstances, a less rigid approach to accessibility is justified in comparison to that which has been applied to bricks and mortar housing. Nonetheless, we are satisfied that the accessibility of the proposed site allocations is not unacceptable.
148. In addition to the need for Gypsy and Traveller pitches, the GTAA identifies a need for 43 Travelling Showpeople plots. Whilst the Plan does not identify any allocations to meet this need, that is in the context of an absence of sites either being put forward or identified for this purpose. This was despite an extensive search process which, conversely, led to the identification of several Gypsy and Traveller site allocations. Moreover, a Statement of Common Ground has been agreed between the Partner Authorities and the Showmen's Guild of Great Britain (Eastern Region) that endorses the use of a criteria-based policy to meet the needs of Travelling Showpeople. In these circumstances, we consider this approach to be soundly based.

Housing and Mixed Use Site Allocations

Norwich

East Norwich Strategic Regeneration Area (GNLP0360/3053/R10)

149. The East Norwich Strategic Regeneration Area ('ENSRA') is a key strategic site in the Plan. It consists of three brownfield regeneration sites by the rivers Wensum and Yare, along with an area of land in front of ATB Laurence Scott. It is a major opportunity to create a new urban quarter for Norwich with the potential to be well linked into the city centre and to the countryside to the east along the river corridors. The recent developments close to Norwich City's stadium offer a glimpse of how this corridor could be extended further and link sustainably to the station and the core of the city. The principle of development here links well to the Plan's spatial vision and strategic objectives. It is a fundamental part of the future development of the city and central to the growth ambitions of the Greater Norwich area.
150. Parts of the site are allocated in the adopted Norwich Site Allocation and Site-Specific Policies Plan (2014). However, the proposed allocation in this Plan is significantly larger and includes additional land such as the Carrow Works site.
151. It is clear to us that the delivery of the whole ENSRA presents significant challenges. A number of constraints would have to be overcome, including obstacles to securing access to parts of the site. The redevelopment of the Carrow Works site requires demolition of some large buildings whilst protecting the heritage assets of the site including the listed Carrow Abbey. The Utilities site is constrained by the presence of railways and the river and would require significant investment in infrastructure to bring it to fruition. It requires an all-modes bridge across the River Wensum from the Deal Ground which itself requires a new bridge across the River Yare from the May Gurney site.
152. The delivery of the whole ENSRA relies upon a significant degree of public funding. Evidence presented by the Partnership indicates a requirement of £153M of public sector funding in order to generate a 15% profit on Gross Development Value, which is a rate considered necessary to attract private sector investment. Progress has been made on identifying and securing external finance but the certainty of an allocation in the Plan will assist the Partnership and promoters in working to bring in such funding. If not allocated in the Plan, the prospects of securing public funding through for example Homes England sources, and the consequential private sector investment, would be less likely. Parts of the site are not reliant on such funding and their early development will assist in creating a residential environment which could help to bring forward the more remote parts of the ENSRA.

153. However, the evidence before us does not support the likely prospect of the Utilities Site coming forward before the end of the Plan period. Access to it is constrained by the railway line and river, and significant infrastructure works will be required to progress its delivery. However, the Utilities site should be allocated as it is clearly a part of the ENRSA site, enables benefits to be brought to the wider redevelopment, and requires regeneration. There are no planning reasons why redevelopment cannot be commenced within the Plan period if funding and delivery constraints can be overcome.
154. Progress on the planning application for the Carrow Works has been slower than envisaged, whilst there has been progress with the reserved matters planning application for the May Gurney/Deal sites suggesting earlier delivery is more likely there.
155. For these reasons we consider that the allocation of the ENSRA is justified and positively prepared. However, we consider that the proposed timetable is overly ambitious. The evidence before us does not support the position that the whole ENSRA would be complete by 2038. Nor does it support the position that the allocation, other than on the May Gurney/Deal site, would start to deliver housing completions in 2025/26. For the reasons set out above, we do not consider that the Carrow Works site will start to deliver in the first five years. We therefore consider it necessary for a modification to the trajectory to show that the housing delivery is moved backwards within the Plan period. This has implications for the 5 year supply position which we address in Issue 8.
156. A small part of the ENSRA site is outside of the Plan area, and so a reduction of the total expected delivery within the Plan area is required. Further reductions are needed for the reasons set out above. The appropriate number of homes to be delivered on the site within the Plan period is therefore around 3000 units.
157. The detailed policy for the ENSRA, (GNP0360/3053/R10) sets out a number of site-specific requirements. In the submitted plan there is a significant degree of duplication between the Policy set out here and Policy 7.1. This is not effective. **MM13** and **MM22** address this.
158. Modifications to the policy wording are necessary to identify the key pieces of infrastructure that will need to be delivered across the component parts of the allocation. This includes the provision of bridges over the River Wensum and the River Yare, pedestrian and cycle connections, a marina, a site for a primary school, land for healthcare provision, and other highways and infrastructural works. Modifications are also required in order to clarify the role and scope of a Supplementary Planning Document which will provide detailed planning guidance for the development of the site. In this regard, the Partnership now intend to prepare an SPD instead of the 'masterplan' which was previously referred to in the policy. Further modifications are necessary to ensure that a

high quality of design is achieved, to address heritage assets within and close to the site, and to clarify the requirement for archaeological assessment. **MM22** makes these changes, which are necessary for effectiveness and to ensure that the policy is justified.

159. Separately, it is unnecessary for the policy to itemise every designated heritage asset that may be affected by the development of this site as these assets are protected by other plan policies that will apply at application stage. The level of detail in relation to design is also sufficient. In our view, none of the further changes suggested in the MM consultation are necessary for soundness.

Land adjacent to the River Wensum and the Premier Inn, Duke Street (GNLP0068)

160. This is a brownfield site located within Norwich city centre that benefits from extant planning permission for student accommodation. It is appropriate to allocate it for residential-led development, subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. These are addressed in **MM23**.

Land adjoining the Enterprise Centre at Earlham Hall (GNLP0133BR)

161. Earlham Hall is a Grade II* listed building and the site contains other listed buildings, an Historic Park and Gardens, and is in a Conservation Area. The wording of criterion 2 of the Policy needs to be modified for effectiveness to require that a heritage impact assessment will be required, and to address the soundness issues identified above. **MM24** achieves this.

Land north of Cow Drive, University of East Anglia (GNLP0133C)

162. To be effective and justified the policy needs to be modified to replace the word 'minimum' with 'approximately' when referring to the number of student bedrooms required as part of the allocation. In addition, the final paragraph is not necessary as it refers to development needing to accord with an approved planning consent. **MM25** makes these changes.

Land between Suffolk Walk and Bluebell Road (GNLP0133DR)

163. To be effective and consistent with national policy, criterion 2 needs modifying to require a heritage impact assessment to be undertaken, and to address the soundness issues identified above. Paragraph 2.39 of the supporting text refers to a requirement for opening up new areas of public access as part of proposed development. The evidence as to how this could be secured or whether it is a reasonable requirement to impose on an applicant is not convincing. This requirement is not justified and needs to be deleted. **MM26** makes these changes.

Land at Constitution Motors, 140-142 Constitution Hill (GNLP0282)

164. This is a cleared brownfield site in Norwich, with extant planning permission for 12 dwellings. It is appropriate to allocate for residential development subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. These are remedied in **MM27**.

Land at the UEA Grounds Depot Site, Bluebell Road, University of East Anglia (GNLP0133E)

165. The allocation is for future development at the university. It is expected to come forward in the later part of the Plan period. The policy makes provision for additional student bedroom accommodation with ancillary space. The allocation is sound without modification.

Former Eastern Electricity Headquarters (Dukes Wharf), Duke Street, (GNLP0401)

166. This is a mixed-use site. The housing element of the scheme could be residential or student accommodation. The allocation is sound in principle, subject to modifications that are necessary for clarity, for effectiveness in relation to heritage interpretation measures, and to address the soundness issues identified above. **MM28** resolves these issues.

Land at Whitefriars, Norwich (GNLP0409AR)

167. Most of this site was previously allocated for mixed-use development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). It benefits from planning permission for a mixed use scheme of dwellings and commercial units and is currently under construction. The site is appropriate for re-allocation in the Plan, however, modifications are necessary to address the soundness issues identified above. **MM29** addresses these.

Land south of Barrack Street, Norwich (GNLP0409BR)

168. The site is currently used as a surface car park that serves the adjacent office buildings and is located on the edge of Norwich city centre. It was previously allocated for mixed-use development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). An outline permission for 200 dwellings and office space was approved in 2016, although this has since lapsed.

169. The site promoter contends that the policy wording should specify that a multi-storey car park be re-provided as part of any re-development of the site. In this regard, it is asserted that the existing level of parking is necessary to retain occupiers of the adjacent offices, due to the ready availability of car parking at

competitor office parks on the urban edge. The policy wording does not comment on the re-provision of parking, and this is a detailed matter that could be dealt with at application stage. In this regard, this is a sensitive design location, next to the river and near to designated heritage assets, and specifying the form of any re-provided car parking is not appropriate at this stage.

170. In our view the site is appropriate to allocate for mixed use development. However, given the uncertainty about when the site will come forward, it should not be included in the 5 year supply. Modifications to the policy wording are also necessary to reflect the uncertainty regarding the number of dwellings that will be provided, to correct some factual errors, and for effectiveness. These are remedied in **MM30**.

Land adjoining Sentinel House, (St Catherine's Yard) Surrey Street (GNLP0451)

171. This is a vacant brownfield site in Norwich city centre that was granted planning permission for student accommodation in 2018. It is appropriate to allocate for residential development, subject to modifications to the policy wording which are necessary for clarity, to require replacement planting for any loss of trees, and to address the soundness issues identified above. These are remedied in **MM31**.

Land at and adjoining Anglia Square (GNLP0506)

172. This is a prominent brownfield site that is proposed as a residential-led mixed-use allocation, with the potential to deliver significant regeneration benefits to this part of Norwich city centre. It is in a sensitive location being set within a conservation area and in close proximity to a number of listed buildings. In this context, and given the likely mix of uses, the assumed figure of 800 dwellings is a reasonable approximation. However, additional wording is required to clarify that the precise number of homes should be determined at application stage in light of a detailed scheme. Other modifications to the policy wording are also necessary for clarity, effectiveness, and to ensure that the presence of designated heritage assets is adequately addressed. These matters are addressed in **MM32**.

173. The delivery of this site is reliant on a significant sum of grant funding, which has strict delivery timescales attached to it. Given these timescales and the commitment of the developer to achieve them we consider that the site will deliver as envisaged within the 5 year period.

Land at and adjoining St Georges Works, Muspole Street (GNLP2114)

174. This is a brownfield site on the northern edge of Norwich city centre. It is being promoted for development in the short term and is appropriate to allocate for

residential led mixed use development. However, modifications to the policy wording are necessary to allow for greater flexibility in terms of the uses that are specified, and to clarify that the site is capable of providing either around 110 homes or 5,000 square metres of commercial floor space, and not both. These, and other modifications which are necessary for clarity and to address the soundness issues identified above, are addressed in **MM34**.

Friars Quay Car Park, Colegate (GNLP2163)

175. A modification is required to make it clear that the site is expected to provide approximately 25 homes rather than require that to be a minimum. Such a requirement would be overly restrictive on this relatively small site. Further changes are necessary to address the soundness issues identified above. **MM35** addresses these.

Land west of Eastgate House, Thorpe Road (GNLP2164)

176. The allocation is sound in principle, subject to modifications which are necessary to address the soundness issues identified above. **MM36** addresses these.

Site at St Mary's Works and St Mary's House (GNLP3054)

177. This is a brownfield site on the northern edge of Norwich city centre. It previously benefitted from planning permission for mixed use development including 151 dwellings, but this has since lapsed. Nonetheless, the site is being promoted for development in the short-to-medium term and is appropriate to allocate for residential led mixed use development. However, modifications to the policy wording are necessary to allow for greater flexibility in the uses that are specified, and to clarify that any development should be residential led. Further modifications are required to remove unjustified requirements to enhance the adjoining churchyard and to provide housing "*in response to identified local community needs*", which is not specified for any other allocation. Modifications are also necessary for clarity, and to address the soundness issues identified above. These matters are covered in **MM37**.

14 Ber Street, Norwich (CC3)

178. This site is allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of development for residential led mixed use housing is therefore established. The allocation is sound in principle, subject to general modifications for effectiveness and to address the soundness issues identified above. **MM39** addresses these points.

Land at Rose Lane/Mountergate (CC4a)

179. This is part of a previously allocated site for mixed uses, which is mostly owned by Norwich City Council. It is expected to come forward later in the Plan period. The Council now consider that it could deliver more than 50 homes so it is necessary to modify the current wording which restricts it to that amount. **MM40** makes these changes and other modifications which are necessary to address the soundness issues identified above.

Land at Mountergate/Prince of Wales Road (CC4b)

180. This is part of a previously allocated site for mixed uses that is a significant regeneration opportunity adjacent to the river. The principle of the allocation has been established and is justified. As with CC4a, the site is expected to deliver towards the later part of the Plan period. The Policy erroneously refers to a requirement to retain public open space whereas it should refer to provision of new public open space. **MM41** makes these changes and other modifications that are necessary to address the soundness issues identified above.

Hoborough Lane, King Street (CC7)

181. The allocation is sound in principle, subject to modifications which are necessary for clarity and to address the soundness issues identified above. **MM42** makes these changes.

King Street Stores, Norwich (CC8)

182. The allocation is sound in principle. However, criterion 3 of the policy and the supporting text at paragraph 2.140 need to be amended to refer to the need to retain the trees on the King Street frontage as part of any development proposal. The trees are covered by a Tree Preservation Order and the policy needs to be clear about the importance of retaining the trees which currently make an important contribution to the street scene. Further modifications are necessary to address the soundness issues identified above. **MM43** makes these changes.

Land at Garden Street and Rouen Road, Norwich (CC10)

183. The allocation of this site is sound in principle, subject to modifications to remove wording which unnecessarily repeats national policy on design, and to address the soundness issues identified above. **MM44** addresses these.

Land at Argyle Street, Norwich (CC11)

184. The allocation of this small site is sound in principle subject to modifications that are necessary to address the soundness issues identified above. **MM45** addresses these.

Norwich Mail Centre, 13-17 Thorpe Road (CC15)

185. Although currently in commercial use, the evidence indicates that there is a reasonable prospect that this site will come forward as a housing site in the Plan period. It is currently allocated in Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of redevelopment is therefore established. Its allocation in this Plan is sound subject to modifications to specify the designated heritage assets that any redevelopment proposals would have to respect, and to clarify policy wording. **MM47** addresses these.

Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way (CC16)

186. This site was previously allocated for mixed-use development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). Much of the site benefits from planning permission for housing development, and it remains appropriate to re-allocate in this Plan. However, modifications to the policy wording are necessary to address the soundness issues identified above, which are remedied in **MM48**.

Land at 140-154 Oak Street and 70-72 Sussex Street, Norwich (CC19)

187. This site was allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) as two separate sites and the principle of redevelopment is therefore established. The evidence indicates it is likely to come forward in the Plan period. The boundary is proposed to be amended slightly from that in the previous plan. The allocation is sound in principle, subject to correcting the address of the site in the Policy heading (to 150-154 Oak Street and 70-72 Sussex Street) and modifying the policy wording to address the soundness issues identified above, together with consequential changes to the supporting text. **MM49** makes these changes.

Land to rear of City Hall, Norwich (CC24)

188. This site lies directly behind the City Hall in the commercial heart of Norwich city centre. It was previously allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of development is therefore established. The evidence indicates that with a more committed and positive

approach to disposal/redevelopment from the City Council it will come forward in the period of this Plan. The allocation is sound in principle, subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. **MM50** makes these changes.

Westwick Street Car Park Norwich (CC30)

189. This small site was previously allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of development is therefore established. It is likely to come forward in the period of this Plan and its allocation is, in principle, sound. The policy wording needs to be amended to address the soundness issues identified above. **MM51** addresses this.

John Youngs Limited 24 City Road (R7)

190. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. **MM54** addresses these issues.

Site of former gas holder at Gas Hill, Norwich (R13)

191. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary for clarity, to specify nearby heritage assets, and to address the soundness issues identified above. **MM55** addresses these issues.

Land at Ketts Hill and east of Bishop Bridge Road, Norwich (R14/R15)

192. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. **MM56** addresses these issues.

Site of former Van Dal Shoes, Dibden Road, Norwich (R17)

193. The allocation of the site is sound in principle. The policy needs to be modified to replace 'minimum' with 'approximately' given the evidence and to make a consequential change to the supporting text. **MM57** addresses these issues.

Site of former Start Rite Factory, 28 Mousehold Lane (R18)

194. This is a brownfield site that benefits from planning permission for a 79 bed residential care home and 42 supported living apartments. At the time of the hearings, construction was underway. The allocation is sound in principle

subject to modifications to the policy wording which are necessary for clarity to address the soundness issues identified above. These are remedied in **MM58**.

Land north of Windmill Road, Norwich (R19)

195. This is a vacant site in Norwich, surrounded by existing housing, that was granted planning permission for 17 dwellings in 2019. It is appropriate to allocate for residential development, subject to modifications which are necessary to address the soundness issues identified above. These are remedied in **MM59**.

Land east of Starling Road, Norwich (R20)

196. This is a cleared brownfield site in close proximity to the northern edge of Norwich city centre. Planning permissions have been granted on different parts of the site for a total of 28 dwellings. Given these separate permissions, a reference in the policy wording to comprehensive development is not justified. It is appropriate to allocate for residential development, subject to modifications to the policy wording which are necessary for clarity and effectiveness. These are addressed in **MM60**.

Land at Hurricane Way, Airport Industrial Estate, Norwich (R29A and B)

197. These are two previously allocated sites within the Airport Industrial Estate. The principle of development is therefore established. Although they have not yet come forward for development, there is evidence to indicate that they will do so in this plan period. The allocation for both parcels is sound subject to modifications that are necessary to address the soundness issues identified above. This is addressed in **MM61**.

Heigham Water Treatment Works, Waterworks Road, Norwich (R31)

198. The site was allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014) and the principle of development is therefore established. Although reduced in extent to reflect the operational requirements of Anglian Water, the allocation of the site is sound in principle subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM63** addresses these issues.

Mile Cross Depot, Norwich (R36)

199. This site was allocated in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). The principle has therefore been established. The site has been cleared and is the ownership of Norwich City Council. Planning proposals

are being advanced by the Council and the evidence indicates that homes could be completed in on the site early in the plan period, with some within the first five years. The allocation is sound in principle but the policy needs to be clarified for effectiveness to refer to the number of homes not being a minimum and to specify that the final number of homes to be delivered may be dependent upon the scale of community uses delivered as part of the scheme. **MM64** addresses these issues.

The Norwich Community Hospital site, Bowthorpe Road (R37)

200. This is an NHS hospital site within Norwich, part of which was allocated for housing development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). It benefits from outline planning permission to provide a new hospital, residential care home, extra care units, key worker units, and other residential units through the conversion of Woodlands House. Part of the site falls outside of this permission, and this land has the potential to deliver a further 50 dwellings. However, subsequent meetings with the Trust indicate that various development options are being considered, and in these circumstances, the site is unlikely to contribute towards the 5 year supply. Whilst this is an appropriate site to allocate for mixed use development, modifications to the policy wording are necessary to reflect the number of dwellings indicated in the outline permission, which is addressed in **MM65**.

Three Score, Bowthorpe (R38)

201. This Council-owned site was previously allocated for housing development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). It benefits from outline planning permission for 1000 dwellings, a proportion of which have now been developed. Key pieces of infrastructure have also been implemented including a spine road through the site. It is currently being developed by a Council-owned local housing company with a significant proportion of affordable housing, and given the evidence that has been presented, the delivery assumptions appear to be realistic. The site is appropriate to allocate for housing development. However, modifications to the policy wording are necessary to correct the residual capacity of the site. This is remedied in **MM66**.

Land west of Bluebell Road, and north of Daisy Hill Court/Coralie Court, Westfield View (R42)

202. This is a previously developed site, the majority of which was allocated for over-55s housing in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). Part of the site now benefits from planning permission for 50 dwellings, and a masterplan for the whole site has been agreed. It is appropriate to re-allocate for residential development without modification.

Site of former Earl of Leicester Public House, 238 Dereham Road, Norwich (R33)

203. This small vacant brownfield site is allocated for 10 homes. It was previously allocated and granted planning permission. It is expected to come forward in this plan period. It is appropriate to re-allocate for residential development without modification.

Land at Lower Clarence Road (CC13), Ipswich Road Community Hub (R2) and 153 Ber Street (CC2)

204. These three sites are no longer available for development. Consequently, the allocations are not justified and should be deleted. **MM38, MM46 and MM53** achieve this.

The Urban Fringe

Colney Hall, Watton Road, Colney (GNLP0253)

205. The allocation is for a scheme of specialist housing and for research/healthcare uses. Progress has been made with the drawing up of a planning application and the evidence indicates that the site will be delivered in the Plan period. The allocation is sound, but the Policy wording needs to be modified to clarify when a masterplan would be required, that landscape and archaeological assessments will be required given the historic and heritage value of the Hall and gardens, and to address the soundness issues identified above. **MM72** makes these changes.

Land north of the A11, Cringleford (GNLP0307/GNLP0327)

206. This strategic allocation is part of a wider area of land identified for development in the Cringleford Neighbourhood Plan (2014). Planning permission has been granted for 650 dwellings on the north eastern part of the site. However, the south western part of the site did not benefit from planning permission at the time of the hearings. The proposed allocation and policy assume that this south western area will deliver an additional 410 dwellings, which would result in a total site capacity of 1,060 dwellings. Whilst Policy GNLP0307/GNLP0327 refers to 1,710 homes, that is an error and includes completions on neighbouring sites.

207. The assumed 410 dwellings on the south western part of the site represent a significant uplift on the numbers given in the Cringleford Neighbourhood Plan. However, that is due to higher densities being achieved on the north eastern part of the site, and on neighbouring sites. Moreover, the Neighbourhood Plan was made around 10 years ago before the detailed site layouts were known. Given the size of the remaining area of the site, an uplift of 410 dwellings

assumes an appropriate density for this location. In this regard, the Highway Authority has not raised any objection to this uplift on highways or network capacity grounds. In any case, the policy wording requires that a Transport Assessment accompany any future application to confirm that the proposed improvements to the A47 Thickthorn Interchange can accommodate this uplift. This will ensure that the highways implications of any detailed proposal are fully assessed.

208. At the hearings, views were expressed that the assumed number of dwellings for this site should be expressed either as a cap or as a minimum. However, we consider the Partnership's approach to be justified and sufficiently flexible to allow the precise number of dwellings to be determined at application stage, in light of a detailed scheme and supporting technical information. The site is appropriate to allocate for residential development, including for the number of dwellings envisaged. However, modifications to the policy wording are necessary to correct factual errors, remove reference to a bus route through the site, and to clarify that a landscape buffer should be provided outside of the settlement limit. These are addressed in **MM78**.

Land east of Cator Road and north of Hall Lane, Drayton (DRA1)

209. This site was previously allocated in the Broadland Site Allocations DPD (2016) and benefits from planning permission for housing development. It is currently under construction and is suitable to re-allocate for residential development, subject to modifications to the policy wording which are necessary to resolve the soundness issues identified above. These are addressed in **MM80**.

Land south and east of Easton (EAS 1)

210. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and benefits from planning permission for residential development. The site is under the control of a housebuilder, reserved matters approvals are in place on parts of the site, and areas are currently under construction. Based on the submitted evidence, the delivery assumptions appear to be realistic. The allocation of this site is sound in principle, subject to modifications to the policy wording to reduce its capacity to 962, as part of the site now has permission for other uses, and to address the soundness issues identified above. These are addressed in **MM81**.

Land at Hospital Grounds, southwest of Drayton Road, Hellesdon (HEL1)

211. The allocation of this site for housing and employment uses is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM82** makes these changes.

Land at the Royal Norwich Golf Club, either side of Drayton High Road, Hellesdon (HEL2)

212. This site was allocated in the Broadland Site Allocations DPD (2016) and benefits from outline planning permission for residential development. The site is under the control of a housebuilder, reserved matters approvals are in place on parts of the site, and areas are currently under construction. Based on the submitted evidence, the delivery assumptions appear to be realistic. The site is appropriate to allocate for residential development, subject to modifications to the policy wording which are necessary to resolve the soundness issues identified above. These are addressed in **MM83**.

Land to the west of Green Lane West, Rackheath (GNLP0172)

213. The site now has planning consent and the allocation is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM85** makes these changes.

Land at Heathwood Gospel Hall, Green Lane West, Rackheath (GNLP0351)

214. This is a small brownfield site within the village. Its allocation is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM86** addresses these.

Land off Blue Boar Lane/Salhouse Road, White House Farm, Sprowston (GNLP0132)

215. This is a large allocation close to an area of recently developed housing on the fringe of the city within the Growth Triangle. New housing lies to the west and south of the site.

216. The allocation of the site is sound in principle. The Policy requires provision to be made for supporting infrastructure, including the potential for a new secondary school or a new primary school. It is not known at this stage whether the secondary school will be needed and so to be effective and justified, the policy needs to be amended to refer to either option and the resulting land use requirements. Based on the evidence submitted to us during the examination, it is still appropriate to refer to the option of the school in the policy, even though some of the delivery timetable and expectations may have altered since the submission of the Plan. The policy enables a flexible approach and the triggers provide for various options. The wording is justified and effective.

217. The expected delivery on the site needs to be reduced given updated evidence from the site developer/promoter. This leads to a reduction of 660 homes being delivered on this site in the Plan period.

218. **MM87** addresses these issues.

Land between Fir Covert Road and Reephams Road, Taverham (GNLP0337R)

219. This is a large urban extension that would sit between the A1270 and the northern edge of Taverham. The site is well contained by major roads and the existing built-up area and it represents a logical extension to the settlement. There are no over-riding constraints that would prevent the development of the site, and it would be capable of providing a range of services and facilities onsite, including a local centre, open space, and land for a new primary school and medical centre. It would also benefit from facilities and public transport connections in the existing settlement. This is an appropriate site for housing development, albeit modifications to the policy wording are necessary for clarity, to address the soundness issues identified above, and to provide appropriate guidance in relation to the proposed local centre. **MM88** addresses these points.

Land off Beech Avenue, Taverham (GNLP0159R)

220. The principle of the allocation is sound. The site is suitable for housing and there are no constraints to prevent it coming forward. However, it emerged during the examination that a planning application for a slightly large area of land had been submitted and that the Partnership were considering it favourably. Broadland District Council Planning Committee has subsequently resolved to grant permission for the development. In light of this, it is justified that the site area should be enlarged to reflect the planning application boundary and the number of houses expected on it is increased from 12 to 25. The policy should therefore be modified accordingly. **MM89** addresses these points.

Land on White Horse Lane and to the rear of Charolais Close & Devon Way (TROW 1)

221. The site benefits from full planning permission for residential development and is currently under construction. It is appropriate to allocate for residential development, subject to modifications to the policy wording to remove a requirement to provide a masterplan, which is unnecessary given that the entire site now has planning permission and much of it has already been built out. This is remedied in **MM90**.

Main Towns

Land south of Burgh Road and west of the A140, Aylsham (GNLP0311, 0595 and 2060)

222. This is an allocation on the edge of Aylsham between the existing built up area of the town and the A140. It is currently farmland. It is open in character but has well defined boundaries. It and the nearby site off Norwich Road are the two Plan allocations for the town.

223. The policy for the site looks to secure a number of infrastructure related requirements including land for a new primary school. The Town Council is concerned about the impact that the development would have on the town's infrastructure capacity, highway network and environment but there is no demonstrable evidence that the allocation is not justified.

224. The allocation is sound subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM91** addresses these points.

Land at Norwich Road, Aylsham (GNLP0596R)

225. This is another site between the town and the A140. It is of a similar size to the Burgh Road site. The Town Council is concerned about the impact that the development would have on the town's infrastructure capacity, highway network and environment but there is no demonstrable evidence that the allocation is not justified. It is soundly based in principle.

226. For effectiveness, it is necessary to modify the policy wording to require the phasing plan to be submitted with or in advance of the first permission, and to modify the specified pedestrian and cycle access locations based on more recent transport evidence. These, and other modifications necessary to address the soundness issues identified above, are covered in **MM92**.

Land at Frontier Agriculture Ltd, Sandy Lane, Diss (GNLP0102)

227. This site is currently occupied by industrial uses that would need to be relocated. We consider that the site is not likely to be available as early as the Partnership and the site promoters are expecting but that it will be delivered in the Plan period. It is in an accessible location within the town, situated adjacent to the railway station. It is a sound allocation in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM93** rectifies this.

Land south of Spirketts Lane, Harleston (GNLP2108)

228. This site lies between the built-up area of Harleston and the A143. It is well connected to the town. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM94** addresses this.

Land at Spirketts Lane, Harleston (HAR 4)

229. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and the principle of development has been established. It lies to the north of allocation GNLP2108. Proposals to bring it forward for development are now being progressed by the landowner. It is sound, subject to a modification for effectiveness to remove the reference to more homes being accommodated subject to an acceptable design and layout. This reference is not necessary. **MM95** addresses this.

Land off Station Hill, Harleston (HAR 5)

230. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and the principle of development is therefore established. The evidence indicates that it is likely to come forward in this plan period. The allocation of the site is sound in principle, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. **MM96** addresses this matter.

Land at Briar Farm, Harleston (GNLP2136)

231. This is an allocation on the edge of Harleston between the built up area and the A143. It is a logical and well defined extension to the settlement that is likely to deliver in the Plan period. The allocation is sound without modification.

Land at Johnson's Farm, Wymondham (GNLP0354R)

232. The site is an extension to the existing built up area on the south western side of Wymondham. Its allocation is sound in principle. The policy wording needs to be modified for effectiveness to make it clear that a masterplan and transport assessment must be submitted in advance of or with the first planning application, and to ensure that a pedestrian/cycle access point at Preston Avenue will be required. **MM101** makes these changes.

Land at Tuttle Lane, Wymondham (GNLP3013)

233. This is a reasonably small site on the northern side of the town. It is self-contained and can be easily accessed from Tuttle Lane. The allocation is sound in principle, subject to modifications which are necessary to make it clear that an ecological assessment must be submitted, given the potential need for mitigation along the River Tiffey and its tributaries. **MM102** addresses this.

Key Service Centres

Land west of Acle (GNLP0378R/GNLP2139R)

234. This is a relatively large greenfield extension to the west of the existing settlement and adjacent to a smaller allocation (ACL1) that is currently under construction. The site would be accessible to existing services, facilities, and public transport connections in Acle and would be capable of providing new areas of open space. The development of this site would allow for a new link road to be constructed between Norwich Road and South Walsham Road through the site that would bypass the centre of Acle, which currently experiences significant congestion. This is a unique benefit of the scheme. There is also no detailed evidence before us to indicate that such a requirement would make the scheme unviable or to substantiate a purported cost of £3 million. Whilst the site is subject to potential reservoir flooding in the event of a breach, the Strategic Flood Risk Assessment states that this risk is “*relatively low*”, due to the standard of inspection and maintenance required under the Reservoir Act 1975. It also states that this risk is less than either river or surface water flood risk. Moreover, mitigation measures could be secured at application stage.

235. Separately, Policy GNLP0378R/GNLP2139R requires that development address the proximity of the site to the Broads, and a further specific reference to its dark skies is therefore unnecessary. In addition, the presence of a water main within the site boundary is a matter that is capable of being dealt with at application stage. This is an appropriate site for housing development, albeit modifications to the policy wording are necessary for clarity, to ensure the link road is provided across the land ownership boundary, and to address the soundness issues identified above. These are remedied in **MM103**.

Land to the north of Norwich Road, Acle (ACL1)

236. This site benefits from planning permission for residential development, is currently under construction, and a significant number of dwellings have already been completed. The site is suitable to allocate for residential development without modification.

Land south of Acle Station, between Reedham Road and New Reedham Road, Acle (ACL2)

237. This site benefits from planning permission for residential development and is currently under construction. The site is suitable to allocate for residential development, subject to modifications to the policy wording that are necessary for effectiveness to clarify which highway improvements are required. This is remedied in **MM104**.

Land adjacent to Norwich Camping & Leisure, off Yarmouth Road, Blofield (GNLP2161)

238. This is a small brownfield site within the existing urban area that is in walking distance of existing services, facilities, and public transport connections in Blofield. It is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary for clarity and effectiveness, and to remove the requirement to provide “possible alterations of former trunk road” as this is vague and disproportionate given the number of dwellings proposed. These are remedied in **MM106**.

Land to the south of A47 and north of Yarmouth Road, Blofield (BLO1)

239. This site benefits from planning permission for residential development, is currently under construction, and a significant number of dwellings have already been completed. The site is appropriate to allocate for residential development, subject to modifications to the policy wording to correct factual errors and to address the soundness issues identified above. These are remedied in **MM107**.

Land north of Hethersett (HET 1)

240. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and benefits from outline planning permission for residential development. It is under the control of a housebuilder, reserved matters approvals are in place on much of the site, and significant areas have been developed out. The allocation also assumes an uplift of 200 dwellings over and above the capacity set out in the outline permission. This is due to the site having been developed to a higher density than originally envisaged, and the proposed uplift is supported by the developer. Based on the submitted evidence, the uplift and the site delivery assumptions appear to be realistic. The site is appropriate to allocate for residential development, although several modifications to the policy wording are necessary. These include the deletion of a requirement to comprehensively masterplan the site, which is unnecessary given much of it has reserved matters consents in place and large areas are now developed. Moreover, modifications are required to clarify that the policy

applies to all undeveloped parts of the site and not just the 200 dwelling uplift, and to remedy other soundness issues. These are addressed in **MM110**.

Land north of Grove Road, Hethersett (HET 2)

241. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) for extra care housing. It sits immediately adjacent to allocated site HET1 and the principle of development has been established. It will complement the development of that site.

242. The delivery of this site is dependent upon progress of the HET1 site to secure access through to it. Nevertheless, the evidence indicates that it is likely to come forward in the Plan period. A modification is required for effectiveness to remove an erroneous reference to the JSC in the Policy and to clarify some site-specific requirements. **MM111** addresses these issues.

Land north of Springfield Way and west of Dereham Road, Hingham (GNLP0503)

243. The site owner has requested that this allocation be deleted from the Local Plan, as they do not intend to release it for development. Accordingly, there is not a reasonable prospect that it will be available during the Plan period, and it is therefore not a sound allocation. This is remedied by **MM112** which deletes the allocation and its supporting policy.

Land south of Norwich Road, Hingham (GNLP0520)

244. The site consists of open agricultural land on the south eastern edge of Hingham. It is in easy walking distance of a nearby primary school, convenience store and bus stops, and a pedestrian route via Granary Way would connect the site to the footpath along Norwich Road. In this regard, Granary Way is a lightly trafficked cul-de-sac and the use of this shared surface route would not raise safety concerns. The walking route to Hingham centre would be more convoluted and would include narrow sections of footway and several crossings of Norwich Road. Whilst this may deter some trips to the centre, there would be a direct bus service, and the site would still have other services and facilities in easy walking distance. A vehicular access to the site is capable of being taken from Norwich Road without removing protected trees, which is accepted by the Highway Authority. The precise location of the pedestrian refuge would be determined at application stage.

245. The northwest corner of the site is subject to surface water flood risk, comprising a flow path that runs from the Industrial estate to the north, through the site, and on to land to the south west. However, only a relatively small proportion of the site itself is subject to this flood risk. Moreover, the land promoter asserts that its mitigation scheme would be capable of reducing the

existing level of flood risk experienced by land and properties to the south west. In this regard, we consider that the area of land subject to flood risk should remain within the allocation so that this mitigation can be required by the site-specific policy. The policy wording needs to be modified to require that the part of the site subject to surface water flood risk should not be built on, in accordance with the Sequential Test. These matters, and others relating to clarity and effectiveness, are addressed in **MM113**. Separately, a drainage scheme ensuring that there is no increase in run-off from the site is capable of being secured at application stage.

246. The Grade I listed St Andrews Church is located in the centre of Hingham and its tower is visible in longer views from a number of directions. In this regard, views of the tower are currently available from along parts of Norwich Road as it approaches and then as it enters Hingham. However, longer views of the church from along Norwich Road (outside of Hingham) are unlikely to be significantly affected by the allocation given the height of the tower, the topography of the area, and the likely height of any development. Views of the church as the road enters Hingham are fleeting and available predominantly to motorists, as there are no pedestrian footpaths in this location. Whilst the allocation would be visible in longer views of the church tower from along parts of Seamere Road, these views are relatively distant in nature, and boundary planting could be used to soften any impact. In our view, any effect on the setting of the St Andrews Church is capable of being dealt with at application stage. The site is also some distance from the listed buildings to the south and there would be no impact on their setting. We further note that Historic England has not objected to the allocation on these grounds.
247. The proposed allocation is opposite to an industrial estate that accommodates some B2 uses. However, it is located on the far side of Norwich Road, and there is scope to provide a further buffer within the site if that is considered necessary. In this regard, the assumed capacity of 80 dwellings would allow for significant areas of the site to be occupied by open space, planting, and flood risk mitigation. Moreover, a number of existing properties back directly onto the industrial estate, and there is no evidence before the Examination that this has resulted in an unacceptable level of noise or disturbance.
248. There would be a small loss of countryside associated with the allocation. However, the site comprises a relatively flat agricultural field that is bounded on 2 sides by the existing built up area. It is well related to the existing settlement and most views of it from the surrounding area are seen against the backdrop of existing townscape. Accordingly, the site does not comprise a 'valued landscape' and any harm to the wider landscape would be minor. Separately, whilst the site is around a kilometre from the Sea Mere SSSI, that is a matter which is capable of being dealt with at application stage.

Land to the east of Beccles Road, Loddon (GNLP0312)

249. This site comprises open land on the eastern edge of Loddon. It is well related to the existing settlement and is contained by a band of trees along its eastern edge. It is also accessible to existing services, facilities, and public transport connections in Loddon, and is not subject to any over-riding constraints that would prevent it from being developed. The allocation is sound in principle, subject to modifications to the policy wording that are necessary to address the soundness issues identified above. These are addressed in **MM115**.

Land off Langley Road, Chedgrave (GNLP0463R)

250. This site comprises open agricultural land on the northern edge of Chedgrave. It is reasonably well related to the existing settlement and is accessible to services, facilities, and public transport connections in Chedgrave. Whilst the site is raised above the existing properties to the south, the assumed capacity is low and would allow for landscaping and open space to be provided to manage this transition in levels. Any landscape harm would be localised and could be mitigated by landscaping and boundary planting. The site is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary to clarify the access requirements and for effectiveness, which are addressed in **MM116**.

Land off Broomhill Lane, Reepham (REP1)

251. This site was allocated in the Broadland Site Allocations DPD (2016) and a planning application has recently been submitted for the site. Discussions in relation to that application have led to an alternative solution with regard to the proposed sports hall which is now to be located off site. The evidence presented to us at the examination from the Partnership and the promoter was that this off-site solution was the option now being pursued. In the light of this, it is not justified to require a sports hall to be provided on site. Accordingly, modifications are necessary to remove this requirement, and to address the soundness issues identified above. **MM119** makes these changes.

252. It is appropriate that the policy expectation remains at approximately 100 dwellings even though this figure may not necessarily be consistent with the planning application before the Council. In this regard, the figure in the policy is not a cap. There is also no compelling evidence to adjust the site boundary.

Land at former station yard, Station Road, Reepham (REP2)

253. This site is located within the settlement boundary and benefits from planning permission for a care home, assisted flats, and bungalows. It is suitable to allocate for residential development without modification.

Village Clusters

Land east of Woodbastwick Road, Blofield Heath (Policy GNLP1048R)

254. The site comprises open land on the edge of the settlement that is surrounded by existing built development on 3 sides. It is in walking distance of services, facilities, and public transport connections in the village. The site is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, a modification to the policy wording is necessary to provide clarity regarding tree and hedgerow re-provision, as some removal is likely to be required to accommodate a new access and footway. Further modifications are necessary to require appropriate ecological surveys for any protected species that may be present, and to address the soundness issues identified above. These are addressed in **MM120**.

Land to the north of Blofield Corner, Blofield Heath (BLO5)

255. This site is well related to the existing settlement and benefits from planning permission for housing development. It is suitable to allocate for residential development without modification.

Land east of Aylsham Road, Buxton with Lamas (GNLP0297)

256. This is a relatively small open site on the northern edge of the village. It is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary to clarify imprecise requirements relating to the 30 mph speed limit area, noise and vibration arising from the railway line, and the loss of any trees and hedgerows at the proposed access point. A further modification requiring the provision of boundary landscaping is necessary to provide an appropriate edge to the settlement. These are remedied in **MM121**.

Land east of Lion Road, Buxton (BUX1)

257. This site was allocated in the Broadland Site Allocations DPD (2016) but has not yet come forward. There is a reasonable prospect that it will come forward for approximately 20 homes in the Plan period. Its allocation is justified without modification.

Land east of Gayford Road, Cawston (GNLP0293 and CAW2)

258. Site CAW2 was previously allocated for development in the Broadland Site Allocations DPD (2016), whereas site GNLP0293 is proposed as an extension to it. Together, these adjoining sites effectively form a single allocation, and they

are in the same ownership. There are no over-riding constraints that would prevent the development of the site, and it is in walking distance of services, facilities, and public transport connections in the village, including a primary school and a small convenience store. It is an appropriate site to allocate for housing development. However, it is confusing for these adjoining sites to have separate policies. Accordingly, **MM122** and **MM123** delete Policies GNLP0293 and CAW2 and combine the sites to form a single allocation. This is subject to a new policy with modified wording that incorporates changes that are necessary to address the soundness issues identified above. This is set out in **MM124**.

Land at Rectory Road, Coltishall (COL1 and GNLP2019)

259. Site COL1 was previously allocated for development in the Broadland Site Allocations DPD (2016), whereas site GNLP2019 is proposed as an extension to it. Together, these adjoining sites effectively form a single allocation. The Highway Authority does not object to the site on highway safety or access grounds, and this matter has been considered in detail during the assessment of recent planning permissions on COL1. There are no other over-riding constraints that would prevent the development of the site, and it is in walking distance of services, facilities, and public transport connections in the village, including a primary school and a convenience store. It is an appropriate site to allocate for housing development in our view. However, it is confusing for this site to be subject to 2 separate policies. Accordingly, **MM125** and **MM126** delete Policies GNLP2019 and COL1 and combine these sites to form a single allocation. This is subject to a new policy with modified wording that clarifies which highway improvements are required and addresses the soundness issues identified above. This is set out in **MM127**.

Land at Jordans Scrapyard, Coltishall (COL2)

260. The site was allocated in the Broadland Site Allocations DPD (2016) and there is an expectation that it will come forward for housing in this plan period. Its allocation is justified, subject to modifications that are necessary to address the soundness issues identified above. **MM128** makes these changes.

Land west of Foundry Close, Foulsham (GNLP0605)

261. This site is an open piece of land on the western edge of Foulsham that adjoins the existing settlement to both the south and east. It is in walking distance of services and facilities in the village, including a primary school and a small convenience store. Whilst it would be accessed via relatively narrow estate roads, it would generate only a modest level of traffic given the number of dwellings that are envisaged. In our view, the access route would be of adequate width for a scheme of this size. Moreover, the footways are clearly demarcated despite being the same height as the carriageway, and are set

within a low speed, low traffic, environment. This does not raise significant highway safety issues, and it is noted that the Highway Authority has not raised any concerns in this regard. Similarly, the low level of traffic generated by the scheme would not place any significant additional pressure on High Street.

262. Any loss of hedgerow to create an access would be small-scale and could be compensated for by new planting within the site. The presence of a ransom strip across the site access is noted but given this is owned by a housing association rather than a householder, it is unlikely to prevent development from taking place. Furthermore, given the limited number of pupils that would be generated by an allocation of this size, it would be highly unlikely to necessitate an expansion of the school. Whilst planning permission has recently been granted for housing development elsewhere in the village, that does not make the allocation unsound given the requirement for housing across the Plan area. In our view, the site is appropriate to allocate for housing development subject to modifications to the policy wording which are necessary for clarity and to address the soundness issues identified above. This is addressed in **MM129**.

South of Bowlers Close, Freethorpe (GNLP2034)

263. This is a relatively small site that is well-contained by existing built development and a band of trees along its southern boundary. It is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary in relation to the boundary trees for clarity and effectiveness. Other modifications are necessary to address the soundness issues identified above. These are remedied in **MM131**.

Land north of Palmer's Lane, Freethorpe (FRE1)

264. This site benefits from planning permission for housing and has now largely been completed. It is suitable to allocate for residential development, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. These are addressed in **MM132**.

Land at Bridge Farm Field, St Faiths Close, Great Witchingham (GNLP0608R)

265. This is a relatively small greenfield site that adjoins the existing settlement to both the south and west. Whilst it is near to a County Wildlife Site, the County Council's Natural Environment Team have advised that this would not preclude development and that it is unnecessary to require a buffer to be provided within the site. There are no other over-riding constraints that would prevent the development of the site, and it is appropriate to allocate for housing development. However, detailed modifications to the policy wording are necessary for clarity and to address the soundness issues identified above, as

set out at **MM133**. Separately, whilst the site has been promoted to the GNL by the landowner, its delivery timescales are unclear. Accordingly, the site is not included within the assumed 5 year supply.

Dog Lane, Horsford (GNLP0264)

266. This is a brownfield site within the existing built-up area. The north western part of the allocation (accounting for around 25% of the site area) is in Flood Zone 2 and it is necessary to modify the boundary to remove this land, in accordance with national policy. The requirement to maintain a 20-metre buffer between the watercourse and proposed garden areas will also reduce the net developable area. These matters necessitate a reduction in the assumed capacity to 30 dwellings. These, and other modifications that are necessary to address the soundness issues identified above, are addressed in **MM134**.

Land to the west of West Lane, Horsham St Faith (GNLP0125R)

267. The site forms part of an agricultural field on the edge of the historic village of Horsham St Faith. Whilst it is close to several designated heritage assets, including the Grade I listed Church of St Mary and St Andrew, a scheduled monument, and the Horsham St Faith Conservation Area, the site is capable of being developed without harming the settings of these assets. In this regard, it is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, modifications to the policy wording are necessary to ensure that nearby heritage assets are protected in line with national policy. The proposed requirement for 2 site accesses to be provided was also acknowledged to be unnecessary by the Highway Authority in the hearing sessions and so is deleted. A further modification relating to the provision of frontage footways is also necessary given that existing hedgerows may prevent a frontage footway, subject to further design work. Other detailed modifications are necessary for clarity and to address the soundness issues identified above. These matters are addressed in **MM135**. Separately, it is asserted that other developments have recently come forward in the village, however, that does not in itself make the allocation unsound given the requirement for housing across the Plan area.

Land east of Manor Road, Newton St Faith (HNF1)

268. The site benefits from planning permission for housing and is currently under construction. The site is suitable to allocate for residential development, subject to modifications to the policy wording that are necessary to clarify the highway improvements required, and to remove an unjustified reference to onsite play provision which does not feature in the planning permission. These are addressed in **MM136**.

West of Blofield Road, Lingwood (GNLP0380)

269. This site comprises open agricultural land on the edge of Lingwood. It is well related to the existing built-up area and adjoins it to both the south and east. An appropriate access can be achieved and it is noted that the Highway Authority is supportive of the allocation. It is not subject to any over-riding constraints and the allocation is sound in principle. However, modifications to the policy wording are necessary for clarity, to ensure compensatory planting for any loss of trees, and to specify the highway measures that are required. These are addressed in **MM139**.

East of Station Road, Lingwood (GNLP4016)

270. The site consists of open land on the eastern edge of Lingwood that is near to both a primary school and a train station. It is not subject to any over-riding constraints and the allocation is sound in principle. However, modifications to the policy wording are necessary for clarity and to ensure compensatory planting for any loss of trees. These are addressed in **MM140**.

Land south of Le Neve Road, Marsham (GNLP2143)

271. This site is located on the southern edge of Marsham in close proximity to the Grade I listed All Saints Church. The surrounding landscape is relatively flat and the church tower is a prominent feature in longer views from the public footpaths to the west and south west, and from Allison Street to the south. At present, most of the properties to the west of the church are bungalows that are set down in the landscape, and the village edge follows a clearly defined line that sweeps away from the church to the north west. In contrast, the proposed allocation would be on higher ground and would jut out prominently into the open setting of the church. In this regard, development of this site would introduce a discordant, elevated peninsula of modern development that would interrupt important views of the church and its tower from the west, and visually compete with it when viewed from the south or southwest. There would be a harmful effect on several existing views of the church, including those out from the churchyard itself, that would negatively affect how the building is experienced. There are no obvious design solutions that could adequately mitigate this harm, and even a smaller allocation would still result in significant negative effects. Whilst the level of harm would be 'less than substantial', the public benefits including the provision of new market and/or affordable housing and the provision of expansion land for the adjoining graveyard, would not outweigh the harm. In our view, this allocation is clearly unsound. This is remedied by **MM141** which deletes the allocation and its supporting policy.

Land to east of Station Road, Reedham (GNLP1001)

272. This site adjoins existing housing on 3 sides and has only limited visibility from Station Road. It is near to a train station and is accessible to other services and facilities in the village. Whilst walking routes to the primary school would be along roads with no dedicated footway, these are mostly quiet residential streets with limited traffic. The site is not subject to any over-riding constraints and is appropriate to allocate for housing development. However, a modification is required to delete part 2 of the policy, which is repetitive of part 5. It is also necessary to delete unduly prescriptive design requirements, which do not appear to acknowledge the adjoining new build estate to the west. These matters are remedied in **MM142**. Separately, the policy wording already requires that development address the proximity of the site to the Broads, and so a further specific reference to its dark skies is unnecessary.

Mill Road, Reedham (GNLP3003)

273. Policy GNLP3003 states that vehicular access to this site should be via a route onto Mill Road. However, during the hearings it emerged that areas of the front gardens on either side of this route would be required to provide adequate visibility splays. In this regard, no agreement has been reached with either landowner and one has refused to engage in discussions. Other potential access solutions would unacceptably narrow Mill Road and are opposed by the Highway Authority. Any potential route via Holly Farm Road would also be highly constrained given its narrow width, poor visibility at the junction with Mill Road, and conflict with the pedestrian access to the school. There are no obvious design solutions that could overcome these constraints. Moreover, any pedestrian route adjacent to the railway bridge parapet would have very poor visibility to oncoming traffic over the bridge. Accordingly, a safe and suitable access to this site is not achievable and it is therefore not a sound allocation for development. This is remedied by **MM143** which deletes the allocation and its supporting policy.

Land adjoining Norwich Road, Salhouse (GNLP0188)

274. This is a small site on the edge of Salhouse that is well-related to the existing village and its facilities. The site is not subject to any flood risk constraints and the Lead Local Flood Authority did not object to its allocation. Whilst the development of the site would result in the loss of open views from the properties opposite, a change of view from a private window is not in itself regarded as a planning consideration. There are no over-riding constraints that would prevent the development of the site, and it is appropriate to allocate for housing development. The site lies some distance from the conservation area boundary and it does not need to be referenced in the policy. However,

modifications to the policy wording are necessary for clarity and to remove unduly prescriptive design stipulations, which are addressed in **MM144**.

Land north of Chamery Hall Lane and rear of Burlingham Road/St Marys Close, South Walsham (SWA1 and GNLP0382)

275. Site SWA1 was previously allocated for development in the Broadland Site Allocations DPD (2016) and site GNLP0382 is proposed as an extension to it. Together, these adjoining sites effectively form a single allocation, and they are in the same ownership. The Highway Authority objects to any access from Chamery Hall Lane, and the availability of appropriate visibility splays is uncertain in this regard. There is also an existing layby and field access immediately to the west which is likely to impair visibility from any such access. In these circumstances, the policy requirement that access be taken from Burlingham Road is justified.

276. It is confusing for these adjoining sites to have separate policies. Accordingly, **MM145** and **MM146** delete Policies GNLP0382 and SWA1 and combine these sites to form a single allocation. This is subject to a new policy with modified wording which clarifies that compensatory provision for the loss of recreational space is required, and to address the soundness issues identified above. This is set out in **MM147**.

Employment Allocations

Land known as 'Site 4', Norwich Airport (GNLP1061R)

277. This is a large site within the operational boundary of Norwich International Airport. It is identified as a strategic allocation to provide aviation related uses, and given its size and location, it is appropriate to allocate for that purpose. However, modifications to the policy wording are necessary for effectiveness to correct the site area, to clarify the uses that will be permitted, and to allow a proportion of non-aviation uses consistent with a recent planning permission and the Norwich Airport Masterplan. A modification requiring a design concept masterplan to be submitted is also necessary to ensure that the site is appropriately planned, landscaped, and appropriate infrastructure provided. Further modifications are required to ensure that the site is accessible by modes of transport other than the private car, and to address other soundness issues. These are addressed in **MM33**.

Land at The Neatmarket, Hall Road (R1)

278. This brownfield site was previously allocated for development in the Norwich Site Allocations and Site Specific Policies Local Plan (2014). It is located within

an established employment area and is appropriate to re-allocate for this purpose. However, part of the site has now been developed for a car showroom, and a modification to the site area is necessary to reflect this. Further modifications to the policy wording are also necessary to clarify that contributions will be required for offsite pedestrian improvements, and to address the soundness issues identified above. These are addressed in **MM52**.

Land at Holt Road, Norwich (R30)

279. The site is located between the edge of an existing commercial area and the A140. It benefits from planning permission for employment development and is appropriate to allocate for those purposes. However, modifications to the policy wording are necessary to clarify the relationship of any development to airport safeguarding measures and to address other soundness issues. These are addressed in **MM62**. Whilst the representation received at MM stage is noted, the site boundary has not been modified during the course of this examination.

Land adjacent to Norwich Research Park, Colney (Policy COL1/ GNLP0331BR & GNLP0331CR)

280. Site COL1 was previously allocated for development in the South Norfolk Site Specific Allocations & Policies Document (2015), whereas sites GNLP0331BR and GNLP0331CR are proposed as extensions to it. Together, these adjoining sites effectively form a single allocation. Much of the site has planning permission, and part of the COL1 site has been developed out. The site is clearly appropriate to allocate for employment purposes. However, it is confusing for these adjoining sites to have separate policies. Accordingly, **MM67**, **MM68**, and **MM69** delete Policies COL1, GNLP0331BR and GNLP0331CR respectively and these sites are combined to form a single allocation. This is subject to a new policy with modified wording to clarify the requirements in relation to highways and master planning, which are necessary given that much of the site already has outline planning permission to which an illustrative masterplan was attached. The new policy is set out at **MM70**.

Land rear/east of Institute of Food Research, Colney (COL2/GNLP0140C)

281. This is a relatively large site on the edge of an existing commercial area, that was allocated for employment development in the South Norfolk Site Specific Allocations & Policies Document (2015). It is suitable to allocate for those purposes, subject to modifications to the policy wording which are necessary to resolve the soundness issues identified above. These are addressed in **MM71**.

Longwater Employment Area, Costessey (Policy COS3/GNLPSL2008)

282. These sites comprise areas of undeveloped or under-utilised land in the Longwater Employment Area that were previously allocated for development in the South Norfolk Site Specific Allocations & Policies Document (2015). They are located within an established commercial area and are appropriate to allocate for this purpose. However, the site boundaries and site areas need to be modified to remove areas that have been developed out and to reflect other changes since the sites were last allocated. Further modifications to the policy wording are also necessary to clarify which uses will be permitted, and to resolve the soundness issues identified above. These are addressed in **MM74**.

Land west of Ipswich Road, Keswick (KES 2/GNLP0497)

283. This site was previously allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and planning permission has since been granted for employment development. The site is clearly appropriate to allocate for this purpose. However, modifications to the policy wording are necessary for clarity and to address the soundness issues identified above. These are remedied in **MM79**.

South of Hethel Industrial Estate, Bracon Ash (GNLP 2109)

284. This site is positioned between existing built development and is adjacent to a much larger employment allocation (Ref HETHEL 2) to the west. The site is not subject to any over-riding constraints and is suitable to allocate for employment purposes. However, modifications to the policy wording are necessary to remove reference to the need to provide a masterplan as this is not justified for a site of this size, and to address the soundness issues identified above. This is remedied in **MM99**.

Land north of Spirketts Lane, Harleston (HAR 6)

285. The site was previously allocated for employment purposes in the South Norfolk Site Specific Allocations & Policies Document (2015). Much of the site has been granted planning permission and has now been built out and only a small area remains undeveloped. The site is appropriate to allocate for employment purposes, subject to modifications to the policy wording which are necessary to clarify that only around 0.22 ha of land remains available, and to address the soundness issues identified above. These are addressed in **MM97**.

Land south of Spirketts Lane, Harleston (HAR 7)

286. The site comprises open land between the A143 and an established industrial estate. It was previously allocated for employment development in the South Norfolk Site Specific Allocations & Policies Document (2015), and it remains appropriate to allocate for this purpose. However, modifications to the policy wording are necessary for clarity, to correct factual errors, and to clarify that replacement planting will be required for the loss of any trees that are removed to facilitate access. These are addressed in **MM98**.

Land South and South West of Lotus Cars, Hethel (HETHEL 2)

287. This site is a strategic allocation that adjoins existing advanced engineering premises to both the north and south, including the head office of Lotus Cars. The site provides an opportunity to accommodate advanced engineering and technology-based businesses. It was previously allocated for development in the South Norfolk Site Specific Allocations & Policies Document (2015) and is being actively promoted for development. It remains appropriate to allocate for employment purposes, subject to modifications to the policy wording that are necessary to clarify when the site masterplan is required, and to address the soundness issues identified above. These are remedied in **MM100**.

Land at the former station yard, west of B1140, Acle (ACL3)

288. The site comprises an under-utilised piece of land adjacent to a railway line. It was allocated for employment development in the Broadland Site Allocations DPD (2016) and is appropriate to allocate for this purpose, subject to modifications to the policy wording. These are necessary to delete ineffective requirements that are purely descriptive, and to clarify the circumstances where non-B2 uses will be considered. These are addressed in **MM105**.

Land adjacent to Hingham Industrial Estate at Ironside Way, Hingham (HIN2)

289. The site consists of open land on the edge of Hingham Industrial Estate that is visually well contained by an existing band of trees. It was previously allocated in the South Norfolk Site Specific Allocations & Policies Document (2015). The site is available and is not subject to any over-riding constraint. It is appropriate to allocate for employment purposes, subject to modifications to the policy wording that are necessary to clarify the highways requirements, and to specify that development should avoid areas at risk of surface water flooding (which affects only a very small proportion of the site). These are addressed in **MM114**.

Land adjacent to Loddon Industrial Estate, Little Money Road, Loddon (LOD 3)

290. This site was previously allocated in the South Norfolk Site Specific Allocations & Policies Document (2015) and planning permission has since been granted for employment development. The site is appropriate to allocate for this purpose, subject to modifications to the policy wording which are necessary to address the soundness issues identified above. These are set out in **MM117**.

Ex MOD site, Pine Loke, Poringland (POR3)

291. The site comprises mostly open land to the rear of properties fronting Poringland Road. Two large metal lattice towers are positioned next to the site, and it is adjacent to an equestrian use. It was previously allocated for employment development in the South Norfolk Site Specific Allocations & Policies Document (2015), and it remains appropriate to allocate for that purpose. Given the proximity of sensitive uses, a policy criterion restricting the site to Class E(g) uses only is justified. However, modifications to the policy wording are necessary to address the soundness issues identified above, and these are set out in **MM118**.

Land at Old Railway Yard, Station Road, Foulsham (FOU2)

292. This is a brownfield site close to the edge of Foulsham that was previously allocated for employment development in the Broadland Site Allocations DPD (2016). The site is not subject to any overriding constraint, and is appropriate to allocate for employment purposes, subject to modifications to the policy wording that are necessary for clarity, to address the soundness issues identified above, and to remove an unnecessary criterion that is purely descriptive. These are addressed in **MM130**.

Land east of the A140 and north of Norwich International Airport, Horsham St Faith (HNF2/GNLP0466R)

293. This site is a large strategic allocation in close proximity to the A1270. It was previously allocated in the Broadland Site Allocations DPD (2016), and now benefits from planning permission for employment development. The site is appropriate to allocate for employment purposes, although modifications to the policy wording are necessary to adjust the site area so that it reflects the planning permission boundary and the position of the A1270. A modification specifying that no more than 50% of total floorspace should be within Class E(g)(i), rather than in any one use class, is also necessary as this requirement is intended to limit traffic generation associated with office development only. Further modifications are also necessary to clarify the highway requirements and to ensure that the site masterplan is provided with or in advance of the first application. These are addressed in **MM137**.

Land at Abbey Farm Commercial, Horsham St Faith (SL2007/GNLP4061/HNF3)

294. The site comprises open land to the north and west of the existing commercial park. Part of the site was allocated for employment development in the Broadland Site Allocations DPD (2016), although part of the site represents an extension to the original allocation. The site benefits from a recent planning permission and is suitable to allocate for employment purposes. However, modifications to the policy wording are necessary to reflect the amended site area, clarify the highways requirements, and for effectiveness. These are addressed in **MM138**.

Brooke Industrial Estate, Brooke (BKE3)

295. This site is an existing industrial estate that was allocated for development in the South Norfolk Site Specific Allocations & Policies Document (2015). It is now mostly developed out and occupied by existing businesses, although there are still areas of undeveloped and under-utilised land. The site remains appropriate to allocate for employment purposes, however, modifications to the supporting text are necessary to clarify that only around 1.2 ha of land remains available, and for clarity in relation to flood risk. These are addressed in **MM148**.

Land at Dunkirk Industrial Estate (west), south of Banningham Road, Aylsham (AYL3)

296. This is an open piece of land within an established industrial estate, that was previously allocated for employment development in the Broadland Site Allocations DPD (2016). It is appropriate for re-allocation for this purpose without modification.

Land at Dunkirk Industrial Estate (east), south of Banningham Road, Aylsham (AYL4)

297. This site was previously allocated in the Broadland Site Allocations DPD (2016) and now benefits from planning permission for employment development, part of which has since been built out. It is appropriate to allocate for these purposes without modification.

Other Site Allocations and Site-specific Policies

Bawburgh and Colney Lakes (BAW2)

298. This site was allocated in the South Norfolk Site Specific Allocations & Policies Document (2015). The principle of the use has therefore previously been established. From the evidence presented to the examination, little progress has

been made in bringing this site forward as a country park and it is currently leased as a fishing lake. Nevertheless, the Partnership is keen to progress the site and there is a reasonable prospect that it could come forward within the Plan period, providing a valuable countryside and recreational resource for existing and future residents, as well as visitors. The allocation is sound in principle subject to modifications to the policy wording for effectiveness. **MM73** makes these changes.

Redevelopment of existing uses within the Costessey Longwater Development Boundary (COS 4)

299. The Longwater Employment Area encompasses a large commercial area that contains retail and employment uses, car showrooms, and other uses. A policy for this area is clearly necessary to control the uses that are permitted. However, modifications to the policy wording are required to clarify the criteria that would apply to the proposed loss of employment or complimentary sui generis uses, including the proposed marketing requirements. A further modification is also necessary to state that B2 and B8 uses will be permitted, which was omitted in error in the submitted version of the Plan. These matters are addressed in **MM75**.

Royal Norfolk Showground, Costessey (COS5/GNLP2074)

300. The Royal Norfolk Showground is a major visitor attraction and events location within Greater Norwich. Policy COS5/GNLP2074 recognises this and sets out criteria for development within the Showground area. Whilst the policy is clearly necessary, modifications to its wording are necessary to remove inconsistencies, and to clarify the highway requirements and the level of locally produced goods in any anchor food retail unit. These are remedied in **MM77**.

Land northeast of Reepham Road Hellesdon (HEL4/GNLP1019)

301. This is an area of land allocated for recreational open space in the Broadland Site Allocations DPD (2016). The Plan proposes to continue with this allocation. However, the landowner objects and states that the site is not available for the use proposed. There is no convincing evidence that the site can be brought forward for the proposed use in the Plan period. Therefore, despite being previously allocated, the allocation in this Plan is not justified and should be deleted. **MM84** deletes the allocation.

Redevelopment of existing hospital and science park uses within the Colney Development Boundary (COL 3)

302. This policy encompasses the wider employment area, hospital, and science park at Colney. It is a policy that featured in the previous South Norfolk Site Specific Allocations & Policies Document (2015), and it remains necessary to guide development in this area.

Restriction of employment uses at Hethel (HETHEL 1)

303. This policy area incorporates a cluster of advanced engineering and technology-based businesses, including the head office of Lotus Cars and the Hethel Engineering Centre. The policy is necessary in order to protect and encourage the growth of this important cluster of businesses.

Land west of Poppyfields, Hethersett (HET 3)

304. This is an existing allocation for open space in the South Norfolk Site Specific Allocations & Policies Document (2015). Given the development of the strategic allocation to the north of Hethersett, this site's value as open space for the local community will become greater. Its use as informal open space will also help to protect the archaeological interest on the land. The allocation is sound without modification.

Land north of Berryfields, Brundall (BRU2)

305. This site was allocated in the Broadland Site Allocations DPD (2016). However, planning permission has subsequently been granted for housing which has now been built on the site. The allocation therefore cannot be delivered and is not justified. **MM108** deletes the allocation and policy.

Land east of the Memorial Hall, Brundall (BRU3)

306. This site was allocated in the Broadland Site Allocations DPD (2016). However, planning permission has subsequently been granted for housing on this site and the allocation is therefore not justified. **MM109** deletes the allocation and policy.

Costessey Contingency Site (GNLP0581/2043)

307. This site lies on the western edge of Norwich. It is a large site of around 62 hectares. The policy provides for it to come forward as a contingency site for an urban extension including around 800 homes, open space, a local centre and education facilities. The policy sets out a trigger mechanism whereby it could

come forward. This is based on three consecutive years of completions being more than 15% below target and then a second test that the under-delivery of committed and allocated sites is a result of site-specific constraints.

308. The Framework requires planning authorities to review plans within five years following adoption. It is likely that three consecutive Annual Monitoring Reports would not be available until into mid 2026 at the earliest. If there was significant under delivery of housing, the local planning authorities would have to consider the issue as part of the review of the local plan. The second part of the proposed trigger mechanism would require evidence that the under-delivery was as a result of site-specific constraints.
309. It is not clear to us how this would work effectively and the processes and approval mechanisms which would have to be followed to confirm the contingency site could come forward. There would then need to be a planning application submitted and it would be likely to be a further few years before the site was delivering homes. At the hearings the Partnership considered it not unreasonable to assume a further two years beyond the three AMR years, before houses could be delivered. The Partnership acknowledged that, as a result, there could be five years of persistent under delivery before a house was built at the contingency site. The Partnership also indicated at the hearings that it had not done any analysis as to whether the Costessey site would actually make any material difference to an overall under delivery position. We are therefore not convinced that the trigger mechanism in the submitted Plan would actually address the issues which it is designed to resolve.
310. We have considered the alternative trigger mechanism wording set out by the site promoter in its hearing statement and in its responses to the modification consultation. We do not agree that such wording either could make the Policy effective or justified. Although this Plan is being examined under the September 2023 version of the Framework, planning decisions post adoption would be made having regard to the advice in the revised Framework. The requirement to identify and update annually a supply of specific deliverable sites to provide a minimum of five years worth of housing sites would not apply for five years post adoption. The Housing Delivery Test would also not be a consideration for the local planning authority. We do not consider that it is justified to apply a different approach solely in the case of the contingency site.
311. Furthermore, we do not agree that the delay to progress on site delivery in the Plan area as a result of nutrient neutrality issues provides a justification for this policy. In this regard, we have carefully considered the impact of nutrient neutrality on affected sites in our assessment of land supply and the trajectory, and, through a new positively worded policy in the Plan for those sites yet to come forward.

312. We also do not agree that the case for a new sixth form college provides a justification for a contingency site allocation. If a school is needed to meet growth arising from housing sites in the Plan, then provision should be made on a site with certainty, not on a site which may only be delivered should completions on housing sites in the Plan area not progress as planned. That would leave the provision of the sixth form college reliant on other housing sites failing to deliver and that cannot be a sound basis for planning.
313. The Partnership told us at the hearings that the sixth form facility was not required to meet growth needs arising from the Plan. The site promoter takes a different view. However, the evidence before us is not convincing and it seems that there is a lack of co-ordinated planning between the education authority, the local planning authority and the site owner on this matter.
314. We conclude elsewhere in this report that there is a buffer of around 11% across the whole of the Plan area. We consider that this is sufficient to mitigate any slower than expected delivery on some sites and to provide flexibility in the market. We have arrived at that conclusion through a thorough and detailed assessment of each allocation and some of the larger commitments. It is also possible that there would be other options open to the Partnership to help address under-delivery which could be considered as part of a plan review or through decisions on planning applications.
315. For the reasons set out above, we consider that there is no convincing case for the site to be allocated as a contingency site, or as the site promoter seeks, a full allocation. The Policy is not justified and not effective and it is necessary to delete it.
316. **MM76 and MM149** are therefore necessary for the Plan to be effective and justified.

Gypsy & Traveller Allocations

Land off Buxton Road, Eastgate, Cawston (Ref GNLP5004R)

317. The site consists of an area of land on the northern side of Buxton Road, within the hamlet of Eastgate. It is located within a cluster of dwellings and is partially screened in longer views by mature trees and planting. Whilst the site was originally proposed for 4 pitches, that assumes an unrealistically high density for a site of this size. In this regard, it is likely to accommodate up to 2 pitches. The proposed access would be some distance from the bend in the road to the west, and sufficient space would be available to accommodate vehicle parking within the site. Accordingly, the allocation would not raise any highway safety issues, and the Highway Authority has not objected to the allocation on these grounds.

Moreover, the site would have reasonable access to services and facilities in Cawston, which is around 1 km away.

318. This site is appropriate to allocate for Gypsy and Traveller accommodation. **MM150** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land at the Oaks, Reepham Road, Foulsham (GNLP5022)

319. This site comprises an extension to the rear of an established Gypsy and Traveller site fronting onto Reepham Road. The proposed extension would have limited visibility in the surrounding area, and the site-specific policy requires that further landscaping and tree planting be undertaken. This would ensure that any impact on the landscape would be limited. Whilst the site is in a rural location, it has reasonable access to services and facilities in Foulsham, which is around 2 km away. Part of the site is subject to surface water flood risk, however, the site-specific policy wording requires that development in this area be avoided. In this regard, there is scope to accommodate 5 additional pitches without developing this area. In addition, the proposed extension of the site would not be of a scale that would dominate the nearest settled community.

320. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM151** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Brick Kiln Road Hevingham (Ref GNLP5027)

321. This site comprises an extension to the rear of an existing Gypsy and Traveller site. It is set back from the road and has limited visibility in the surrounding area. A small part of the site is subject to surface water flood risk, however, the site-specific policy requires that development in this area be avoided. In this regard, there is scope to accommodate 5 additional pitches without developing this area. The site would take access from a relatively straight section of Brick Kiln Lane and would generate only a modest amount of traffic. Moreover, the Highway Authority has also not objected to the allocation on safety grounds. In addition, the number of pitches proposed would not be of a scale that would dominate the nearest settled community.

322. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM152** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land north of Shortthorn Road, Stratton Strawless (GNLP5019)

323. This site comprises an extension to an established Gypsy and Traveller site on Shortthorn Road that would comprise 4 additional pitches. It would not be prominent when viewed from the road and would be seen in the context of the existing Gypsy and Traveller site and other neighbouring development. Whilst the site is adjacent to mature trees and grassland, this has not prevented the development and expansion of the adjoining site. It is around 2 miles from services and facilities in Horsford, which would provide a reasonable level of accessibility. The site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM153** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Romany Meadow, The Turnpike, Carleton Rode (GNLP5020)

324. This site comprises an extension of 6 pitches to an established Gypsy and Traveller site on The Turnpike. It is in a relatively prominent position next to the B1113, although mature trees and planting along its frontage partially screen the site from the road. The site-specific policy requires that further landscaping and tree planting be provided, and this would ensure that its visual impact would be minimised. Any residual views of the site from the north east would also be seen against the backdrop of the existing site. Whilst the site is in a rural location, it has reasonable accessibility to services and facilities in nearby villages. The scale of the allocation is proportionate to the existing site and its surroundings, and it would not dominate the nearest settled community, either alone or in combination with other sites. Part of the site is subject to surface water flood risk, however, the site-specific policy wording requires that areas subject to flood risk be avoided.

325. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM154** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land off Upgate Street, Carleton Rode (GNLP5024)

326. This is an existing under-utilised Gypsy and Traveller site, which contains 2 pitches at present. Given its size, there is scope to increase this number to 6 within the existing site boundary. The site is surrounded by mature hedgerows which screen it within the surrounding area, and the impact on the landscape would therefore be limited. Whilst the site is in a rural location, it has reasonable accessibility to services and facilities in nearby villages, including a primary school. There is no indication that the existing point of access has led to any highway safety issues, and the Highway Authority do not object to the

allocation. The scale of the site is such that it would not dominate the nearest settled community, either alone or in combination with other sites.

327. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM155** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land east of Station Lane, Ketteringham (GNLP5013)

328. This site is owned by South Norfolk Council and is currently used as a depot for refuse collection vehicles. It is a brownfield site with reasonable access to services and facilities in Hethersett. The Council is seeking to relocate the depot and the site will become available in the medium term. It is appropriate to allocate for Gypsy and Traveller accommodation for around 10 pitches, and based on the available evidence, is likely to come forward in the timescales envisaged. **MM156** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land at Strayground Lane, Wymondham (Ref GNLP5028 A & B)

329. This site consists of 2 parts - a cleared area of land to the south and a smaller recycling centre to the north. The recycling centre is due to be relocated to an alternative site in 2025, and the larger cleared area has been promoted as an allocation by the landowner. Both would be accessed via Strayground Lane, which is a narrow single-track road that leads onto Whartons Lane, and the junction with the B1172. Whilst this is a narrow route, the proposed Gypsy and Traveller allocation would generate significantly less traffic than the existing recycling centre. Evidence has also been submitted to show how existing passing places could be improved. Moreover, no collisions have been recorded at the junction between Whartons Lane and the B1172 in the last 5 years.
330. In these circumstances, we consider that access matters are capable of being dealt with at the planning application stage. The Partnership and site promoter will need to work with the Highway Authority to agree the necessary highway improvements consistent with the requirements of the policy. On the basis of the evidence before us, including the position of the Partnership who have proposed this site following consultation, we consider that the principle of the allocation is justified.
331. Given the reduction in traffic that would occur compared to the existing use, the allocation would not result in any harm to the attractiveness of Strayground Lane as a walking route. The site-specific policy also requires that boundary landscaping is installed which would enhance this route compared to the

existing situation. In terms of the proximity of the level crossing to the south, Network Rail have raised no objection to the allocation on this ground. Any pollution or ecological implications of the allocation are also capable of being dealt with at planning application stage.

332. This site is appropriate to allocate for Gypsy and Traveller accommodation. **MM157** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

333. In terms of delivery timescales, most of the site is currently disused, and the site promoter stated that they are in discussions with a provider. Whilst the recycling centre would need to be relocated to free up the smaller element, that is only likely to accommodate a single pitch. In light of the above, there is a realistic prospect that development will be delivered on the site within 5 years.

Conclusion

334. Subject to the abovementioned MMs, the site allocations are consistent with the Spatial Strategy and the evidence, are justified and effective, and can be delivered in the timescales envisaged.

Issue 8 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy?

Overall Housing Supply

335. The Plan as submitted identified a total housing supply of 49,492 new homes, which provided a buffer of around 22% above the housing requirement. This supply included completions, commitments, windfalls, Plan allocations, and a contribution from the emerging SNVCHAP. As set out in this report under Issue 1, we consider that the overall housing supply is less than this at around 45,041 during the Plan period, which nonetheless provides for a significant buffer of around 11% above the housing requirement. This buffer will provide choice, flexibility, and mitigation against any under or non-delivery of housing sites within the Plan area. In addition, and as set out below, the assumed windfall allowance is very cautious and in practice is likely to be significantly exceeded.

336. During the examination, the Partnership updated its housing supply evidence to a base date of 31 March 2022. The submission of the updated evidence was at our request to ensure that the examination was based on the most up to date evidence. This provides an additional two years of housing completion data from that which is set out in the Plan. In total, it shows that there were 8,728

completions between 2018/19 and 2021/22. Updating the housing supply to 31 March 2022 has also led to an increase in extant planning permissions, from 31,452 to 34,688 dwellings. The updated supply evidence also takes account of errors and omissions and some updated information on site delivery.

337. The updated housing supply evidence also makes a change to the ratio at which student accommodation counts towards housing completions. This change now brings the ratio in line with the PPG. We consider this approach to be justified. Similarly, the proposed change in respect of how specialist older persons accommodation is converted into a housing figure is also justified.
338. As set out under Issue 7, some of the proposed housing allocations are not justified and the Plan has been modified in order to delete these sites. It is necessary to amend the housing trajectory to reflect this.
339. We have also altered certain assumptions regarding start dates, lead in times, and delivery rates on other allocations in the Plan. These assumptions are based on the evidence before us at the examination, including hearing statements, statements of common ground, industry research such as 'Start to Finish', our site visits, and answers given at the relevant hearing session. For example, the Partnership put forward updated expected delivery information for Sprowston (Ref GNLP0132) which led to a reduction in its contribution in the Plan period of 660 homes. For the larger strategic allocations such as the ENSRA, these assumptions are set out elsewhere in this report.
340. As set out above, nutrient neutrality emerged as a major issue during the examination following the receipt of a letter from Natural England in March 2022. It affects most of the Plan area, including the entirety of the Norwich urban area and the main towns of Wymondham and Aylsham, and initially led to a hiatus in the granting of planning permission for new housing. Significant work has been done on this, including the formation of a Joint Venture Company with other affected Norfolk Councils to create a trading platform for nutrient mitigation credits. It has also sought to retrofit existing Council-owned properties with water saving appliances, which has provided sufficient mitigation to allow for the development of Anglia Square to proceed. Many larger housing developments will also be capable of providing their own nutrient mitigation, as is proposed at several of the sites that are currently allocated in Area Action Plans. The Partnership has updated its Trajectory to reflect the impact of nutrient neutrality issues and based on the evidence before us and the answers given at the relevant hearing sessions, we consider this to be robust.
341. In terms of the assumed windfall allowance, this is based on an assessment of past windfall completions between 2008/09 and 2017/18 on sites of less than 10 dwellings in Broadland and South Norfolk, and on all such sites in Norwich. The gross annual rate of windfall completions was then heavily discounted in order

to produce the assumed windfall contribution. The size of this discount is such that it presents a very cautious view of future windfall delivery. In addition, an analysis has been undertaken of the types of sites that have come forward over the trend period, including conversions, sub-divisions, affordable housing exception sites, etc, which shows that such sites have come forward reliably. These sites are not generally picked up in the HELAA, which only considers land of 0.25 ha or above. Moreover, the recent expansion of permitted development rights to convert existing buildings to housing is likely to increase the rate at which windfalls come forward in the years ahead.

342. The assumed delivery from windfalls sites has been reduced compared to that set out in the submitted version of the Plan. This is due, firstly, to an assumption that no windfalls will be delivered in 2023/24 and 2024/25 due to nutrient neutrality issues, and secondly, to the updating of the housing supply to 31 March 2022, which means there are now fewer years remaining in the Plan period. We consider both of these adjustments to be robust. In these circumstances, we consider that compelling evidence has been presented that windfalls will provide a reliable source of supply over the Plan period.
343. Policy 7.5 has been modified so that it now relates solely to self and custom build housing. In this regard, there is a clear demand for this type of housing (discussed under Issue 6) and this policy will open up new development opportunities that were not previously available. In these circumstances, a contribution of 800 dwellings from this source is justified. Moreover, as the sites permitted under Policy 7.5 will be on land where housing has previously been restricted, any overlap with the assumed windfall contribution will be minimal.
344. In addition, we consider the 1200 dwellings assumed on sites to be identified in the SNVCHAP to be reasonable over the period of this Plan. Those sites are to be allocated separately in that document.
345. With regard to the larger sites with planning permission, and those allocated in Area Action Plans, we have made some alterations to the supply and delivery assumptions in addition to those proposed by the Partnership at the hearings. In particular, we have discounted any contribution from the Norwich RFU site (allocated in the Growth Triangle AAP - Ref GT13) as there is little evidence to indicate that it is still available or that a relocation site for the Club has been secured. This reduces the supply by 250 homes. In addition, the Partnership acknowledged that delivery at the North Rackheath site (Ref GT16) will be reduced by 180 dwellings due to a dampening effect caused by concurrent development of nearby site GNLP0172 by the same developer. However, based on the submitted evidence and discussions at the hearings, we consider that the delivery assumptions for the sites at Beeston Park, Land at Brook Farm & Laurel Farm, and Long Stratton, to be robust.

346. As a consequence of the above, the housing trajectory set out in Appendix 6 of the Plan needs to be amended for it to be justified and effective. Appendix 6 is therefore replaced by Appendix 4 in **MM20**.

Five Year Supply

347. The expected adoption date of the Plan means that the relevant 5 year period is 1 April 2023 to 31 March 2028. This is the most up to date housing supply information before the examination and therefore accords with the PPG that strategic policies should identify a five year supply from the date of adoption.

348. We have taken the updated evidence presented to us in the Partnership's March 2023 hearing statement which was based on September 2022 published housing supply data and which informed the hearing sessions. We have assessed each of the sites against the tests in the Framework and PPG in respect of whether they are deliverable or developable, based upon the evidence presented to us at the examination. We have also considered the impact of nutrient neutrality on the deliverability of sites in the period 1 April 2023 - 31 March 2028, as is set out in relation to the overall supply. We have also taken into account the progress made towards identifying mitigation solutions in considering the 5 year supply position.

349. We recognise that the evidence on which we rely to examine the 5 year supply position is data from September 2022 discussed and tested at the hearing session in March 2023. It is possible that circumstances on some sites may have altered since then. However, this is the most practical up to date evidence before us across the whole portfolio of sites to reach a conclusion on 5 year supply. To wait for further evidence would significantly delay the end of the examination and the adoption of the Plan. Other evidence could become out of date. There has to be a cut off, and a reliance made upon the most up to date evidence practically available to the examination. This is that position.

350. In most cases we agree with the Partnership's view on deliverability, but on some sites, we consider that the evidence does not support the site contributing to the 5 year supply. We have made reference to this in some of the site specific matters set out in Issue 7. For example, we do not consider that the 5 year supply contribution from the ENSRA is as great as the Partnership proposed.

351. In submitting the Plan, the Partnership has asked us to confirm the five year supply position. We have not been provided with evidence that the Partnership explicitly made it clear at the Regulation 19 stage that it was seeking to confirm the existence of a 5 year supply through the plan-making process as set out in the PPG. However, this was clearly set out in the submission letter and concerns in this regard were not raised by participants at the hearing sessions. The PPG is guidance, but in any event, it is clear that the Partnership has engaged positively with developers and others in assessing housing delivery

and this includes the many statements of common ground agreed on a significant number of allocations and commitments. Furthermore, those with an interest in housing delivery were able to submit statements and take part in the hearing sessions on housing supply at the examination, including to consider our specific questions on 5 year supply.

352. In accordance with the Framework, in this position, a buffer of 10% should be added. There is no need to add a further buffer. The 5 year housing requirement is 9,950 homes from 1 April 2023 to 31 March 2028. A 10% buffer takes this requirement to 10,945 homes.

353. Taking into account all of the evidence before us, we consider that the 5 years supply for the Plan area is 12,632 homes, which is a supply of 5.77 years. This is lower than the 6.05 years supply which the Partnership considered it would have. The summary table setting out the 5 year supply position is set out in the replacement Housing Trajectory annex which **MM20** addresses.

Supply of Gypsy and Traveller Sites

354. The need for 52 Gypsy and Traveller pitches set out in the GTAA is disaggregated as follows: 30 in years 1-5, 10 in years 6-10, and 12 in years 11-16 of the Plan. Sites that are capable of accommodating 38 pitches have been identified to meet the 5 year requirement. In this regard, Joint Delivery Statements have been agreed with the landowners for each of the proposed Gypsy and Traveller allocations that support the Partnership's delivery assumptions. Based on these, the other submitted evidence, and the discussions that took place at the hearings, we are satisfied that these sites are deliverable. The Plan will therefore be able to demonstrate a 5 year supply of Gypsy and Traveller pitches upon adoption.

355. Beyond the 5 year period, the Council-owned Ketteringham Depot is allocated as a site that will become available in the medium term. This timescale is to allow for the depot to be relocated and is supported by a Joint Delivery Statement agreed with the landowner. In our view this is a developable site. In terms of the windfall allowance that is proposed, this is supported by historic rates of windfall delivery that show a consistent pattern of unanticipated sites coming forward. The proposed criteria-based approach in Policy 5 would also allow windfall sites to continue to come forward in the future. Windfalls are only assumed to contribute to the later years of the Plan period and at a rate of 1-2 per year. This is a cautious approach, and we are satisfied that compelling evidence exists that windfalls will continue to provide a reliable source of supply.

356. Including the windfall allowance, the Plan identifies a total supply of 60 pitches to meet the requirement, which includes a modest buffer to allow for choice and

under-delivery at any of the allocated sites. This approach is positively prepared, justified, likely to be effective, and consistent with national policy.

Conclusion

357. On the basis of the evidence before us, and subject to modifications, the Plan sets out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy. The Plan, with modifications, provides both a plan period and five-year supply of housing sites.

Issue 9 – Will the Monitoring Framework provide a sound and effective basis for monitoring of the Plan?

358. The Monitoring Framework in the submitted plan is based on themes and indicators. However, to be effective it needs to set out targets, triggers, and actions. **MM19** replaces the Monitoring Framework in the submitted Plan with the revised version which we consider provides a sound and effective basis for monitoring the Plan.

Overall Conclusion and Recommendation

359. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted in accordance with Section 20 (7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

360. The Partnership has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the Greater Norwich Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

361. We conclude that if adopted promptly (with the recommended MMs) the Plan establishes a five-year supply of deliverable housing sites for the Plan area. Accordingly, we recommend that in these circumstances the LPAs will be able to confirm that a five-year housing land supply for the Plan area has been demonstrated in a recently adopted plan in accordance with paragraph 75 and footnote 40 of the Framework.

Mike Worden and Thomas Hatfield

This report is accompanied by Appendices containing the MMs.

Annex 2 – Site Allocations in Norwich

GNLP Reference	Planning Application Reference	Location	Address	Site Size (Ha)	Use	Total Dwellings	Likely delivery
STR.01	12/00875/O (Bracondale Deal Ground)	East Norwich Strategic Regeneration Area (SRA)	Bracondale / King Street, Carrow Works and Carrow House	48.57	Strategic Regeneration Site	3,362 (some homes in this figure will be in South Norfolk)	2025/26 - 2038 and beyond
STR.02	22/00434/F (Approved July 2023)	North City Centre SRA	Anglia Square	4.79	Residential led mixed-use	800	2024/25-2027/28
NCC.14		North City Centre SRA	Duke Street, former EEB site (Dukes' Wharf)	0.83	Mixed-use	100	2029/30-2030/31
NCC.15	18/01552/F	North City Centre SRA	Duke Street, land adjoining Premier Inn and River Wensum	0.12	Residential led mixed use / Student Accommodation	140 bed student accommodation	2028/29
NCC.16		North City Centre SRA	Friars Quay / Colegate, Car Park	0.13	Residential	25	2029/30
NCC.17		North City Centre SRA	Muspole Street, St Georges Works,	0.55	Residential led mixed-use	55	2027/28-2028/29
NCC.20	09/00296/F (17 dwellings)	North City Centre SRA	Land at 140-154 Oak Street and 70-72 Sussex Street	0.27	Residential	27	2028/29 - 2029/30
STR.04	12/00703/O 13/02089/VC 19/00978/MA	Bowthorpe/Costessey Strategic Urban Extension	Three Score, Bowthorpe	25.29	Urban extension	755	2022/23 - 2034/35
NCC.01	18/01286/F	City Centre	Land at Whitefriars	1.61	Residential led mixed-use	220	2024/25-2026/27
NCC.02	15/01927/O	City Centre	Land at Barrack Street	2.17	Residential led mixed-use	200	2034/35-2037/38
NCC.03		City Centre	Rose Lane and Mountergate, land at	1.2	Mixed-use	50	2036/37 - 2037/38
NCC.04		City Centre	Mountergate / Prince of Wales, land at	2.39	Mixed-use	200	2028/29 - 2031/32
NCC.05		City Centre	Thorpe Road: 13-17 Norwich Mail Centre	1.52	Residential led mixed-use	150	2035/36 - 2037/38
NCC.06	11/02104/O, 13/01270/RM, 17/01091/F	City Centre	Kerrison Road, Carrow Quay; land north of (permission), Norwich City Football Club (part) Groundsmans Hut (allocation & permission)	2.23	Mixed-use	323	2022/23 - 2023/24
NCC.07	22/00273/F	City Centre	Argyle Street	0.32	Residential	15	2025/26
NCC.08		City Centre	King Street, King Street Stores	0.21	Residential	20	2031/32
NCC.09		City Centre	King Street, 125-129, 131-133 and Hobrough	0.35	Residential led mixed-use	20	2029/30 - 2030/31

GNLP Reference	Planning Application Reference	Location	Address	Site Size (Ha)	Use	Total Dwellings	Likely delivery
			Lane				
NCC.10		City Centre	Garden Street, land at	1.08	Residential led mixed-use	100	2032/33 - 2036/37
NCC.11		City Centre	Ber Street, 10-14	0.11	Residential	10	2025/26
NCC.12	18/00437/F 19/01405/MA	City Centre	Queens Road and Surrey Street, land east of Sentinel House	0.38	Residential / Student Accommodation	252, bed student accommodation	2024/25
NCC.13		City Centre	Bethel Street, land to rear of City Hall	0.4	Mixed-use	20	2031/32
NCC.18		City Centre	Westwick Street Car Park	0.3	Residential	30	2030/31
NCC.19		City Centre	Duke Street, St Marys Works	1.05	Mixed-use	150	2028/29 - 2030/31
STR.03		Remainder of City	Land known as 'Site 4', Norwich Airport	42.46	Airport related employment and general employment	N/A	No forecasting data available
NOS.01	18/00372/O	Remainder of City	Bowthorpe Road, Norwich Community Hospital Site	5.3	Hospital development / mixed-use	200	2030/31 - 2034/35
NOS.02		Remainder of City	Dereham Road, Site of former Earl of Leicester PH, 238a	0.14	Residential	10	2029/30
NOS.03	06/00166/F (extant)	Remainder of City	Land at Ketts Hill and east of Bishop Bridge Road	1.65	Residential	80	2029/30 - 2033/34
NOS.04		Remainder of City	Gas Hill, Gas Holder	0.3	Residential	15	2030/31
NOS.05		Remainder of City	Thorpe Road, land west of Eastgate House	0.19	Residential	20	2028/29
NOS.06		Remainder of City	City Road, 24, John Youngs Ltd	0.89	Residential	45	2036/37 -2037/38
NOS.07		Remainder of City	Land at The Neatmarket, Hall Road	3.45	Employment	N/A	No forecasting data available
NOS.08	19/00911/F (50 dwellings)	Remainder of City	Bluebell Road, Bartram Mowers site (remainder of allocation)	3.4	Residential	100	2022/23-2027/27
NOS.09		Remainder of City	Land adjoining the Enterprise Centre at Earlham Hall	1.29	University Related uses and employment	N/A	No forecasting data available
NOS.10	15/00121/F 16/00099/MA	Remainder of City	Bluebell Road (UEA, land north of Cow Drive)	0.89	UEA campus-based student accommodation	400 bed student accommodation	2033/34

GNLP Reference	Planning Application Reference	Location	Address	Site Size (Ha)	Use	Total Dwellings	Likely delivery
NOS.11		Remainder of City	Land between Suffolk Walk and Bluebell Road	3.96	University related development	N/A	No forecasting data available
NOS.12		Remainder of City	UEA Grounds Depot	1.6	UEA campus-based student accommodation	400 bed student accommodation	2035/36
NON.01		Remainder of City	Land at Holt Road	1.33	Employment	N/A	No forecasting data available
NON.02		Remainder of City	Hurricane Way	2.28 & 0.26	Light industrial employment and housing	30	2036/37 - 2037/38
NON.03	18/00917/O 19/01031/RM	Remainder of City	Constitution Hill, Constitution Motors	0.27	Residential	12	2025/26
NON.04	19/00971/F 20/01156/VC	Remainder of City	Windmill Road, land north of	0.19	Residential	17	2025/26
NON.05	18/01772/F 20/01624/MA	Remainder of City	Mousehold Lane, Start Rite Factory site	0.86	Residential	121 bed student accommodation	2022/23 - 2024/25
NON.06		Remainder of City	Dibden Road, Van Dal Shoes and car park	0.54	Residential	25	2030/31
NON.07	18/00952/O (19) 18/00271/F (9)	Remainder of City	Starling Road, Industrial sites; remainder of allocation	0.27	Residential	28	2024/25
NON.08		Remainder of City	Waterworks Road, Heigham Water Treatment Works	1.37	Residential led mixed-use	60	2033/34 - 2034/35
NON.09		Remainder of City	Mile Cross Depot	4.4	Residential	170	2024/25 - 2028/29



Committee name: Cabinet

Committee date: 06/03/2024

Report title: Customer and Digital Strategy 2024-2029

Portfolio: Councillor Packer, cabinet member for customers and digital

Report from: Head of customers, IT and digital

Wards: All wards

OPEN PUBLIC ITEM

Purpose

To seek approval from Cabinet for the Customer and Digital Strategy 2024-29.

Recommendation:

It is recommended that Cabinet approves the Customer and Digital Strategy 2024-29.

Policy framework

The council has five current corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report incorporates the ambition of all of the above under a new set of priorities that have emerged following a full and extensive period of consultation with both internal and external stakeholders during the formation of the new Corporate Plan: They are:

- A Prosperous Norwich
- A Fairer Norwich
- A Climate Responsive Norwich
- A Future-Proof Norwich
- An Open and Modern Council

Report details

Background

1. Norwich City Council's vision, as set out in the corporate plan 2024-29 is to become a fair and thriving city, full of ambition. Delivering on key priorities, being an open and modern council and doing the basics well in an efficient, timely and well-informed way is key towards achieving this.
2. The Customer Experience and Digital Strategy 2021-24 focussed on developing modern, agile workforce tools and the building blocks for better data management. The new Customer and Digital Strategy will build on the work delivered to date.
3. Consumer research (customer digital index 2022) suggest that 99% of the UK are now online. In the east of England 89% (UK average 88%) have essential full or partial digital skills for life.¹ We recognise that customers have varying needs, and the council will continue to provide traditional contact options for those that need to access services in a different way. These options include, a telephone service, a face-to-face appointment service and translation assistance.
4. The majority of our customers have access to online and are digitally enabled and they expect our services to be easy to access and available 24/7. Our data shows that there is great opportunity to increase take up by improving their experience of using our services. Increasing the take up of online services will make council services more cost effective, enabling the council to focus resources on those who need them most.

Customer and Digital Strategy (appendix A)

5. The purpose of this document is to inform how the teams across the council are going to collaborate to deliver effective experiences for our customers. It will demonstrate how the council will continue to develop as a digital organisation, providing easy to access services that our customers want to use by default. We will support our workforce to develop modern and innovative ways of working, delivering inclusive, cost effective and efficient services.
6. Within the context of this strategy customers are defined as anyone who lives, works or visits the city council area, councillors and our workforce. Our workforce will be supported to develop modern and innovative ways of working, delivering inclusive, cost effective and efficient services.
7. The council has less funding available to meet demand for services, needs to transform and be efficient. Easy to access, end-to-end digital services, which deliver positive outcomes, are a key enabler in meeting the requirements to deliver effective and efficient continuous service improvements.

¹ The Essential Digital Skills Survey, conducted by Ipsos MORI on behalf of Lloyds Bank, is the UK's benchmark for digital skills. It measures the fundamental tasks needed to access the online world and the essential digital skills needed for life and work. The most recent survey conducted in 2022, suggests that 99% of the UK are now online. In the east of England 89% (UK average 88%) have essential full or partial digital skills for life.

8. The strategy vision is for the council to become a digital organisation, providing easy to access services that our customers want to use by default. To support the workforce to develop modern and innovative ways of working, delivering inclusive, cost effective and efficient services.
9. Three objectives will ensure that the strategy delivers this vision. These objectives are:
 - a) Provide services which are easy to access.
 - b) Develop our approach to best serve our customers expecting a digital service by default.
 - c) Ensure IT and digital solutions are reliable and secure.
10. This is a council-wide strategy and has been informed by a number of different sources:
 - a) the Corporate Plan 2024-29
 - b) EDI Strategy 2024-27
 - c) Norwich 2040 Vision
 - d) outcomes from the Customer Experience and Digital Strategy 2021-24
 - e) performance data
 - f) best practice
 - g) website analysis
 - h) contact analysis
 - i) channel shift data
 - j) focus groups
 - k) equality data obtained from our strategy team

Feedback from:

- a) consultation survey and workshop report
 - b) councillors
 - c) colleagues
 - d) residents
 - e) voluntary and community groups
 - f) business
 - g) IT services survey
 - h) corporate plan consultation
 - i) EDI strategy consultation
 - j) customer user experience/satisfaction feedback
11. Once approved, the strategy will be shared and promoted across the organisation. The strategy will be supported by a strong governance structure and roadmap. The delivery status of our objectives and subsequent themes will be supported by a detailed action plan that will measure and assess against the strategy and outcomes. The outcomes will be measured by a set of indicators that will be considered and developed as part of the new performance framework, that will be developed upon approval of the new Corporate Plan.

Consultation

12. Consultation has been carried out which informs the strategy. This has comprised of a series of workshops which were delivered to colleagues,

councillors and voluntary sector organisations in October and November 2023.

13. A customer survey was published on the Get Talking Norwich Platform from 17 October to 16 November 2023. No creation of account or login was required to access the survey.
14. A key driver behind the delivering the new customer and digital strategy in 2024 was to ensure that the feedback from extensive corporate plan engagement could be fully utilised to inform the strategy. Over 900 individuals and organisations were engaged as part of this process, including Norwich residents and tenants' groups, councillors and officers, voluntary sector and community organisations, and local businesses and business networks.
15. The Customer and Digital Strategy will form part of a suite of strategies which underpin the Corporate Plan. The EDI Strategy has recently been completed and feedback from the strategy consultation (surveys and workshops) has been used to inform the Customer and Digital Strategy.
16. A report has been produced which details the consultation process and how this has informed strategy (appendix B)

Implications

Financial and resources

17. Delivering the strategy and intended outcomes will require significant future revenue and capital investment. Funding for specific proposals will be subject to a separate approval process for inclusion the council's capital and revenue budgets at the appropriate time. Investment will be based on a business cases assessment and detailed review of system and resource requirements. There are no specific proposals in this report that would reduce or increase resources. Delivery of specific solutions will include an assessment of what is required.

Legal

18. If there is to be greater interaction with digital services, the Council will need to consider the impact on any current contractual arrangement, business continuity, security requirements, confidentiality and the collection and storage of data (including considering whether privacy notices need to be refreshed). This will be picked up as part of the action plan.

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	<p>An equality impact assessment has been completed (appendix C)</p> <p>No one group will be disproportionately affected by the delivery of the strategy, including those with protected characteristics.</p> <p>Whilst a key objective of the strategy is to provide digital services by default, this is for those customers who wish to access services in this way.</p> <p>The council will continue to provide traditional contact options for those who want and need to use these options, including a telephone service with an option to request a call back, a face-to-face appointment system or translation assistance. The council website has an accessibility function.</p>
Health, social and economic impact	<p>Positive - improving access to online services and enabling more customers to self-serve.</p> <p>Continue to provide customers with non-digital access to council services.</p> <p>Flexible working has a positive impact for the workforce.</p>
Crime and disorder	Neutral impact
Children and adults safeguarding	Neutral impact
Environmental impact	<p>Positive - providing customer information digitally reduces the need for printing and postage and a digital workforce that has the right tools for a flexible and virtual working helps reduce our carbon footprint.</p>

Risk management

Risk	Consequence	Controls required
<p>Not providing fit for purpose digital solutions.</p> <p>A high volume of in person/telephone contact as digital services are not easy to access.</p> <p>IT solutions are not secure and reliable</p>	<p>Customer expectations will not be met.</p> <p>Administrative burden on the workforce and increased costs.</p> <p>Council resources will not be able to meet demand. High volumes of individual contact will result in the workforce being unable to focus on complex cases and customers who need tailored assistance.</p> <p>Data will be insecure and at risk of cyber-attacks.</p> <p>Data will be inaccurate and will not provide a true record of each customer.</p> <p>Unable to use data for customer insight.</p> <p>Workforce and customers will not have confidence in IT solutions.</p>	<p>Ensure digital solutions are co-designed with users so the user experience is paramount.</p> <p>Review existing processes and redesign where required to ensure processes are streamlined and efficient and result in positive outcomes.</p> <p>Ensure digital solutions are as wide reaching as possible and meet the needs of the majority of customers who want to use digital solutions.</p> <p>Engage with the workforce and customers to ensure that digital solutions are fit for purpose.</p> <p>Information and Data Strategy and associated IT governance framework will support secure and reliable systems.</p> <p>Regular cyber assurance reporting.</p> <p>Master Data Management systems will contribute to safe storage of accurate data.</p> <p>Joined up working within IT services and across the organisation will ensure that solutions continue to be fit for purpose and meet the needs of internal and external customers.</p>

Other options considered

19. The options considered were:

- a) Do Nothing.
- b) Deliver solutions as requested and when resources allow.

Reasons for the decision/recommendation

20. Delivering solutions as part of an overall strategy is the best way of ensuring that well designed and accessible services are available for customers and the council.

Background papers: None

Appendices:

- Appendix A – Customer and Digital Strategy 2024-29
- Appendix B – Customer and Digital Strategy 2024-29 consultation report
- Appendix C - Customer and Digital Strategy 2024-29 Equality Impact Assessment

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2024 - 2029

Customer and digital strategy

for Norwich City Council

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Foreword

Norwich City Council's vision, as set out in the corporate plan 2024-29 is to become a fair and thriving city, full of ambition. Delivering on key priorities, being an open and modern council and doing the basics well in an efficient, timely and well-informed way is key towards achieving this. This strategy outlines how we will support this vision through the development of our customer and digital services.

Our customers are increasingly wanting to access our services digitally and at a time that suits them. By making our services straightforward, intuitive, and available 24/7 – in the way that we now expect from other organisations – will mean more customers use digital services by default.

By increasing the take up of online services, we will make our services more cost effective, enabling the council to focus resources on those who need them most. But we recognise that it is

not one size fits all and that customers have varying needs, so we will continue to provide traditional contact options for those that have challenges with accessing digital services.

This new strategy will build on the work delivered from the Customer Experience and Digital Strategy 2021-24 that focussed on developing modern, agile workforce tools and the building blocks for better data management.

Talking and engaging with those that use our services while we developed this new strategy has provided us with the insight needed to refocus where we will make improvements. Going forward we will continue with our customer engagement, gathering feedback as we put this strategy into action, to make sure that our digital services are accessible and easy to use. We will also work with other organisations to benchmark our success, share best practice, and develop modern innovative services.



Councillor Matthew Packer
Portfolio holder – customers and digital

2. Vision

Our vision is to become a digital organisation, providing easy to access services that our customers want to use by default.

Our workforce will be supported to develop modern and innovative ways of working, delivering inclusive, cost effective and efficient services.



Our strategy will be led by the Government Digital Service Design principles

- Start with user needs
- Do less
- Design with data
- Do the hard work to make it simple
- Iterate. Then iterate again
- This is for everyone
- Understand context
- Build digital services, not websites
- Be consistent, not uniform
- Make things open: it makes things better.

3. Our customers and our services

Consumer research (customer digital index 2022) suggest that 99% of the UK are now online. In the east of England 89% (UK average 88%) have essential full or partial digital skills for life*.

We understand that the experience of using our online services will be compared with others such as banking, retail and central government therefore moving forward with continuous development and improvement is essential to keep pace with growing customer expectations.

The majority of our customers have access to online and are digitally enabled and they expect our services to be easy to access and available 24/7. Our data shows that there is great opportunity to increase take up by improving their experience of using our services.

It is recognised that some customers cannot access services online and not all enquires are suitable to be accessed in this way.

We continue to provide a:

- telephone service with an option to request a call back and not wait in a queue, with a focus on a quality service with targets achieved for the success of calls.
- face to face appointment service that it is arranged with the most suitable officer to deal with the enquiry to ensure the best outcome and service.
- translation assistance for those who are not able to access information about our services or communicate with us easily. For example, may not be fluent in English, either written or verbal; may need a British Sign Language interpreter or lipreader; or need documents in Braille, or information on audio tape.
- the council website has an accessibility function

Our definition of customer

Within the context of this strategy customers are defined as anyone who lives, works or visits the city council area and our internal workforce and councillors.



*The Essential Digital Skills Survey, conducted by Ipsos MORI on behalf of Lloyds Bank, is the UK's benchmark for digital skills. It measures the fundamental tasks needed to access the online world and the essential digital skills needed for life and work. The most recent survey conducted in 2022, suggests that 99% of the UK are now online. In the east of England 89% (UK average 88%) have essential full or partial digital skills for life.

4. Shaping the strategy - consultation and engagement

This is a council-wide strategy and has been informed by a number of different sources:

- the Corporate Plan 2024-29
- Norwich 2040 Vision
- outcomes from the Customer Experience and Digital Strategy 2021-24
- performance data
- local government best practice
- website analysis
- complaints
- channel shift data
- equality data obtained from our strategy team.

Feedback from:

- consultation survey and workshops
 - councillors
 - colleagues
 - residents
 - voluntary and community groups
 - businesses
- IT Services Survey
- corporate plan consultation
- EDI strategy consultation
- customer user experience/satisfaction feedback.

5. Governance

Our strategy will be supported by a strong governance structure and a **roadmap**.

The delivery status of our objectives and subsequent themes will be supported by a detailed **action plan** that will measure and assess against the strategy and outcomes. This will be shared at directorate, internal boards and with the organisation.

The outcomes measured through Key Performance Indicators (KPIs) will be published externally.

6. Objectives - summary

Our strategy objectives are summarised below. We want to:

- Provide services which are **easy to access**.
- Develop our approach to best serve our customers expecting a **digital service by default**.
- Ensure IT and digital solutions are **reliable and secure**.

Environmental impact

Digital technology will aid the environmental agenda and is a key enabler in supporting low carbon activity:

- Increasing the percentage of digital-led services will reduce the council's environmental footprint, contributing to reaching our 2030 net-zero target. The sending of paper letters has a considerable environmental impact, and so moving towards digital-led services will reduce this*.
- The vast majority of emissions linked to digital services are connected to electricity use; these emissions will further decline as the electricity grid continues to decarbonise and the council ensures its continued procurement of green electricity.

*www.sciencefocus.com/planet-earth/the-thought-experiment-what-is-the-carbon-footprint-of-an-email

Objective 1 – provide services which are easy to access.

We will provide accessible services that are on time, right first time and delivered professionally and inclusively.

We will develop and enhance our online services so that customers will choose to use them by default. Increasing digital services means that we are more cost-effective and enables us to focus our resources on those who need them most.

To achieve this, we will:

- Implement and publish co-designed service standards to ensure that we together we agree these with our customers.
- Implement and publish service standards for key services.
- Review and rewrite customer communications so that they are accessible and understood.
- Promote our online services so that our customers are aware of options available.

- Develop and enhance our customer relationship management (CRM) system and create a dashboard of corporate performance so that standards can be monitored and shared across the organisation.
- Engage with customers and the voluntary sector in the development of our new website and our online services making sure that they are easy to access and use.

Measuring outcomes

As part of the **action plan** development we also need to develop reporting and establish baseline data to create meaningful targets.

We expect to achieve our outcomes across the following areas:

- service standards and performance measures
- customer satisfaction
- enquiries dealt within agreed timescales
- feedback from website customer engagement panel
- online content meets or exceeds web content accessibility guidelines (WCAG 2.1)



Objective 2 – develop our approach to best serve our customers expecting a digital service by default.

We will improve the experience of our digital online services so that customers will use them by choice and ensure they are accessible.

We will develop modern, inclusive technology to provide our workforce with the skills and tools to empower them to work efficiently, collaboratively and creatively.

To achieve this, we will:

- Put user experience and customer focus at the heart of our services and design them to be fully digital.
- Implement a new council website that makes it easier for customers to find information and access services.
- Review and redesign all digital webforms/ service requests so that the design is consistent, accessible and easy for customers to request services.

- Simplify access to customer accounts to make the process of creating an account and accessing information more streamlined.
- Deploy automation where required and appropriate, for example exploring use of AI and chat-bot/virtual assistant internally and on the website.
- Monitor customer feedback and engagement on our website and use this information to make improvements as a result.
- Provide easy to request paperless bills and communications for our customers.
- Develop our workforce systems that includes the project to migrate shared folders to Microsoft 365.
- Develop the use of Microsoft apps and streamline internal processes to support collaborative, agile working for the workforce.
- Provide IT induction training for the workforce to give an overview of the service and how support can be accessed.
- Develop apps that can be used on mobile devices that support more efficient, agile working.

Measure of success

As part of the **action plan** development we also need to develop reporting and establish baseline data to create meaningful targets.

We expect to achieve our outcomes across the following areas:

- Satisfaction with website services.
- Number of unique visitors to our website.
- Percentage of service requests made online (channel shift).
- Registration and usage of customer accounts
- Regular review of website information to ensure it is up to date.
- Reduction in telephone volumes.
- Decrease in carbon footprint.
- Reduction in print, post and cost of communications, both in actual volumes and as a proportion of outbound communications.
- Successful delivery of Microsoft 365 project.
- Implementation of new Microsoft tools and techniques to improve process.
- Take up, completion of and satisfaction with IT induction training for staff.
- Workforce satisfaction with IT services.

Objective 3 – ensure IT and digital solutions are reliable and secure.

We will provide safe and secure services that customers and the workforce can have confidence in using and which are supported by a strong governance framework.

We will be informed by accurate and secure data.

To achieve this, we will:

- Publish an information and data strategy.
- Develop a framework to provide effective governance for all council used IT systems.
- Ensure new and existing systems are safe and secure in line with best practice guidelines.
- Effective disaster recovery procedures are in place and regularly reviewed to minimise disruption.
- Standardise our approach to renewing new and existing systems to ensure effective functionality and governance is in place.

- Migrate to cloud solutions by default.
- Better utilise our IT systems, and where possible, rationalise to realise cost efficiencies.
- Improve the data quality of customer data, including contact details and the development of our master data management solution.
- Use data to proactively support customers and inform strategic planning.
- Support the City Hall project by providing innovative IT solutions that are fit for purpose in a modern working environment.
- Develop the IT service function to enhance support and first time resolution of requests.
- Ensure availability of our systems within core working hours and 24/7 for online services.

Measuring success

As part of the **action plan** development we also need to develop reporting and establish baseline data to create meaningful targets.

We expect to achieve our outcomes across the following areas:

- First time fix for workforce IT requests.
- Reduction in the number of contacts to the support team.
- Workforce satisfaction with IT services.
- IT solutions availability.
- Delivering IT audit actions within agreed timescales.

We will deliver the following and monitor to ensure success:

- Action plan to monitor information and data strategy.
- IT governance framework and change management procedures.
- IT business continuity plans – review regularly.
- Produce a dashboard providing cyber assurance to senior leadership and audit committee.
- Standardised approach to delivery and development of systems.
- A single version of the truth for each customer, contact details and property in our systems.
- Public Services Network (PSN) compliance and Payment Card Industry Data Security Standard (PCI DSS) certification



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Customer and Digital Strategy 2024 -29
Consultation Report

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Executive Summary

ES1 The Customer and Digital Strategy 2024-2029

The Customer and Digital Strategy vision is to:

Become a digital organisation, providing easy to access services that our customers want to use by default.

Be an organisation which supports our workforce to develop modern and innovative ways of working, delivering inclusive, cost effective and efficient services.

ES2 Customer and Digital Strategy 2024-29 Consultation

The consultation was undertaken in October and November 2023. This consisted of five workshops and a survey which was available via the Get Talking Norwich platform. Paper copies were available.

Workshops were delivered in person and online for the following groups:

- colleagues
- councillors
- voluntary sector organisations

The survey was open between 16 October 2023 and 17 November 2023. Survey respondents were asked to identify which of the following groups they belonged to:

- resident
- colleague
- councillor
- voluntary sector organisation
- business

The survey questions focussed on emerging themes which were a result of best practice from local authorities and government guidance, corporate plan aims, the Norwich 2040 vision, initial stakeholder interviews with officers from across all directorates of the council and the Customers, IT and Digital Portfolio Holder.

These emerging themes were:

- Provide services which are **easy to access** for all customers.
- Develop our approach to best serve our customers expecting a **digital first** service.
- Ensure our systems are **reliable and secure**.

Respondents were asked what was most important to them in relation to the three themes. They were also asked to share their ideas to help the council deliver these emerging themes.

The survey was published online on the Get Talking Norwich Platform. Respondents did not have to register with an account to complete the survey.

The survey was widely publicised through social media, Citizen Magazine, BIDS online, The intranet and by email.

ES3 Scope of this report

This report describes the methodology and presents the findings of the Customer and Digital Strategy 2024-29 consultation.

It includes:

- Feedback from the workshops, including the result of a SWOT analysis exercise.
- Quantitative data and analysis of free text comments from the 274 responses to the survey.

ES4 Response Rate - survey

A total of 274 respondents completed the survey. All respondents completed the survey online.

The results of the survey were individually analysed, and it was found that feedback from all categories of respondent were consistent. Therefore survey analysis considered all respondents as a single group.

1 Introduction

1.1 Context

The strategy will underpin the emerging Corporate Plan 2024-29 vision:

Norwich: a fair and thriving city, full of ambition.

The vision contained in the draft Customer and Digital strategy is for Norwich City Council to:

- Become a digital organisation, providing easy to access services that our customers want to use by default.
- Be an organisation which supports our workforce to develop modern and innovative ways of working, delivering inclusive, cost effective and efficient services.

This vision links with the emerging Corporate Plan aim to be an open and modern council which is data and insight driven and people focused.

The Customer and Digital Strategy demonstrates how this vision will be achieved, by delivering these three key objectives:

- Provide services which are **easy to access**.
- Develop our approach to best serve our customers expecting a **digital service by default**.
- Ensure IT and digital solutions are **reliable and secure**.

It will be underpinned by an action plan which will support its delivery and measures success. The consultation was undertaken in October and November 2023 and consultation consisted of workshops and a survey.

This consultation report describes the consultation methodology and the feedback received as part of the development of the strategy – feedback specific to the strategy and in addition, feedback to the emerging Corporate Plan 2024-29 consultation and feedback which informed the Equality Diversity and Inclusion (EDI) strategy.

2 Methodology

2.1 Workshops

A series of workshops were delivered in October and November 2023.

Workshops were delivered in person and online for the following groups:

- colleagues
- councillors
- voluntary sector organisations

2.1.1 Workshop content

Workshops focussed on several discussion topics, which workshop groups were asked to discuss and feedback on.

These included:

- Where should the council be in terms of customer and digital services?
- How can service areas contribute to good, timely service delivery and communications?
- How will the success of the strategy be measured?

All senior leadership and all councillors were invited to at least once workshop.

In the workshop, councillors and senior leadership were asked to complete a SWOT (Strength, Weakness, Opportunities, Threats) analysis.

Workshop feedback was collated and shared with workshop attendees. It was used to contribute to this report and to the development of the draft strategy.

2.2 Survey

The survey was open between 16 October 2023 and 17 November 2023.

The survey was available on the Get Talking Norwich Platform.

Respondents did not have to create an account or log into an account to access the survey.

2.2.1 Survey information

The survey contained the following information as context for the survey questions:

- Background on the development of the Customer and Digital Strategy and the consultation process.
- Customer and Digital Strategy Emerging Themes
- Strategy development timeline

2.2.2 Survey questions

The survey asked respondents how they usually contacted the council and how they would like the council to correspond with them and why.

During the development of the survey questions, we carried out a benchmarking exercise to understand how other authorities had engaged when developing strategies with their stakeholders.

Further questions focussed on emerging themes which had emerged from initial stakeholder interviews.

These emerging themes were:

- Provide services which are **easy to access** for all customers.
- Develop our approach to best serve our customers expecting a **digital first** service.
- Ensure our systems are **reliable and secure**.

Respondents were asked to rate statements about each of the above themes based on their importance. Respondents could select an option from 1 (not important) to 5 (very important).

Respondents were also asked to share free text comments about each of the three emerging themes.

Respondents were asked to provide information about themselves so that the council could check if the responses are representative of people across the city who may have different needs.

2.2.3 Alternative formats

Paper copies and alternative formats were available on request. The survey was advertised in Citizen Magazine, which is delivered to every property in Norwich in a hard copy.

2.3 Promotion of the survey

The survey was widely promoted through social media, Citizen Magazine, BIDS online, the intranet and by email.

2.5 EDI Strategy engagement

The Customer and Digital Strategy will form part of a suite of strategies which underpin the Corporate Plan. The EDI Strategy has recently been completed and feedback from the strategy consultation (surveys and workshops) has been used to inform the draft Customer and Digital Strategy. Details of this can be found in **chapter 8**.

2.6 Consumer research

The Essential Digital Skills Survey, conducted by Ipsos MORI on behalf of Lloyds Bank, is the UK's benchmark for digital skills. It measures the fundamental tasks needed to access the online world and the essential digital skills needed for life and work. The most recent survey conducted in 2022, suggests that 99% of the UK are now

online. In the east of England 89% (UK average 88%) have essential full or partial digital skills for life.

2.7 National Guidance

The strategy is informed by national best practice guidance. Specifically the Government Digital Service Design principles¹. These principles are included on page 3 of the draft strategy and contribute to the objectives the strategy aims to deliver.

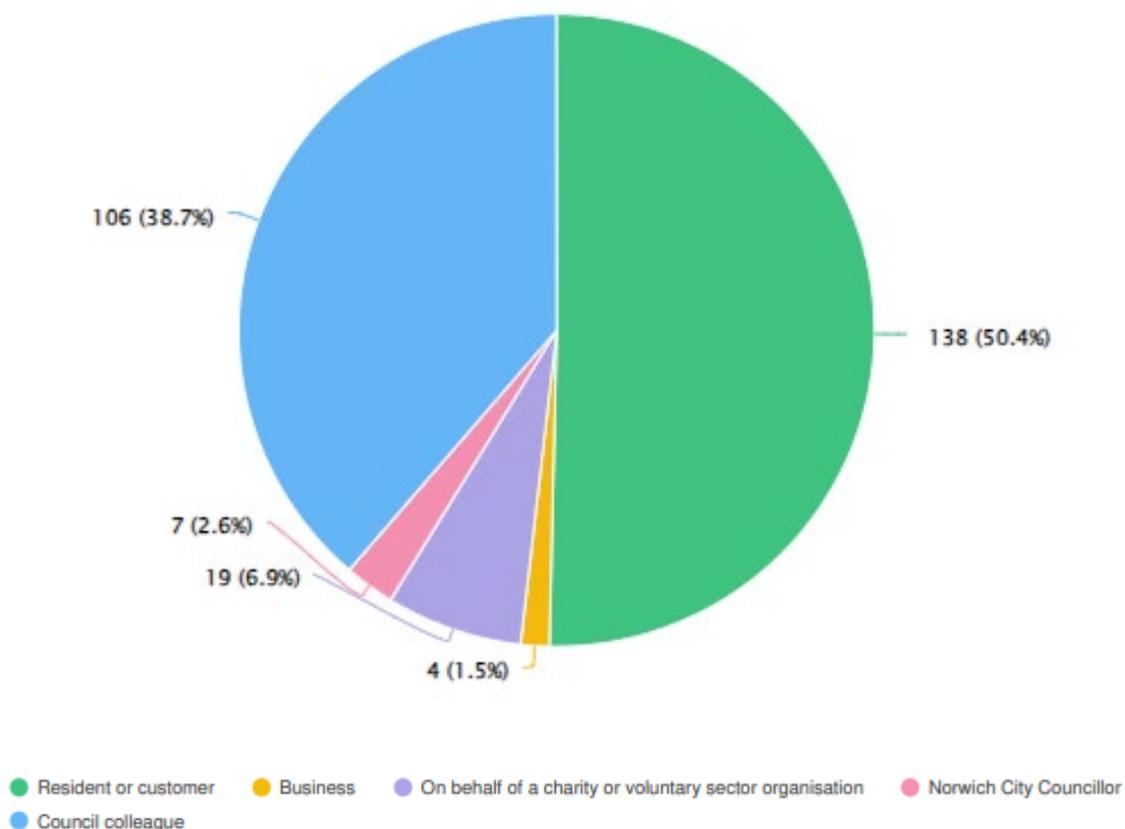
3 Survey response rate and respondent characteristics

3.1 Response rate to the survey

A total of 274 respondents completed the survey.

3.2 Respondent groups

Respondents were asked to categorise themselves one of the following groups. These groups are shown below:



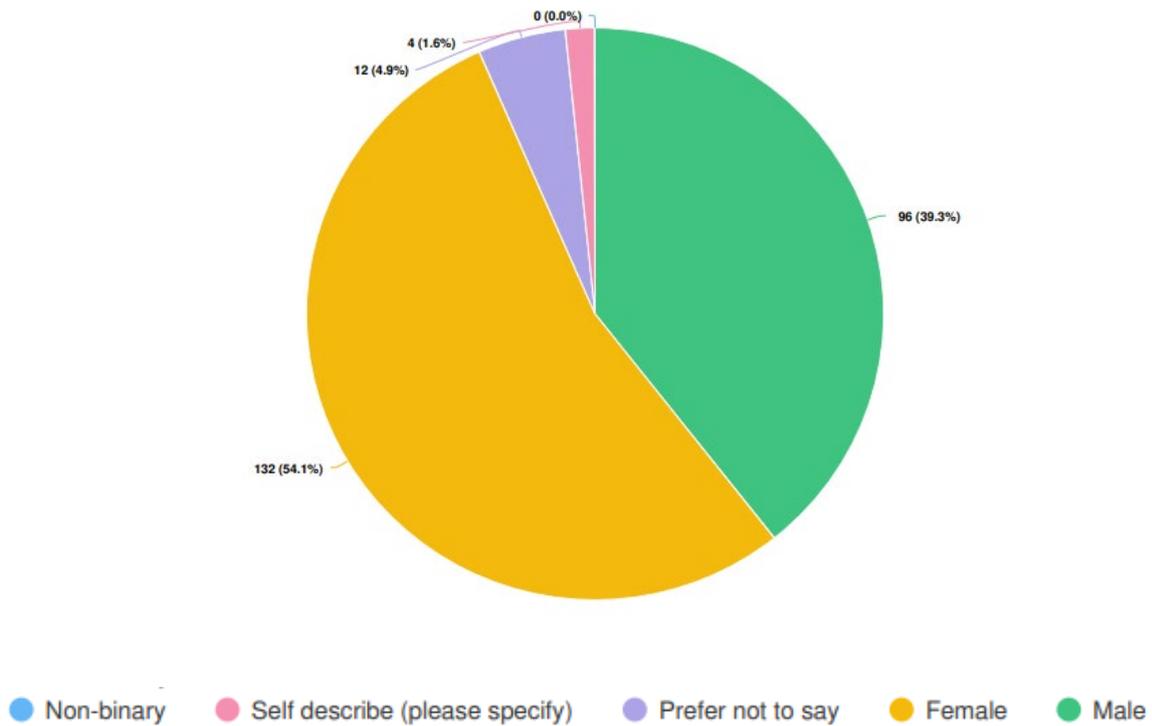
- Residents - 50.4%
- Colleagues - 38.7%
- Representatives of voluntary sector organisations - 6.9%
- Councillors - 2.6%
- Representatives of businesses - 1.5%

¹ [Government Design Principles - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

3.2.1 Gender

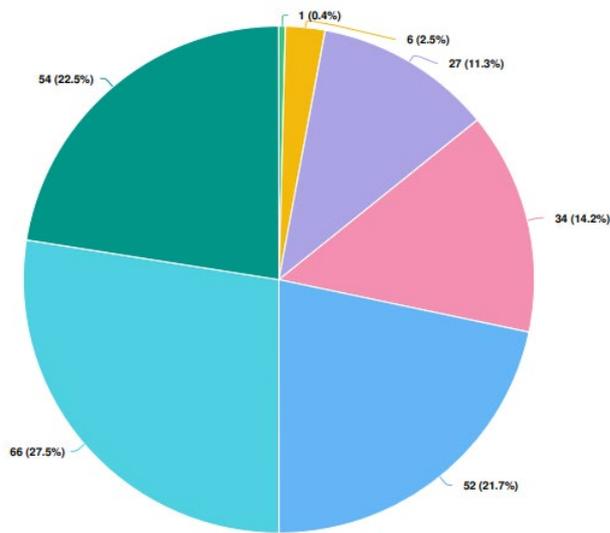
54.1% of all responses identified as female, 39.3% identified as male. 4.9% prefer not to say and 1.6% identified as other groups.

The proportion of responses from females was higher than the proportion of female residents in Norwich (50.6%)



3.2.2 Age

Respondents aged over 45 were over-represented in this survey. Respondents over the age of 45 make up 35.9% of the population of Norwich and 71.7% percent of survey



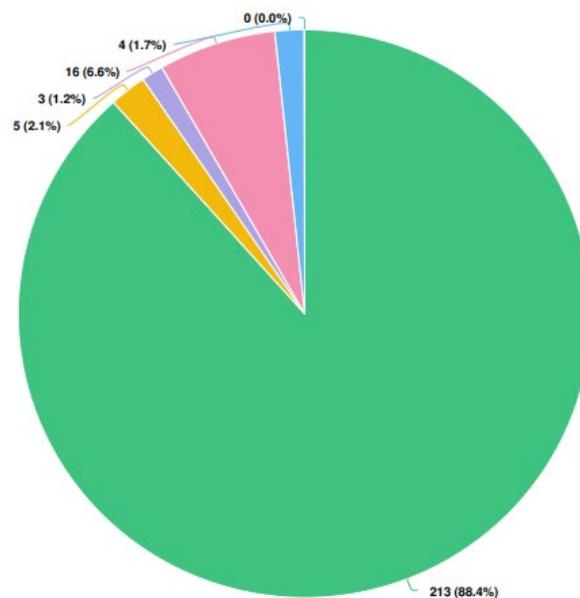
respondents.



Respondents below the age of 45 made up a total of 28.4% of respondents, whereas this group makes up 45.8% of the population of Norwich.

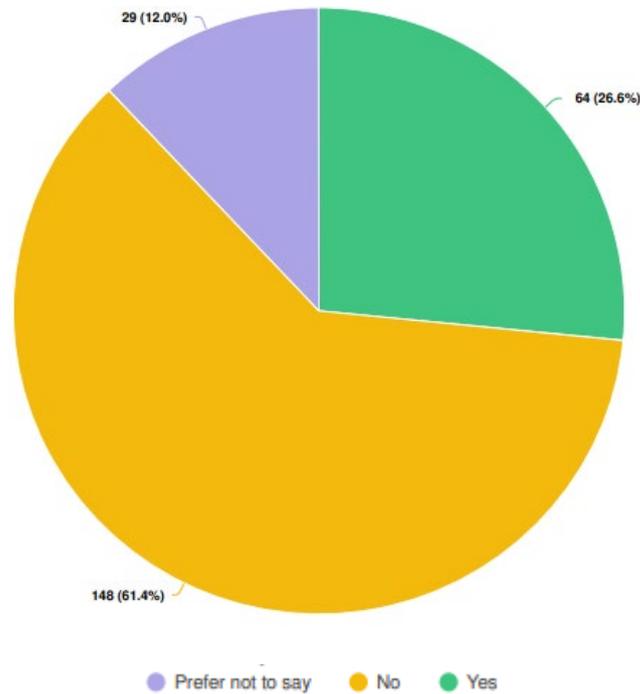
3.2.3 Ethnic Group

The majority of respondents (88.4%) identified as white. This is representative of the population of Norwich as a whole (87.1%).



3.2.4 Long-term health conditions, disability, accessibility need

Respondents were asked if they had a long-term health condition, disability or accessibility need. 61.4% of respondents stated that they did not, 26.6% stated that they did and 12% stated that they would prefer not to say.



4 Feedback - consultation workshops

A number of workshops took place in October and November 2023.

Two in person workshops were held for colleagues, one in person and one online workshop was held for councillors and one online workshop was held for voluntary organisation representatives.

Workshops focussed on a number of discussion topics, which workshop groups were asked to discuss and feedback on.

Workshop feedback was collated and shared with workshop attendees.

4.1.1 Where does Norwich City Council want to be in terms of customer and digital services?

Workshop attendees were asked to work in groups to produce statements in answer to the above question. The following themes were identified.

1. Right first time services
2. Inclusive and resilient services

3. Fully utilised systems
4. Digital first services
5. Supportive services

4.1.2 Inclusion of feedback in the strategy

The feedback above has informed the key objectives of the draft strategy. Points 1,2,3 inform the objective **easy to access**. Point 4 informs the objective **digital by default** and point 5 informs the objective **secure and reliable solutions**.

4.2 SWOT analysis

A SWOT analysis was undertaken by colleagues and councillors attending workshops. Common themes were identified – see 4.2.1 and 4.2.2 for these themes.

4.2.1 What strengths and opportunities should the council include in the Customer and Digital Strategy?

Workshop attendees identified that the following strengths and opportunities should be included:

1. Maximise use of existing systems rather than replace by default.
2. Implement cloud hosted solutions.
3. Website redesign.
4. Digital services which reduce carbon footprint.
5. Increase amount of accurate information available digitally.
6. Interactive digital service – two-way comms and progress chasing
7. Increase service efficiency and outcome for customers.
8. Change to process and culture.
9. Work in partnership with organisations to include outcomes for all customers.
10. Redesign and simplify communications.

4.2.2 Inclusion of feedback in the strategy

The feedback above has informed the key objectives of the draft strategy and are included as examples of how we will meet these objectives. Points 1 and 2 inform the objective **secure and reliable solutions easy to access**. Points 3 -6 inform the objective **digital by default**. Points 7-10 informs the objective **secure and reliable solutions**.

4.2.3 What weaknesses and threats need to be considered when we are delivering the new strategy?

Workshop attendees identified that the following weaknesses and threats needed to be considered:

- Attitudes towards change
- 4G Coverage across Norwich
- Level of internet access for residents
- Reducing budgets
- Limited resources
- Cyber security threats

- Standard of communications
- Ensuring high levels of customer service for those who don't access services digitally.

4.2.4 Inclusion of feedback in the strategy

The weaknesses and threats fed back in the workshop have been considered when forming the draft strategy. For example, it is key that digital solutions can be delivered in the context of reducing budgets and resources.

4.3 Reducing customer contact relies upon good timely service and effective communications. What can you do from your service area to contribute?

Colleagues were asked to think about how service areas could contribute to the delivery. Common themes were identified and these are listed below:

- Increase understanding of how customers are currently accessing digital services.
- Website redesign contributions - service area ownership.
- Communications review and redesign - communicate effectively with customers.
- End to end redesign of service area processes/systems.
- Service area commitment to change.
- Provide a clear and realistic set of service standards - manage expectations.
- Increase digital services available to customers.

4.3.2 Inclusion of feedback in the strategy

The suggestions shared by the colleagues have contributed to actions within the draft strategy which will contribute to the three objectives. For example, 'provide a clear and realistic set of service standards will contribute towards the delivery of the **easy to access** objective.

4.4.1 How can we measure the success of our strategy?

Workshop attendees were asked to identify how the success of the strategy could be measured. Common themes were identified and are listed below:

- Customer satisfaction with the services that they receive from us.
- Providing targeted services informed by accurate data.
- Increase in queries getting resolved right first time.
- Reduction in carbon footprint.
- Dealing with customer queries in agreed timescales and providing updates.

4.4.2 Inclusion of feedback in the strategy

The above measures are all included as measures of success in the draft strategy.

5 Feedback – survey (what is most important)

Respondents were asked to rate statements about each of the above themes based on their importance. Respondents could select an option from 1 (not important) to 5 (very important). The responses obtained from the survey are analysed in in this section of the report.

5.1 Easy to Access

5.1.1 Identified Priorities

Respondents stated which of the listed priorities were most important to them. The top three priorities for all respondent groups were:

1. Dealing with my query within a reasonable timescale
2. The service is professional and friendly.
3. Communication received from us is simple and easy to understand.

5.1.2 Inclusion of Feedback in the Strategy

The feedback above has informed the key objectives and are included within the draft strategy as examples of how we will meet these objectives. All three priorities are included in the **easy to access** objective.

For example, the action to review and rewrite customer communications so that they are accessible and understood' will result in simple and easy to understand communication being sent to customers.

5.2 Digital First

5.2.1 Identified Priorities

Respondents stated which of the listed priorities were most important to them. The top three priorities for all respondent groups were:

- A website that makes it easy to find information and request services
- Ability to access online services using a phone/tablet
- Ability to access your information through accounts online

5.2.2 Inclusion of Feedback in the Strategy

The feedback above has informed the key objectives and are included as examples of how these will be met. All three priorities are included in the **digital by default** objective.

For example, the action to 'implement a new council website that makes it easier for customers to find information and access services' will result in a website that makes it easy to find information and request services.

5.3 Solutions that are reliable and secure

Respondents stated which of the listed priorities were most important to them. The top two priorities for all respondent groups were:

- Your personal data is secure and safe
- A fast and responsive website

5.3.2 Inclusion of Feedback in the Strategy

The feedback above has informed the key objectives and are included as examples of how these objectives will be met. Both priorities are included in the **reliable and secure solutions** objective.

For example, the action to ‘develop a framework to provide effective governance for all council used IT systems’ will ensure that council systems are governed effectively and that the data held in them is secure.

6 Feedback – survey (free text)

Respondents were asked to share free text comments about each of the three emerging themes. Responses were analysed and common themes were identified. This section of the report summarises these themes.

6.1 Easy to Access

6.1.1 Feedback – common themes

The highest volume of free text feedback related to two themes - an easy to understand website and alternative methods of contact for those who did not access digital services.

Examples of feedback are below:

“Clear and up to date website so most things can be dealt with as self-serve online.”

“Progressing digital access, but not at the expense of removing personal, telephone access.”

6.1.2 Inclusion of Feedback in the Strategy

The action to easy to access objective includes the action to ‘engage with customers and the voluntary sector in the development of a new council website and our online services making sure that they are easy to access and use.’ This will contribute to a clear website that more customers can successfully use.

Section 3 of the draft strategy explains how customers who do not access services online are served by the council, for example by telephone or face to face appointments. This demonstrates the council’s commitment to provide accessible services that are delivered professionally and inclusively.

6.2 Digital by Default

6.2.1 Feedback – common themes

The highest volume of free text feedback related to two themes – a simplified website and the provision of a wider variety of services online.

Examples of feedback are below:

“More streamlined customer account, more services online, webchat

“Clearer signposting on the website”

6.2.2 Inclusion of Feedback in the Strategy

These customer priorities will be realised by the implementation of a new council website that makes it easier for customers to find information, access services and complete transactions online. This action is key to the delivery of the **digital by default** objective included in the draft strategy.

6.3 Solutions that are reliable and secure

6.3.1 Feedback – common themes

The highest volume of free text feedback related to the need for a strong governance structure to be in place. Respondents felt it was important for the workforce to have knowledge of good governance and that it should be prioritised by the organisation.

Examples of feedback are below:

“Strong data governance, IT Security”

“Keep up to date with latest security systems and continue to educate officers who have access.”

6.3.2 Inclusion of Feedback in the Strategy

By publishing an information and data strategy and continuing to develop a framework to provide effective governance for all council used IT systems these customer priorities can be realised. This will ensure that **secure and reliable solutions** are delivered for both internal and external customers. The draft strategy includes a number of measures which will demonstrate the success of this activity.

7 Corporate Plan 2024-29 and feedback

The Customer and Digital Strategy will underpin the Corporate Plan 2024-29. Several of the actions and measures within the draft strategy have been informed by the feedback from the Corporate Plan consultation and subsequent development of the plan.

A key driver behind delivering the new customer and digital strategy in 2024 was to ensure that the feedback from extensive corporate plan engagement could be fully utilised to inform the strategy. Over 900 individuals and organisations were engaged as part of this process, including Norwich residents and tenants' groups, councillors and officers, voluntary sector and community organisations, and local businesses and business networks. The below paragraphs demonstrate the links between the emerging Corporate Plan and the strategy.

To achieve a **Fairer Norwich**, services and partnership networks need to be targeted to the areas where they are needed. The Customer and Digital Strategy will help to meet this goal by focussing on providing **digital services by default** and focussing limited budget and resources on complex cases and customers who need additional support.

The emerging Corporate Plan identifies that to achieve a **Climate Responsive Norwich**, the council's carbon footprint needs to be reduced across all services. The Customer and Digital Strategy will demonstrate how an increase in digital communications will contribute to reduced carbon emissions across the authority.

The Corporate Plan identifies that to achieve a **Future Proof Norwich**, the council must partner, enable and listen to public sector, voluntary and charitable organisations, and formal and informal community groups across Norwich. This is also key to becoming **An Open and Modern Council** which designs services around the needs of the communities we serve and involving these communities in the design process. The strategy consultation included a focussed workshop with voluntary and charitable sector organisations. The website redesign project will be informed by a customer engagement panel which will include representatives from those sectors and individuals identified by the corporate plan. Customers will also be asked to co-design new service standards for the council as part of the **easy to access** objective.

The emerging Corporate Plan identifies that in order to be **An Open and Modern Council**, service provision needs to be data-driven and evidence-based. This will be achieved by the provision of the following commitments which support the delivery of the strategy objective **secure and reliable solutions**:

- Improve the data quality of customer data, including contact details and the development of our master data management solution.
- Use data to proactively support customers and inform strategic planning.

8 Equality, Diversity and Inclusion (EDI) Strategy and feedback

The Customer and Digital Strategy will form part of a suite of strategies which underpin the Corporate Plan. These strategies complement and inform one another.

Feedback received as part of the council's Equality, Diversity and Inclusion (EDI) Strategy consultation has helped identify a number of groups in Norwich that may be disadvantaged because of inequality and lack of opportunity. They include those people connected to one or more of the characteristics that are protected under the Equality Act 2010, these being disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. As well as a firm commitment to deliver its legal duty under the Act regarding these characteristics, the council's EDI strategy goes further to include refugees and migrants, those who have served or continue to serve in our Armed Forces, and those impacted by socio-economic and health inequalities resulting from deprivation as the groups it will prioritise within the Strategy's three core aims.

These groups are also adopted by the Customer and Digital Strategy within its easy to access objective – which seeks to 'provide accessible services that are on time, right first time and delivered professionally and inclusively.' Accessibility was highlighted a number of times in the EDI consultation feedback – this includes the importance of offering alternatives to digital services. Chapter 3 of the draft Customer and Digital Strategy

focuses on the council's support for customers who do not use digital services and how the organisation will continue to engage with these customers by providing an **easy to access** service.

Calls for clear and measurable goals and objectives within the council's strategies are also contained within the feedback cited above, with respondents stressing the importance of accountability and the monitoring and reporting of progress towards these goals. The Customer and Digital Strategy includes a number of clear, concise and measurable outcomes which will be supported by a detailed action plan that will assess achievements against those stated outcomes.

In addition, the EDI feedback highlighted collaboration, and the need for the council to work with partners when delivering its strategies. Consultation undertaken to inform the Customer and Digital Strategy included a focussed workshop with voluntary and charitable sector organisations. Similarly, the website redesign project within the Customer and Digital Strategy will be informed by a customer engagement panel which will include representatives from the priority groups identified within the EDI Strategy.

High level equality impact assessment for strategic programmes

Programme title	Customer and Digital Strategy 2024-2029	Programme start date	This strategy will be published following Cabinet Approval on 6 March 2024.
Team	Customers, IT and Digital	Directorate	Corporate and Commercial Services
Senior leadership team sponsor	Julia Medler	Role	Head of Customers, IT and Digital
Officer completing	Katherine McCurday	Role	Digital Business Manager

What are the main aims or purpose of the programme?

Norwich City Council's vision, as set out in the corporate plan 2024-29, is to become an open and modern council, which works in partnership and does the basics right. This strategy is key to how we will support that through the development of our customer and digital services.

Our customers are increasingly wanting to access our services digitally and we want to make these services easy to access for those who want to access digital services by default. We also need to ensure that our systems and digital solutions are reliable and secure to instil confidence in our customers who use them.

By making the majority of our services available digitally, the council can focus its resources on complex cases and on those customers who need them most.

We recognise that it is not one size fits all and that customers have varying needs, so we will continue to provide traditional contact options for those that struggle with accessing digital services.

This new strategy will build on the work delivered from the Customer Experience and Digital Strategy 2021-24 that focussed on developing modern, agile workforce tools and the building blocks for better data management.

The strategy has three key objectives which are to:

- Provide services which are **easy to access**.
- Develop our approach to best serve our customers expecting a **digital service by default**.
- Ensure IT and digital solutions are **reliable and secure**.

The delivery status, key objectives and subsequent themes will be supported by a detailed action plan that will measure and assess against the strategy and outcomes.

How does it fit with other services and policies, and how does it support our [corporate objectives](#)?

The Customer and Digital strategy is a whole organisational strategy. It will inform work undertaken across council service to deliver good customer service which is easily accessible, gets the basics right and deliver successful outcomes for all our customers.

This strategy underpins the Corporate Plan 2024-2029 will contribute towards the corporate goal of becoming an open and modern council, which works in partnership and does the basics right.

This strategy will contribute to the corporate goal of becoming a climate responsive Norwich.

The strategy's objectives link with other strategies including the EDI strategy and the data and information strategy.

What outcomes do we want to achieve, why and for who?

The outcomes we want to achieve are:

- We will provide accessible services that are on time, right first time and delivered professionally and inclusively.
- We will develop and enhance our online services so that customers will choose to use them by default. Increasing digital services means that we are more cost-effective and enables us to focus our resources on those who need them most.
- We will improve the experience of our digital online services so that customers will use them by default and ensure they are accessible.
- We will develop modern, inclusive technology to provide our workforce with the skills and tools to empower them to work efficiently, collaboratively and creatively.

- We will provide safe and secure services that customers and the workforce can have confidence in using and which are supported by a strong governance framework.
- We will be informed by accurate and secure data.

We want to achieve these outcomes for all our customers. In the context of the strategy, customers are defined as anyone who lives, works or visits the city council area and our internal workforce and councillors.

We have consulted with our customers in the development of the strategy and customer priorities have informed the strategy. Consultation was carried out through meetings with key stakeholders, workshops with SLT, members and voluntary sector. A survey was also published for residents, businesses, voluntary sector, council workforce and councillors.

A report detailing the consultation responses and response demographic has been produced and presented to leader and portfolio.

The delivery status, key objectives and subsequent themes will be supported by a detailed action plan that will measure and assess against the strategy and outcomes.

This Equality Impact Assessment will be updated to reflect progress against these objectives once the action plan is published in July 2024.

Will anyone be disproportionately affected by the programme (customers, employees, those with protected characteristics or groups in the wider community)?

No one group will be disproportionately affected by the delivery of the strategy, including those with protected characteristics. Whilst a key objective of the strategy is to provide digital services by default, this is for those customers who wish to access services in this way.

The council will continue to provide traditional contact options for those who want and need to use these options, including a telephone service with an option to request a call back, a face-to-face appointment system or translation assistance. The council website has an accessibility function.

The strategy has been informed by input and feedback from customers and reflects their priorities. A workshop with voluntary organisations, representing those with protected characteristics was held as part of the consultation period and fed into the shape of

<p>the strategy. The digital UX lead is setting up an engagement panel to ensure that these groups are represented in the delivery of the digital projects which underpin the strategy.</p>		
<p>If yes, will these be adverse impacts (specify whether high, medium or low impacts)? N/a – see above for details on how groups will not be adversely affected by the strategy.</p>		
<p>If yes, can the impacts be</p>	<p>a) justified? n/a</p>	<p>b) mitigated? n/a</p>
<p>What is the reason for the proposal or change (financial, legal etc)? <i>The Equality Act requires us to make this clear.</i> This customer and digital strategy 2024-29 will build on the work delivered from the Customer Experience and Digital Strategy 2021-24. Prior to the previous strategy expiring, it was decided to create a new strategy which would be in line with the new corporate plan 2024-2029.</p>		

Officer completing EqIA	Katherine McCurday	Date	02.02.2024
SLT sponsor	Julia Medler	Date	05.02.2024
Equality lead (strategy team)	Joe Siggins	Date	02.02.2024



Committee name: Cabinet

Committee date: 06/03/2024

Report title: Pay Policy Statement 2024/25

Portfolio: Councillor Kendrick, cabinet member for resources

Report from: Head of HR and organisational development

Wards: All wards

OPEN PUBLIC ITEM

Purpose

To note and recommend to full Council the pay policy statement for 2024/25.

Recommendation:

It is recommended that the contents of the pay policy statement for 2024/25 are noted and agreed and that a recommendation is made to full Council to approve the Council's pay policy statement for 2024/25.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report meets the Norwich City Council is in good shape to serve the city corporate priority

This report helps to meet the modernising the council objective of the COVID-19 Recovery Plan.

Report details

1. Section 38 (1) of the Localism Act 2011 requires the Council to consider, approve and publish a pay policy statement for each financial year. The pay policy statement must be approved by a resolution of the full Council by 31 March each year.
2. The pay policy statement must as a minimum set out the council's policies relating to:
 - a) the remuneration of its chief officers
 - b) the remuneration of its lowest paid employees
 - c) the definition of the lowest paid employees adopted by the council for the purposes of the pay policy statement and the reasons for adopting that definition
 - d) the relationship between the remuneration of its chief officers and employees who are not chief officers
 - e) the publication of and access to information relating to remuneration of chief officers

It must also comply with the statutory and supplemental guidance issued by the Department for Levelling Up, Housing and Communities.

3. The pay policy statement for 2024/25 is attached as Appendix 1.
4. The pay policy statement for 2024/25 incorporates the following changes:
 - a. Updated salaries to reflect the Joint Negotiating Committee (JNC) for Chief Executive and Chief Officer pay award effective from 1 April 2023 to 31 March 2024, para 2.5 of the pay policy statement. This represents an increase of 3.5% on all pay points.
 - b. Updated salaries to reflect the National Joint Council (NJC) for local government services pay award effective from 1 April 2023 to 31 March 2024, para 1.6 of the pay policy statement. This represents an increase of £1,925 on pay points 4 to 42 and a 3.88% increase on all other pay points.
 - c. Pay multiples have been updated in para 5. The ratio between the highest paid employee and other employees based on the median earner has improved from 1:4.68 to 1:4.28. The ratio of the highest and lowest pay points has improved from 1:6.86 to 1:6.51.
 - d. Para 2.4 has been updated to provide clarity regarding approval for salary packages of £100,000 per annum or greater.
5. Agreements on pay increases for 2024/25 have not been reached. The pay rates and pay ratios detailed in the pay policy statement will be updated in line with any agreed pay increase for 2024/25.
6. The pay policy statement meets the statutory requirements of the Localism Act 2011.

7. The council's first pay policy was approved by full Council on 20 March 2012, and in each subsequent year.

Consultation

8. The remuneration and terms of condition of employment contained in the pay policy statement have been subject to formal consultation with UNISON, the council's recognised trade union. The pay policy statement for 2024/25 has been circulated to members of the Joint Consultative and Negotiating Committee.

Implications

Financial and resources

9. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.
10. There are no proposals in this report that would reduce or increase resources. The pay policy statement sets out current remuneration arrangements and there are no additional or increased financial implications arising from the pay policy statement.
11. The salary scales are based on the 2023/24 financial year. The council adopts the nationally negotiated local government pay agreements. The recognised trade unions have not submitted a pay claim for 2024/25 and national pay negotiations have not commenced. Increases for 2024/25 have not yet been agreed and therefore the financial implications are unknown at this time. An assumption of a £2,000 increase per person, on all pay points, has been included in staffing budgets for 24/25 to cover inflation, as well as separate amounts for incremental drift. Should the nationally negotiated pay agreements exceed the budget assumptions the financial implications will need to be given further consideration.

Legal

12. It is a legal requirement under the Localism Act 2011 for the council to have and publish an annual pay policy statement.

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	The council applies the National Joint Council (NJC) job evaluation scheme. Decisions on pay are fair, equitable and transparent. An equality impact assessment was carried out when the current pay structure was introduced and equality impact assessments are carried out on policies impacting on employees and on an action specific basis, as appropriate

Consideration	Details of any implications and proposed measures to address:
Health, social and economic impact	The councils pay policy and adoption of living wage foundation living wage supports financial inclusion and is likely to have a health, social and economic impact.
Crime and disorder	None
Children and adults safeguarding	None
Environmental impact	None

Risk management

Risk	Consequence	Controls required
The Council does not fulfil the requirements of the Localism Act 2011 in agreeing and publishing the pay policy statement.	The Localism Act is not complied with.	The pay policy statement will be considered at full Council before 31 March and published on the Councils website within 21 days of approval.

Other options considered

13. None – the production and publication of a pay policy statement is a statutory requirement under the Localism Act.

Reasons for the decision/recommendation

14. To meet the requirements of the Localism Act 2011

Background papers:

None

Appendices:

Appendix 1 Pay Policy Statement 2024/25

Contact officer:

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	<p>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.</p>
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PAY POLICY STATEMENT 2024-25

Introduction

This pay policy statement is provided in accordance with Section 38 of the Localism Act 2011 and is effective from 1 April 2024. The pay policy statement was approved at a meeting of full Council on **(add date)**.

Scope

This document sets out the council's pay and reward arrangements for the whole workforce including senior pay arrangements. The pay policy statement excludes pay arrangements and terms and conditions of employment of employees who have transferred into the council and are protected under the Transfer of Undertakings (Protection of Employment) regulations.

1. Employee remuneration up to and including heads of service

- 1.1 Employees up to and including head of service grades are subject to the National Joint Council (NJC) for local government services national agreement on pay and conditions of service. These are supplemented by locally agreed collective agreements reached with trade unions recognised by the council.
- 1.2 The council's pay structure commences at spinal column point (SCP) 4 up to SCP 59L. SCP's 4 to 43 reflect the NJC national pay points, SCP's 44L to 59L are locally agreed pay points.
- 1.3 There are 14 grades within the pay structure. Grade 1 is the lowest grade and grade 14 is the highest grade. Grades 13 and 14 apply to head of service posts.
- 1.4 Salaries in the pay grades 1 -14 are updated in line with pay awards notified from time to time by the NJC for local government services.
- 1.5 Posts are allocated to the pay grades through a process of formal job evaluation using the NJC job evaluation scheme.

1.6 Pay and grading structure – pay rates 1 April 2023 – 31 March 2024*

Grade	JE score	SCP	Annual salary	Hourly rate
Grade 1	Up to 260	4	£23,114	£11.98
		5	£23,500	£12.18
Grade 2	261 - 291	6	£23,893	£12.38
		7	£24,294	£12.59
Grade 3	292 - 332	8	£24,702	£12.80
		9	£25,119	£13.02
		10	£25,545	£13.24
		11	£25,979	£13.47
		12	£26,421	£13.69
		13	£26,873	£13.93
Grade 4	333 - 373	14	£27,334	£14.17
		15	£27,803	£14.41
		16	£28,282	£14.66
		17	£28,770	£14.91
		18	£29,269	£15.17
		19	£29,777	£15.43
Grade 5	374 - 414	20	£30,296	£15.70
		21	£30,825	£15.98
		22	£31,364	£16.26
		23	£32,076	£16.63
		24	£33,024	£17.12
Grade 6	415 - 455	25	£33,945	£17.59
		26	£34,834	£18.06
		27	£35,745	£18.53
		28	£36,648	£19.00
Grade 7	456 - 501	29	£37,336	£19.35
		30	£38,223	£19.81
		31	£39,186	£20.31
		32	£40,221	£20.85
Grade 8	502 - 547	33	£41,418	£21.47
		34	£42,403	£21.98
		35	£43,421	£22.51
		36	£44,428	£23.03
Grade 9	548 - 593	37	£45,441	£23.55
		38	£46,464	£24.08
		39	£47,420	£24.58
		40	£48,474	£25.13
Grade 10	594 - 644	41	£49,498	£25.66
		42	£50,512	£26.18
		43	£51,515	£26.70
		44L	£53,138	£27.54

Pay and grading structure – pay rates 1 April 2023 – 31 March 2024* (continued)

Grade	JE score	SCP	Annual salary (FT)	Hourly rate
Grade 11	645 - 695	45L	£54,172	£28.08
		46L	£55,555	£28.80
		47L	£56,973	£29.53
		48L	£58,431	£30.29
Grade 12	696 - 751	49L	£59,166	£30.67
		50L	£61,461	£31.86
		51L	£63,038	£32.67
		52L	£64,655	£33.51
Grade 13	752 - 812	53L	£65,568	£33.99
		54L	£68,020	£35.26
		55L	£69,770	£36.16
		56L	£71,944	£37.29
Grade 14	813+	57L	£73,212	£37.95
		58L	£75,299	£39.03
		59L	£77,242	£40.04

*To be updated in line with national pay agreement for 2024/25 when agreed.

1.7 Employees on Grade 1 are defined as our lowest paid employees.

1.8 The council pays employees no less than the Living Wage Foundation living wage rate. The rate is reviewed and updated by the Living Wage Foundation annually, normally in November for implementation within six months. If the council's lowest pay grade falls below the living wage rate, a supplement will be paid to equate to the living wage rate from 1 April following any increase.

2. Chief executive and chief officer pay

2.1 The council's chief executive is the head of paid service, and the executive directors are chief officers. The roles of director are deputy chief officers, however, the pay arrangements for chief officers have also been applied to director roles.

2.2 The current pay arrangements are locally determined and operated. Salaries in these pay grades are updated in line with pay awards notified from time to time by the Joint Negotiating Committee (JNC) for Chief Executives and Chief Officers.

2.3 The pay and grading structure for chief officers was agreed by full Council on 22 September 2020.

2.4 The establishment of new positions with proposed salary packages of £100,000 per annum or greater are subject to approval by full Council. Appointments to existing positions on salary packages of £100,000 per annum or greater, within the remit of the agreed pay policy statement, will be made by

the member appointments panel. Appointments to the statutory roles of head of paid service, s151 officer and monitoring officer are subject to approval by full Council.

2.5 Chief executive and chief officer and director grading structure

Grade	SCP	1 April 2023 – 31 March 2024*	
		Annual Salary (FT) £	Hourly rate £
Chief Executive	150	£138,194	£71.63
	151	£141,289	£73.23
	152	£144,385	£74.84
	153	£147,480	£76.44
	154	£150,575	£78.05
Executive Director	110	£101,157	£52.43
	111	£104,973	£54.41
	112	£108,788	£56.39
Director	106	£82,089	£42.54
	107	£85,903	£44.52
	108	£89,717	£46.50
	109	£93,531	£48.87

*To be updated in line with national pay award for 2024/25 when agreed

2.6 The terms and conditions of employment for the chief executive and chief officers are determined in accordance with collective agreements, negotiated from time to time, by the JNC for Chief Executives and the JNC for Chief Officers, as set out in the Scheme of Conditions of Service. These are supplemented by local agreements reached with trade unions recognised by the council and by the rules of the council.

3. Heads of service

3.1 In accordance with the Local Government and Housing Act 1989 a non-statutory chief officer for the purposes of this pay policy statement is defined as a person who reports directly to or is accountable directly to the head of paid service. A deputy chief officer is defined as a person who reports directly to or is directly accountable to a statutory or non-statutory chief officer. This definition excludes secretarial, clerical and support services.

3.3 These heads of service are not subject to the pay and conditions of service determined by the JNC for Chief Officers of local authorities but are employed under NJC terms and conditions of employment and are paid in line with the pay structure detailed in 1.6.

- 3.4 The head of legal and procurement holds the statutory role of monitoring officer. This role is subject to the NJC terms and conditions of employment, and the pay structure detailed in 1.6.

4. Other arrangements

4.1 Election fees

The Returning Officer has overall responsibility for the conduct of elections and is appointed under the Representation of the People Act 1983. The role of returning officer is carried out by an employee of the council but is carried out in a personal capacity and is distinct and separate from their duties as an employee. Election fees are paid for the additional duties and are paid separately to the normal salary arrangements.

The chief executive is the council's Returning Officer.

Fees for Parliamentary, Police Commissioner, Referendum and European elections are set by parliamentary statutory order.

Fees for undertaking County and District elections are calculated in accordance with a formula agreed annually by the Norfolk Chief Executives' Group, based on a recommendation by the County Electoral Officers' Group.

The setting of Returning Officer fees is considered by a meeting of the Chairpersons of the Norfolk authorities' member remuneration panels.

Other employees of the council, including senior officers within the scope of this policy may receive additional payment for specific election duties.

5.0 Lowest and highest paid employees

- 5.1 The council's lowest paid employees are paid on Grade 1 of the pay structure. The minimum pay point paid to any employee is SCP 4 of the pay structure. This equates to a basic salary of £23,114 per annum. The salary range for Grade 1 is £23,114 to £23,500 per annum.

The council's highest paid employee is the chief executive. The chief executive salary scale ranges from £138,194 to £150,575 per annum.

5.2 Pay Multiples

The ratio between the highest paid employee and other employees based on the median earner is 1:4.28.

The ratio of the highest and lowest pay point, based on full time equivalent salaries at 31 March 2024 is 1:6.51.

In calculating the pay ratios, full time equivalent salaries and basic pay have been used. Basic pay excludes overtime, additional hours and other additional salary related payments.

- 5.3 The council does not have a policy on maintaining or reaching a specific pay ratio between the highest and lowest paid employees.

6.0 General principles applying to remuneration of all employees

6.1 Living wage

The council is an accredited Living Wage Foundation living wage employer and has adopted a living wage policy for employees and agency workers and contractors engaged through the council's procurement processes.

6.2 Pay on appointment

Starting salary on appointment is determined by assessment of relevant experience and competence to undertake the job role and taking account of current salary level. Salary on appointment will be within the salary range for the post.

6.3 Pay progression

All employees are remunerated on a pay range. The pay policy recognises that movement through defined pay ranges should continue as employees increase their effectiveness and expertise through knowledge and experience and most employees will normally receive an annual increment on 1 April each year up to the maximum point of the pay grade.

Employees appointed between 1 October and 31 March receive their first increment after 6 months in post and any subsequent increments on 1 April each year.

Accelerated increments can be awarded based on special merit or ability, subject to the maximum of the scale not being exceeded.

6.4 Relocation and disturbance

Relocation expenses may be granted where new employees are required to move to the area to take up employment and their circumstances meet the criteria laid down in the relocation assistance scheme.

Existing employees required to move home for their employment or who incur additional costs because of a decision of the council in respect of their employment may be eligible for reimbursement of some expenses depending on the circumstances.

6.5 Expenses and Travel

- Travel for work

Employees are not required to provide a car for work purposes and pool cars are available for official business travel.

Employees may choose to use their own transport for official business travel and are reimbursed at the following rates:

Mileage per mile first 8,500 miles	46.9 p
Mileage per mile after 8,500 miles	13.7 p

Employees who choose to use a cycle for official business purposes and have not obtained the cycle through the cycle to work scheme, will be reimbursed in line with the mileage rate applicable for motorised vehicles.

Employees required to have access to a vehicle, because of the nature of their duties are classified as operational users. Operational users have access to pool cars but may use their own vehicle and be reimbursed mileage.

- **Car Parking**

Operational users who work in or from city hall and use their own vehicle for work purposes are provided with a city centre car park pass.

Employees who are required to remain at work or return to work to attend an evening meeting will be provided with a city centre car park pass to enable them to attend the evening meeting.

Employees working at other council buildings may use the parking at the site, where this is available.

- **Subsistence**

Subsistence will be paid to employees who necessarily incur additional expense in the course of their work. Claims will generally be supported by a receipt. Actual expenditure is reimbursed, subject to locally agreed maximum amounts.

6.6 **Bonus scheme**

The council does not operate a bonus scheme.

6.7 **Performance related pay**

The council does not operate a performance related pay scheme.

6.8 **Professional fees and subscriptions**

The council reimburses professional fees and subscriptions as follows:

- employees undertaking approved studies towards a professional qualification, which require professional membership. The subscription is paid for the period of the studies, subject to satisfactory progress being made.
- specified professions where there are proven recruitment difficulties as a recruitment and retention incentive.
- statutory chief officers where the professional membership is a requirement in accordance with their statutory function.

6.9 Overtime and enhancements

Some posts within the council attract enhancements and/or overtime payments. Overtime and enhancements are applied in accordance with set criteria which are nationally and locally agreed.

6.10 Honoraria

If it is appropriate for an honorarium to be paid, this will be in accordance with agreed criteria for payment of honoraria.

6.11 Severance arrangements

On ceasing to be employed by the council, employees will only receive compensation where this is appropriate as outlined below:

- i. Employees who are dismissed on the grounds of redundancy and who have a minimum of two years' continuous service with the council will normally be entitled to be paid statutory redundancy pay, which is calculated according to the individual employee's age, length of service and gross weekly pay subject to a statutory maximum.

The Local Government (early termination of employment) (Discretionary Compensation) England and Wales Regulations 2006 enable local authorities to pay discretionary compensation in certain circumstances above the statutory entitlement. The council has exercised its discretion to increase the redundancy payment as follows:

- the statutory upper pay limit will be disregarded when calculating a week's pay for the purposes of the statutory redundancy payment and will calculate redundancy payments based on actual week's pay.
- the redundancy payment will be enhanced by a factor of 1.5.

Redundancy calculation is the same across the council irrespective of position and pay grade.

Employees aged 55 and over and who are redundant and are members of the local government pension scheme immediately become entitled to receive their pension benefits. Pension benefits are not increased or augmented in these circumstances.

- ii. In exceptional circumstances and where the business case supports it, the council may agree to a severance package in relation to termination of employment, to avoid or settle a legal claim.
- iii. Severance packages of £100,000 or more will be considered at full Council.

6.12 Pension

All employees who have a contract of employment for at least 3 months and are under age 75 are eligible to join the Local Government Pension Scheme. Employees who are eligible for membership automatically become members of the scheme unless they opt out.

The council contribute to the employee's pension, expressed as a percentage of the employee's pensionable pay. The employer contribution rate is assessed and set every three years following an actuarial valuation of the Norfolk Pension Fund.

The employee also contributes to their pension. The employee contribution rates vary from 5.5% to 12.5% of actual pensionable pay.

The council auto enrolls all eligible employees into the Local Government Pension Scheme in accordance with legislative requirements.

6.13 Flexible retirement

The council considers requests for flexible retirement from employees aged 55 and over who reduce their grade and/or hours of work. This enables the employee to have immediate access to their Local Government Pension Scheme benefits whilst retaining employment.

Requests are normally only granted when the overall financial impact is neutral or results in savings for the council.

The council does not waive any actuarial reductions resulting from early payment of pension benefits for flexible retirement.

6.14 Market supplements

The council will consider the payment of market pay supplements in exceptional circumstances and where there are significant external market pressures impacting on recruitment and retention. Market supplements are applied, reviewed and withdrawn in accordance with the council's market supplement policy.

6.15 Re- engagement

All posts are advertised in accordance with the council's recruitment policies. Appointments and any decision to re-employ a former employee, who left employment in receipt of a severance or redundancy payment, will be made on merit.

6.16 Contracts for services

The council will seek to appoint individuals to vacant posts using the recruitment procedures on the basis of contracts of employment and apply direct tax and national insurance deductions from pay through the operation of PAYE.

Interim appointments are made in accordance with the council's procurement policies and the provisions for contract for services.

Consultants and agency workers are not employees of the council and are not covered by this pay policy statement but may be appointed as an officer of the Council by the Chief Executive or an Executive Director for the purposes of delegating functions and decisions.

Where there is a need for consultant/interim support, the council will seek to avoid contractual arrangements which could be perceived as being primarily designed to significantly reduce the rate of tax paid by that person, such as paying the individual through a company, effectively controlled by him or her.

In line with the Agency Workers Directive, the council will aim to pay workers engaged through a contract for services at a rate consistent with the pay and reward of the councils directly employed workforce. In some instances, there may be a need to consider market factors in determining an appropriate pay level.

Where interim workers are engaged by the council, an assessment will be completed to establish whether they fall within the scope of IR35 legislation using the HMRC status tool. Workers that fall within scope will have income tax and national insurance contributions deducted.

6.17 Salary sacrifice

The council provides salary sacrifice arrangements for childcare vouchers and the cycle to work initiative.

6.18 Gender pay gap

The Government implemented mandatory gender pay gap reporting for employers with 250 or more employees in April 2017.

Gender pay gap information for the council can be viewed on the gender pay gap service.

<https://gender-pay-gap.service.gov.uk>

7.0 Amendment and review of pay policy

The council's pay policy statement will be reviewed and agreed by full council on an annual basis and before 31 March each year.

If it is necessary to amend the pay policy statement during the year that it applies, any amendment will be by resolution of the full Council.

The policy and any subsequent amended policy will be published on the council's website within 21 days of full council approval.



Committee name: Cabinet

Committee date: 06/03/2024

Report title: Funding Approval for Three Carbon Reduction Projects

Portfolio: Councillor Hampton, Cabinet member for climate change

Report from: Interim executive director of major projects

Wards: All wards

OPEN PUBLIC ITEM

KEY DECISION

Purpose

This report advises the council on actions undertaken to deliver on the climate agenda. It keeps members apprised on the recently submitted bid to improve the energy efficiency of the Council's social housing stock. Also due to recent news of a successful solar panel bid and the identification of opportunities to obtain grant funding for an energy heat network business case, we are seeking delegated authority to progress with the development of the business case during the pre-election period.

Recommendation:

To recommend that Council delegates authority to the council's Chief Finance (s151) Officer in consultation with the portfolio holder for Resources to:

- a) Sign a memorandum of understanding (MoU) with the Department of Net Zero and Energy Security (DESNZ) to agree terms and conditions for Social Housing Decarbonisation funding up to a value of £3m;
- b) Increase the HRA Capital Programme by an amount equivalent to any DESNZ grant funding agreed plus the match funding element from the council, currently anticipated to be £2.7m;
- c) Increase the General Fund Capital Programme by £0.895m for the solar panel project on Riverside Leisure Centre and formally sign any related grant documentation for £0.520m. Note that the funding requirement from the council of £0.375m can be funded from borrowing; and
- d) Apply and sign a grant application for heat networks feasibility and business case.

To delegate authority to the Executive Director of Housing and Community Safety and the Chief Finance (s151) Officer in consultation with the portfolio holder for Climate Change to:

- e) sign subsequent delivery contracts for the energy efficiency works on the council's social housing stock;

To delegate authority to the Executive Director of Housing and Community Safety in consultation with the portfolio holder for Climate Change to:

- f) sign subsequent delivery contracts for the solar panel project at Riverside Leisure; and

To delegate authority to the Chief Finance (s151) Officer in consultation with the portfolio holder for Climate Change to:

- g) to sign subsequent procurement contracts for the energy network items detailed within the report.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report meets the Norwich is a sustainable and healthy city corporate priority.

Background

1. The Council has declared a climate emergency and has a clear carbon reduction commitment for its own activities and across the city. The council will also be developing detailed service plans behind the Corporate Plan policy strands that link to net zero over the coming months.
2. In the meantime, the council has been identifying opportunities where it is clear there will be a financial return at least covering cost or where the direction of travel on achieving net zero is already clear.
3. The three opportunities in this paper fit the overall corporate goal of targeting carbon reduction measures on its own activities.

Social Housing Stock Energy Efficiency Measures

4. Following the success of the council's Social Housing Decarbonisation Fund (SHDF) Wave 1 project and as part of the council's ongoing and ambitious programme to improve the energy efficiency of its own social housing stock, a bid for £2.5m of funding was submitted to the SHDF Wave 2.2 funding round at the end of January 2024. This includes proposed match funding of £2.7m from the HRA capital programme. The total project value is therefore provisionally £5.2m which is planned to be spent over a 24-month period.
5. To enable flexibility and given the possibility that the funder may offer a sum greater than the funding bid for, the request for delegated authority has been limited to £3m.
6. The bid will deliver 672 energy efficiency measures on 261 dwellings including external wall insulation, improved ventilation, solar PV and loft insulation. The improvements are focused on the council's least energy efficient properties constructed using the 'Wimpey no-fines' post war method of building, which results in high heat loss through walls.
7. The scheme supports residents by improving comfort, making homes healthier to live in and reducing energy bills, whilst at the same time reducing greenhouse gas emissions from our social housing stock.
8. The Council will not find out whether it has been successful in winning the funding until March 2024 therefore, due to the timing of the pre-election period, to accept the funds and progress the improvements in accordance with the proposed timetable officers have sought delegated authority to accept the funds and incorporate into the capital programme.

Solar Panels on Riverside Leisure Centre

9. Officers have been proactively targeting grants that would meet its aspirations of reducing the carbon emissions attached to its own energy usage. A successful bid has been made to add solar panels at Riverside Leisure Centre.
10. It is anticipated that adding solar panels will reduce 33% in electricity usage and save 82kg CO₂ per annum.

11. The carbon emissions associated with the production and installation of solar PV systems, known as embodied carbon, are typically offset within 2 years of operation. Solar panels have a life span of 25-30 years or more and produce clean energy throughout their operational life. The emissions saved from using solar energy over this period outweighs the emissions produced during manufacturing and installation making them carbon negative.
12. The Council anticipates £53k of savings on operational (utility) costs before the capital financing costs of the scheme.
13. The full cost of the project is £895k for which the Council was successful in achieving £520k of grant, as the grant was not allowed to cover the cost of the canopy upon which the solar panels are situated. Additional council resources of £0.375m are therefore required to allow this proposal to proceed.

Heat Networks

14. It has long been identified that heat networks are a potential low carbon source of energy for Norwich. There are three specific opportunities in Norwich which will likely use large scale heat air pumps, although there are other options in the future such as waste heat from industrial processes.
15. It is important that the Council understands the financial opportunities so that it chooses the best delivery model, which maximises the benefit for the city, its residents and its taxpayers. During this process, there is the potential for the council to invest in the new infrastructure but that will be subject to future rigorous business cases.
16. There is a funding round that is anticipated to take place in June. Due to the timing of the elections (and pre-election period), to access these opportunities, the council is being asked to delegate authority to key officers to pursue these opportunities. The resultant business case will be brought back to Cabinet for future decisions.

Consultation

17. The social housing decarbonisation fund bid has been collaboratively developed across teams with relevant officers and members. Tenants of properties chosen for improvement will be consulted with as part of the project's delivery arrangements.
18. Heat networks will require extensive consultation with key stakeholders, including the county council, local residents and businesses. This would take place post award as part of the feasibility and business planning exercise.
19. Cabinet members will be consulted on the best route forward for Heat Network funding routes once more information is obtained and the business case completed.

Implications

Financial and resources

20. £2.7m of HRA resources would need to be earmarked for providing the match funding for this programme of expenditure. However, most of these energy efficiency measures are assumed to be pursued within the 30-year HRA Business Plan which includes assumptions around government funding and HRA resources to achieve EPC (C) and net zero for its housing stock. Earmarking those resources against this project is achievable within the overall business plan assumptions.
21. The solar panel bid would have a net cost to the authority of £375k but will deliver estimated savings of £53k per year, it has a payback period of 7 years. Net of capital financing costs, it will deliver approximately £25k per year of additional savings on an on-going basis. This can be added to the MTFP, reducing the size of the savings gap.
22. The funding bid for a Heat Networks business case and options appraisals is intended to cover 75% cost of an external party undertaking the work. The council will be undertaking a procurement exercise to establish the most cost-effective option to pursue. At present, early indications are that the maximum cost to the council would be £200k and that would represent bidding for not just the feasibility analysis but a full business case. At this point those resources have not been identified and this must happen before the work is commissioned.

Legal

23. Council has authority to delegate the approval of key decisions to the s151 officer and other Directors to ensure that the projects can be progressed during the pre-election period. Given the timeline of these projects it is not advisable to delay.

Statutory considerations

Equality and diversity	These projects could assist in the equitable access to heat in the long run, affordable access to sports facilities
Health, social and economic impact	The Social Housing Decarbonisation Grant will improve living conditions and health outcomes and reduce energy costs for tenants.
Crime and disorder	N/A
Children and adults safeguarding	N/A
Environmental impact	As set out above.

Risk management

Risk	Consequence	Controls required
<p>Not targeting corporate plan outcomes and achieving net zero in line with the council deadlines.</p> <p>The council needs to manage the contracts carefully as they represent significant resources.</p>	<p>Negatively affecting the reputation of the council.</p> <p>The council has less resources to use for other activities and outcomes.</p>	<p>The risk assessment should consider:</p> <p>the most efficient way to deliver council outcomes.</p> <p>The council has adequate procurement and financial control mechanisms over its capital programme.</p> <p>The council should examine and pursue the most efficient grant arrangement for the heat networks.</p>

Other options considered

24. The Council has considered letting commercial partners take the lead and meet all costs but this creates a risk of sub optimal outcomes for the city and residents and that the council gives away large commercial opportunities for no benefit.

Reasons for the decision/recommendation

25. The recommendation is to delegate the decisions to the relevant officers (in consultation with the relevant portfolio holders) due to the upcoming pre-election period interfering and/or delaying the projects and grant funding opportunities.

Background papers: None

Appendices: None

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Committee name: Cabinet

Committee date: 06/03/2024

Report title: Write-off of irrecoverable debt over £50,000

Portfolio: Councillor Kendrick, Cabinet member for resources

Report from: Interim chief finance officer (S151)

Wards: All wards

OPEN PUBLIC ITEM

KEY DECISION

Purpose

To request write offs for irrecoverable National Non-Domestic Rate (NNDR) debts in excess of £50,000 in accordance with the council's financial regulations, following completion of all available debt recovery options.

Recommendation:

It is recommended to approve write offs totalling £513,479.02 of non-recoverable NNDR debt which is 100% covered within the NNDR bad debt provision.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report meets the Norwich City Council is in good shape to serve the city corporate priority.

This report supports the priority to put the council on a sustainable financial footing and deliver services effectively and efficiently within the Corporate Plan

Report details

1. During the pandemic and the current cost of living crisis, the council has taken a supportive approach to businesses and individuals that owed the council money. This report refers to businesses that owe the council money as commercial customers.
2. For commercial customers, the council implemented measures to help support them during the pandemic including grants, deferring payments due and offering instalment plans where practical to do so before any debt recovery action was taken.
3. In accordance with the council's financial regulations, any debt over £50,000 requires Cabinet approval to write off once all available debt options have been exhausted and the remaining debt is considered to be irrecoverable. This report details customers with debts of over £50,000 that are now deemed to be irrecoverable and therefore need to be written off.
4. Each year, the council sets aside a bad debt provision after reviewing its aged debt profile to cover the event that some debt may become irrecoverable.

National Non-Domestic Rates (NNDR)

5. NNDR is collected by Norwich City Council for businesses within its authority area and shared between Central Government, Norwich City Council and Norfolk County Council. Any NNDR debt written off will also be shared proportionately within the Collection Fund between all parties.
6. There is one customer account with a total outstanding debt of £513,479.02 where the debt recovery procedure has been followed, exhausted and therefore regarded to be irrecoverable. The company concerned has gone into administration and the Official Receiver has confirmed there is no likelihood of a distribution. All of this debt is fully provided for in the NNDR bad debt provision. Appendix 1 provides detail of this customer.

Consultation

7. Consultation on debt write off is undertaken between the service area, legal team and finance team in accordance with the council's debt recovery policy and procedures. Debt will only be written off when all debt recovery including legal options have been exhausted. The relevant portfolio holder is also advised of the write-off request.

Implications

Financial and resources

8. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.
9. There are no proposals in this report that would reduce or increase resources.

Legal

10. nplaw have been engaged to provide legal advice and legal debt recovery action on each customer debt in accordance with relevant legislation.
11. This report may be considered in the public domain as the information relates to company information that is already publicly available through Companies House.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	None
Health, social and economic impact	None
Crime and disorder	None
Children and adults safeguarding	None
Environmental impact	None

Risk management

Risk	Consequence	Controls required
The failure to collect monies owed from customers could lead to financial, operational and reputation risk for the council	Non-payment by customers, non-compliance with operational procedures and reputational risk. Insufficient bad-debt provision.	Adherence to financial regulations and debt management procedures Supporting businesses with debt management advice including the use of third-party advisors.

Other options considered

12. None. The debt recovery process has been followed.

Reasons for the decision/recommendation

13. The council seeks to recover all aged debt following its debt recovery processes. Once all debt recovery options have been exhausted, the debt is regarded irrecoverable and requires to be written off. For all customer debt over £50,000, the decision to write off is approved by Cabinet.

Background papers: None

Appendices: Appendix 1- Schedule of Irrecoverable Debt

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Appendix 1- Schedule of Irrecoverable Debt

Business Rates (NNDR)

Reference	Account name	Reason for write off request	Amount (£)	Type of Debt
936132X 941717X 9361341 9362279 9362420 9362431 9421039 9421932 9449558 9466293 9466674 9473618 9476486 9487954 9482732 9483441 9484782 9491726 9492337 9503173 9517650 9519079 9527974 9529991 9489078 9510738 953456X 9534940 9536434 953698X 9574667	Infrared Uk Retail Nominee 3 Ltd & Infrared Uk Retail Nominee 4 Ltd	Winding up commenced 19/4/21 and concluded 6/12/22- due to be dissolved 17/2/25 We have submitted our claim however the Official Receiver advises no likelihood of any distribution	513,479.02	NNDR



Committee name: Cabinet

Committee date: 06/03/2024

Report title: **Contract award for the main contractor for the development at Argyle Street**

Portfolio: Councillor Jones, Deputy leader and cabinet member for housing and community safety

Report from: Executive director of development and city services

Wards: Mancroft

OPEN PUBLIC ITEM

KEY DECISION

Purpose

To consider the award of a contract relating to the construction of 14 new homes at Argyle Street, Norwich.

Recommendation:

- To agree to award the contract **for construction of the 14 homes** to Marfleet and Blyth Ltd; and
- To agree to utilise £729,166 S106 affordable housing commuted sum towards this development.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

The report addresses the first three of these priorities.

This report addresses *Great neighbourhoods, housing and environment* corporate

priority or action in the Corporate Plan.

This report helps to meet *Build and maintain a range of good quality affordable and social housing* adopted policy of the Council.

This report helps to meet *Housing, regeneration and development* objective of the COVID-19 Recovery Plan.

Report details

1. Following the demolition of council houses in 2015, the land at Argyle Street has remained vacant. Ownership of the site has been retained within the Council's Housing Revenue Account identified within the housing pipeline, with costs of redevelopment included within the agreed HRA business plan.
2. The land is situated in Norwich City centre, close to amenities offered on the Riverside.
3. The site has known complexities in its ground conditions associated with historic mining. These add to development costs. A strategy of remediation of the ground using recycled materials from other developments within the city is proposed. This is considered to be the most sustainable approach available to remediation.
4. The scheme proposed is modelled to deliver 100% social housing, creating 14 new highly energy efficient properties built to national described space standards. It comprises 6 1-bed flats, 3 2-bed houses, 2 3-bed houses and 3 4 bed houses. The development will incorporate 9 parking spaces.
5. Planning permission for the development was granted on 8th November 2023 (application 22/00273/F). The development will be water efficient but nevertheless it utilises credits from the Council's own nutrient neutrality mitigation scheme to demonstrate that it will not add to problems of phosphate and nitrogen in the rivers Wensum and Yare.

Procurement process

6. The Project's procurement is deemed to be works with a value below the £5,336,937 (inc. VAT) Public Contract Regulations threshold for works (PCR threshold).
7. The Councils constitutional Contract Procedures requires that contract values between £100k and the PCR threshold are managed by the Procurement Service and the route must be quotations or tenders (ideally open) with at least three to be sought from preferred suppliers, or through a framework.
8. In this instance the following procurement options were considered:
 - (a) Do Nothing: If the Project is not carried out then 14 additional homes will not be added to the social housing portfolio and its additional benefits will not be achieved. This option was not pursued for this reason.
 - (b) In-House Provision: The Council does not have any existing in-house resources. This option was not pursued for this reason.

- (c) Joint Venture with Norwich City Services Ltd (NSCL) to deliver the Project: There are no opportunities for NCSL to deliver this for the council. This option was not pursued for this reason.
- (d) Identify a single supplier to award the Contract to without competition: This route would be contrary to the Council's Contract Procedures as the value is approximately £3.1m and so over the £100k value. This option was not pursued for this reason.
- (e) Utilise an existing Framework: An extensive appraisal of Frameworks was conducted assessing local suppliers and framework rates charged to suppliers. Two frameworks appear to provide the most commercial benefits to the Council.
- Crown Commercial Service RM6088 Construction Works and Associated Services (1 local supplier)
 - Places for People procurement hub Development Contractors Dynamic Purchasing System (ability to limit opportunity to region and add local suppliers)
- (f) Whilst Frameworks can provide an effective, compliant, and quick route to market, with cost benefits of aggregation, this option may exclude many smaller suppliers in local area. As the development was potentially well suited for local small to medium sized builders to tackle this option was not pursued.
- (g) **Establish a competitively tendered Contract via open procedure:** Run an open and competitive procurement exercise. This would encourage competition and is the Council's preferred route to market for contracts with a value in excess of £100k and may drive down and encourage efficient pricing in the bidding process.

However, an open tender could negatively impact timescales at the evaluation stage. It is believed that this route could be suited to larger national companies whose pricing points are achieved through economies of scale, negatively impacting small and local suppliers. This option was not pursued for this reason.

- (h) **Establish competitively tendered Contract, inviting five local suppliers to bid.** The council's constitutional contract procedures allows a restricted quote procedure for contract values below the PCR threshold. By waiving the open procedure route we are able to limit the opportunity to a handful of suppliers within the East of England. Additional value to the procurement process and supplier selection:
- Opportunity to stimulate local markets, and reach local SMEs and further building on the social value benefits of this project.
 - Local market knowledge will be used to identify competent and capable suppliers to enter the bidding process, informal

expressions of interest have been sent to 6 suppliers. 5 responded positively expressing an interest in bidding.

- Previous tenders identified that we can strengthen evaluation with robust clarifications on pricing, quality and in-depth financial analysis of the winning tenderer- limiting the number of local suppliers allows sufficient time to achieve this
- Competitive pricing is still achieved through the bidding process and through our price quality weighting.

This was the procurement route taken.

9. The specification and tender documents were developed by the Employers Agents in consultation with the Council's Housing Delivery Team, Procurement Team and nplaw. The tender pack was issued on 29th November 2023 via the council's e-tendering portal.
10. The evaluation criteria was on a 50% quality and 50% price split. This approach was considered to be the best way to encourage competitive pricing whilst ensuring that considerable social value was also delivered.
11. Following the tender submission deadline, the Council received only 1 bid, and this was from Marfleet and Blyth Limited. The other 4 companies who were approached failed to submit tenders, notwithstanding their previous stated intention to do so. They have been approached to understand the reasons for non-submission. Workload, subcontractor risk and contract risk were cited as the reasons. As two of these withdrew late in the tender period there was limited opportunity to consider whether to revisit the tender process.
12. Evaluation has been carried out on the single tender submission received. This scored 31 points out of a possible 50 for quality demonstrating the Marfleet and Blyth Ltd will be able to meet the Council's requirements. With regard to price scoring as there was only one bidder Marfleet and Blyth Ltd score 50 out of 50. It should also be noted the submission price is £3,192,567.93 ex VAT which is within the budget envelope for this project (see financial implications below). Overall Marfleet and Blyth scored 81 out of a possible 100 points under the assessment completed.
13. Marfleet and Blyth Limited is considered financially sound following due diligence. A Dunn and Bradstreet report has been obtained.
14. In light of the above and in order to avoid the delay and costs associated with any retendering exercise it is recommended that the contract is awarded to Marfleet and Blyth Ltd. Development should commence in the autumn.

Consultation

15. Previous consultation took place as part of the planning phase of the project. Consultation was not relevant to the procurement of the construction contractor.

Financial and resources

16. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2022-26 and budget.
17. As a result of the proposed development the taxbase is likely to increase, however the impact on Council finances cannot be calculated at this time as it will depend on the number of Band D equivalents these properties equate to, and any discounts or reductions the property/residents may be entitled to. Depending on the completion date, the full potential increase will not take effect until the financial year following completion (2026/27).
18. Full Council approved the Capital and Commercial strategy, a 5-year strategy and capital budget for the development of the project on 21 February 2023. The budget for this was £3.675m from 2023/2024, in addition to circa £0.194m which had been spent to date, allowing a total budget for the scheme of circa £3.869m.
19. Officers have modelled the costs for the financial business case. The project is deliverable within the current approved budget of £3.869m and within the overall HRA business plan. This is the total of all costs including design, construction, contingency and management of the development.
20. The associated development costs as well as the development contingency 15%(£0.475m) is included within the budget due to the nature of the ground conditions. It is recommended that the full budget of £3.869m, including the contingency, is retained at the present time to mitigate against unforeseen construction costs and this will be monitored throughout the development by the Delivery team.
21. The modelling shows that, utilising the grant funding and retained RTB receipts detailed below, a payback period of 29.5 years is achieved at social rents and an assumed HRA business plan borrowing rate of 3.7%. If affordable rents were charged, capped at LHA rates the payback period would reduce to 21.3 years. The development is included within the approved HRA business plan and this payback period means the development has a positive effect upon the plan. No final decision has yet been made on the rent level.
22. For this development, 40% of the total cost will be met by Retained Right to Buy receipts to the value of circa £1.5m. The continuation of this project reduces the risk of having to pay retained RTB receipts to central Government that are currently held for this project and associated interest at base rate plus 4%
23. In addition, the council secured £0.15m from the Governments Brownfield Land Release Fund and this report is seeking approval for the use of c£0.729m S106 affordable housing commuted sum held from the development of Wherry Road (Planning application 11/02236/F). This commuted sum was received in February 2017 and must be used within 1km of the site and within 10 years.
24. Costs have been incurred to date of c£0.194m for delivery of the planning strategy, development design costs, and employer's agent / quantity surveying fees. Should the project not proceed these will become abortive costs and

there is a risk that these costs may not be capitalised and become revenue costs to the HRA.

Legal

25. The contract will be subject to a standard JCT terms and conditions, nplaw will be involved in the detailed drafting of the contract.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	Neutral Impact
Health, social and economic impact	Positive impact – the development will comprise of 14 new highly energy-efficient homes with access to a wide landscaped public walkway for the community linking directly to the public play area.
Crime and disorder	Positive impact – The opening up of the play area into the development reduces hidden areas where anti-social behavior can occur.
Children and adults safeguarding	Positive impact – Each apartment will have their own front door, generous lobby space and private balcony. The 4 bed properties will share a ginnel for children to play together.
Environmental impact	<p>The delivery of 14 new homes using a fabric first approach designed to high environmental and sustainable standards working towards a net zero approach.</p> <p>Parking provisions have been pushed to the perimeter, so that streets feel safe and ‘owned’ by pedestrians rather than cars.</p> <p>Solar panels will be installed enabling home user generated electricity to power sustainable sources such as air source heat pumps, and underfloor heating.</p> <p>The use of redundant materials from other council sites can be utilized to reduce waste and cost for land remediation works.</p>

Risk management

Risk	Consequence	Controls required
Program delays (e.g., arising from the incorporation of any required design changes) (M)	May result in increased costs and/or threaten delivery deadlines.	<p>Detailed design information has been produced by client team ahead of tender and detailed specification produced to reduce the need for changes.</p> <p>Some detailed design changes may be required post tender.</p> <p>A contingency budget is maintained.</p>
Brief (i.e., scope creep (e.g., the incorporation of any brief changes)) (M)	May result in increased costs and/or threaten delivery deadlines.	<p>Employers Agent to administer contract to ensure any changes are valid and assess impact of any proposed changes and seek Client instructions.</p> <p>A contingency budget is maintained.</p>
New building regulations are not achieved with current design leading to changes. (M)	Potential additional costs would be incurred.	<p>Part O assessment has been carried out on the current tender designs to ensure compliance. Other regulations such as part L will be achieved during the detailed design.</p> <p>A contingency budget is maintained.</p>
The lack of certain construction materials and/or labor. (M)	May give rise to additional costs and/or cause delay.	<p>Establish early warning system with contractor early in the construction stage.</p> <p>A contingency budget is maintained.</p>

Other options considered

26. Not to let the contract. This would have the advantage of allowing a wider range of potential bidders to submit tenders to undertake the work. Whilst this is likely to result in a greater range of contractors engaging in the process and therefore may reduce the costs of the build. There would be a minimum delay of 4 months to retender the projects which will delay the provision of much

needed affordable housing. There is also a risk that if the project is retendered prices will increase.

Reasons for the decision/recommendation

27. Following the issuing of expressions of interest to 5 contractors, only 1 contractor was successful in completing the tender return. The reasons for this were related to the complexity of the site and its existing ground conditions and the city centre location adding additional risk to the contractor. With this in mind, a rigorous evaluation process was undertaken to establish both quality in the response and value for money.
28. To demonstrate value for money, the appointed Employers Agent, Oxbury, undertook a review of the costings of the Marfleet and Blyth submission. This included benchmarking costs against comparator schemes. It concluded that the construction cost per m² (of £2,439 m²) represented good value for money.
29. The quality of the tender submission was considered good. The questions focused on experience and collaboration, social value (such as local economy, local labour and education), logistics, build and programme, Health, Safety and risk and Building Safety.
30. The contractor has demonstrated specific social value benefits including; inviting schools and colleges to site to help educate students about the construction industry; allowing local business to promote their services on site; providing skips and taking part in community tidy up activities; providing building materials for community projects. They also will offer staff two volunteering days per year allowing them to make engagement with local community in projects of their choice.
31. It is therefore recommended to award the construction contract to Marfleet and Blyth Ltd.

Background papers: None

Appendices: None

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Committee Name: Cabinet

Committee Date: 06/03/2024

Report title: Assets (Non-Housing) Five Year Plan

Portfolio: Councillor Kendrick, Cabinet member for resources

Report from: Interim Executive Director of Major Projects

Wards: All Wards

OPEN PUBLIC ITEM

KEY DECISION

Purpose

To consider the Investment Portfolio Strategy & Implementation plan and endorse the revised asset management action plan appended to this report.

Recommendation:

To:

- (1) Endorse the revised asset management action plan appended to this report;
- (2) Endorse the governance arrangements for management of the non-housing property portfolio;
- (3) Delegate the disposal of the assets listed within the exempt appendix to the Executive Director of Development & City Services in consultation with the S151 officer and cabinet member for resources;
- (4) Agree to the use of the Commercial Property Reserve to fund condition surveys & rent reviews relating to assets listed within the exempt appendix; and
- (5) To note that there will be a report to cabinet in 12 months time to report on progress and consider additional disposals in later years of the plan.

Policy Framework

The Council has five corporate aims, which are:

- People live independently and well in a diverse and safe city.

- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report meets the aim of Norwich City Council being in a good shape to serve the city. The proactive management of the Council's investment portfolio is essential to ensure that it delivers a viable and sustainable return to the council in order to help deliver front line services.

Report Details

Background

1. The council's [Strategic Asset Management Framework \(SAMF\)](#) was adopted in March 2022. This sets out the asset management policy, strategy and action plan for managing the non-housing property portfolio. Substantial progress has been made over the past two years in taking a more proactive approach to the management of the council's property assets.
2. Key achievements since the adoption of the SAMF have been:
 - a. services have been insourced with staff transferring in from NPSN with successful continuing service provision;
 - b. there has been a full restructure of the team managing the non-housing portfolio, leading to a more robust service structure to manage the portfolio;
 - c. the Norwich Airport Industrial Estate has been sold for £35.75m;
 - d. a full audit of compliance information and responsibilities ensuring there is a clear record and audit of compliance activities and actions across the portfolio reporting through to the compliance board;
 - e. income targets for investment properties have exceeded targets;
 - f. more proactive management of commercial property debt in line with performance standards;
 - g. improved condition and valuation data on a large number of high priority assets leading to asset reviews and decisions to dispose of a number of assets;
 - h. sale of 163 Cambridge Science Park for £12.17m;
 - i. implementation of a new IT system to hold non-housing estate management data.
3. Significant progress has been made to start to build an accurate view of our asset portfolio, however there remains a need to improve data and have an updated action plan particularly around the income earning portfolio. A business case was approved by the Future Shape Norwich (FSN) Board in summer 2023 with the aim to achieve an ongoing cycle of data gathering, decisions and action so that the portfolio is effectively challenged, proactively managed and data on our assets is kept accurate and up to date. The objectives of this piece of work were to develop a 5-year plan to inform the Medium Term Financial Plan (MTFP), put resources in place to enable the 5 year plan to be taken forward as part of business as usual, put governance arrangements in place to allow decision making and reporting of progress against the plan.
4. In order to take this forward Jones Lang LaSalle (JLL) were appointed to undertake a strategic review of the council's income earning assets and to assist in developing an implementation plan covering the next 5 years to inform and align with the MTFP. This review excludes the HRA shops. JLL's work forms the basis of a new action plan to inform estate management over the next five years.

Summary of JLL Findings

5. The property investment portfolio is characterised by its capital distribution. It can be regarded as having a large head and a long tail caused through an imbalance of capital deployed. The weighting of the portfolio is such that 80% of the capital is held in 23% (17) assets (large head), with 45% (32) assets accounting for just 5.9% (long tail) of the invested capital. The revenue generated from the portfolio is broadly aligned to the capital distribution.
6. This imbalance leads to inefficiency and poor investment performance. Management time and cost is disproportionately spent on the smaller and predominantly weaker assets. This further accentuates poor relative portfolio performance through lower capital and rental growth, the long tail forming a drag on investment returns. Smaller assets also provide a low relative contribution to overall portfolio performance.
7. The current property investment portfolio comprises 72 assets (using the smallest denominator). These assets have a book value of £87m producing an annual income of c£5.6m. The portfolio has around 170 tenants.
8. The portfolio holds a high level of liabilities for both repairs, maintenance, and future sustainability requirements. This is accentuated by a large holding of listed historical buildings accounting for 36% of the portfolio by asset number. Total repairing liabilities from the existing portfolio are estimated to be more than £35m.
9. JLL have identified a need for a more effective deployment of capital to support longer term revenue generation and growth. This can be achieved by streamlining the investment portfolio through an orderly disposal of under-performing property assets, focussed on reducing the long tail.
10. JLL have suggested that capital receipts could be used as a source of funding for future investment in either existing assets or new modern environmentally sustainable property investments, subject to them generating an appropriate return and being in line with the capital financing regulations. However, the councils general approach would be to reduce its debt or generate treasury returns with agreed property investments funded in accordance with the councils commercial strategy.
11. Through a systematic and orderly disposal and re-investment programme the council can reduce its exposure to capital liabilities through a combination of selling properties with inherent liabilities and investing in either existing buildings held as long-term holdings or modern/new investments.
12. For the residual portfolio, strategic capital investment will add longer term value and support future economic re-generation within the city. To implement this, individual asset reviews and business plans with appropriate planned maintenance programmes should be developed with a five-year time horizon to align with the Council's MTFP and over-arching objectives. Those plans will be informed by accurate condition data and environmental improvement plans.
13. JLL have identified assets which form the basis of a five-year implementation

plan for disposal and raising capital receipts. These are detailed within the exempt appendix. The program will achieve the objectives of reducing inherent repair liabilities and drive the efficient and effective deployment of capital to enhance returns and portfolio performance. By systematically reducing the weaker and under-performing assets the portfolio will be positioned to generate longer term sustainable revenue and capital growth.

Strategic Asset Management Action Plan

14. In line with the advice from JLL a revised SAMF action plan has been drafted to guide asset disposals as well as the proactive management of the remaining portfolio. This is organised into four sections as follows:
 - a. Data – commissioning of improved data on retained assets including condition surveys and energy efficiency improvement plans along with reinstatement valuations. This will allow for more detailed asset review and investment plans to be prepared for retained assets.
 - b. Repairs & Maintenance – improved condition data on assets will bring to light immediate repair requirements, these will need to be scheduled in and actioned on receipt of condition reports.
 - c. Asset Management – the action plan lists a number of actions to ensure the proactive management of assets. This includes the detailed evaluation of assets identified for disposal in this report as well as a list of assets for more detailed asset review. Further detail is within the exempt appendix.
 - d. Systems – a new asset management system has been launched in January 2024. There are a number of stages of development of this system, the detail and timescales for this are being pulled together in a new business case to guide this work.
15. The action plan sets out timescales for action and links to asset schedules which are contained in the exempt appendix.
16. The delivery of the action plan will also lead to capital investment plans for existing retained assets. It is proposed to obtain a full suite of condition data and environmental improvement plans (where these are lacking) in year 1. Such data will inform more detailed asset reviews on retained assets in order to inform capital investment plans to improve the condition and environmental performance of retained assets. This will be essential to reduce responsive repair costs going forward and will ensure the sustainability of income from assets in the medium to long term.

Governance

17. In order to monitor delivery, it is proposed to set up an Asset & Development Board. This board will:
 - a. Monitor implementation of the Asset Management Strategy & Action Plan;
 - b. Consider asset reviews
 - c. Consider asset disposal's
 - d. Monitor asset performance
 - e. Consider lease events >£500k value over 5 years
 - f. Monitor the progress of the development pipeline sites (see associated cabinet report relating to the development site pipeline)

18. In relation to any new capital expenditure on existing assets. The Asset & Development Board will make recommendations to the Capital Board who will consider inclusion within the wider capital programme to ensure affordability, borrowing capacity and rate of return. If approved by capital board the usual governance arrangements in relation to cabinet and full council will remain.
19. The board will monitor progress and undertake updates to the plan as necessary with bi-annual updates as part of financial monitoring reports to cabinet.
20. Further detail on the role of this board in relation to disposals is outlined below.

Asset Disposals

21. In order to manage the disposal of assets it is proposed to delegate the disposal of assets listed in the exempt appendix to the Executive Director of Development & City Services in consultation with the S151 officer and the cabinet member for resources. At this stage it is proposed to delegate authority for disposal of 8 assets in year 1 of the five year plan. This is in addition to 5 assets where disposals are being progressed in year 1 and for which a resolution to dispose has already been given by cabinet. Assets in the latter stages of the JLL plan will be subject to a more detailed review and subsequent report/s to cabinet seeking authority to dispose. These have been built into the asset review lists in the exempt appendix. A report on progress and to consider any additional disposals will be brought to cabinet on 12 months time.
22. Assets which once competitively marketed fail to achieve bids in line with the estimates in the exempt appendix, unless de-minimis, will be subject to further review. The figures for estimated capital value in the exempt appendix are estimates based on income yield and not formal red book valuations which take account of asset condition. Therefore, in such circumstances an external red book valuation would be sought to gain a more accurate valuation. If bids are below 90% of a red book valuation any decision to continue to dispose of the asset will be subject to a further report to cabinet.
23. Assets for which delegated authority to dispose is granted will be subject to a further review ahead of disposal with a report to the Asset & Development Board to allow a final decision. That report will consider any implications for existing tenants, the most appropriate method of disposal, which could include auction, and how best value considerations will be achieved.

Financial and Resource issues

24. Asset management decisions must be made within the context of the council's priorities, as set out in its Corporate Plan and the Medium-Term Financial Plan.
25. Assets identified for disposal have the potential to raise £3.34m in capital receipts and reduce a minimum of £1.8m in capital liabilities, which would have increased borrowing requirements but at the cost of £204k rental income.

26. JLL recommend recycling of capital receipts into property. However, as a matter of course, the Council will automatically apply investment property capital receipts against debt, reducing capital financing charges in the short term (minimum revenue provision and interest payable) before making a decision on whether to re-invest.
27. At current interest rates, this could generate more than £170k in treasury returns based on 5% plus interest rates, although our treasury management advisors forecast lower interest rates going forward.
28. Whether the Council reinvests into existing properties will be made on a case-by-case basis. However, it is expected the remaining assets would have many investment options capable of realising an enhanced investment return. In the meanwhile, the council would still have that cash to generate treasury returns, protecting the revenue budget overall.
29. Upcoming rent reviews should increase rents by £660k, as detailed in the exempt appendix. The new board will monitor revenue performance.
30. External consultancy costs will be managed within the property services budget but if this does not prove to be possible the commercial property reserve is available to cover any shortfall.
31. Asset disposals will be managed in house by existing resource. Agents will typically be used for marketing and this cost along with any legal fees will be set against the capital receipt, subject to a limit of 4% in line with guidance.
32. A more detailed summary at individual asset level is provided in the exempt appendix.

Legal issues

33. By virtue of section 123 of the Local Government Act 1972 the city council has the necessary statutory powers to dispose of its land. This section also states that on a disposal, the council are under a statutory obligation to obtain the best consideration that can reasonably be obtained for the land.
34. Best consideration will typically be achieved via a competitive marketing process. In cases where there is a proposed sale to a 'special purchaser' due to the ability to realise a marriage value, these will be subject to a red book valuation to ensure that there is an uplift above market value.
35. Achieving best consideration will also ensure that the council is not caught by the subsidy control regime.
36. Section 122(1) of the Local Government Act 1972 states that local authorities have a general power of appropriation for land or property which is no longer needed for the purpose its held: *'a principal council may appropriate for any purpose for which the council are authorised by this or any other enactment to acquire land by agreement any land which belongs to the council and is no longer required for the purpose for which it is held immediately before the*

appropriation' but subject to the rights of other persons in or over the land.

37. This general power is subject to the provisions of section 19(2) of the Housing Act 1985. This states that if property is being used for housing accommodation, the consent of the Secretary of State is required if the property is to be disposed of or otherwise taken out of the Housing Revenue Account. This section only applies to properties used partly or wholly for housing, including yards, gardens and outhouses.

38. This section only applies to properties used partly or wholly for housing, including yards, gardens and outhouses so land or property used solely as garages would not therefore be caught by this requirement. Accordingly, Secretary of State consent would not be required here and section 122(1) (as above) would allow the Council to dispose of the land.

39. None of the sites identified for disposal include any form of open space land and therefore section 123(2A) of the Local Government Act is not considered to apply.

Statutory Considerations

Consideration	Details of any implications and proposed measures to address:
Equality and Diversity	Sale of the assets will result in the transfer of the freehold interest, but this is not anticipated to have any material equality and diversity implications.
Health, Social and Economic Impact	There are no direct consequences flowing from these proposals.
Crime and Disorder	There are no direct consequences flowing from these proposals. Albeit some of the properties in question are vacant and therefore can be targets for crime and disorder. The decision to dispose should assist in bringing the assets back into use.
Children and Adults Safeguarding	Not applicable
Environmental Impact	Gaining better condition and environmental performance data on assets will allow for assets reviews and capital investment plans to be produced which will allow for enhance environmental performance of retained assets.

Risk Management

Risk	Consequence	Controls Required
Inability to dispose of the asset for the capital values identified.	Reduced capital receipts.	This will be monitored by the board and the action plan will be updated. A further asset review will be undertaken for assets which fail to sell on the open market.
Deterioration of market interest for this property type	We are unable to generate interest for this building and worsen our position.	This will be monitored by the asset & development board. There will need to be flexibility over the exact timing of disposals to guard against this and the board will also consider the best method of disposal to realise a sale and maximise a return.
Substantial liabilities are identified in retained assets via new condition data.	Increase capital costs of maintaining the asset v. revenue loss of disposal.	Retained assets will be subject to a detailed asset review to consider best outcomes and this will include consideration of the implications cumulatively across the portfolio.

Reasons for the decision/recommendation

40. The recommendations within this report are aimed at ensuring the continued proactive management of our property assets. This builds on the substantial achievements made over the past 2 years and as set out in this report. Setting out a clear policy for assets, understanding why we own them and how they contribute to corporate objectives, having a framework for challenging assets and an action plan for service transformation is the best way of maximising the use of our property assets. The investment portfolio plays a key role in helping to fund front line services and our proactive management of the portfolio will ensure that this is sustainable into the future.

Background papers:

Appendices:

Revised SAMF Action Plan
Exempt Appendix

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Norwich City Council Strategic Asset Management Framework Action Plan - Updated March 2024

Ref.	Specific	Comment	Measurable			Responsible Department	Attainable	Relevant			Time-Based
	Key Actions		Baseline Data	Governance	Measurement of Success		Financial / Resources	Key Drivers	Priority H/M/L	Impact H/M/L	Delivery Timescale
Data											
Ai	Commission condition surveys / EPC improvement reports	Gain for all assets envisaged to be retained as part of the 5 year plan.	Detailed asset schedule	Asset & Development Commissioning Board	Condition data for all assets to be retained	Property Operations Team	External consultant - £125k Budget Requirement	Understand liabilities - financial resilience	H	M	Q3 24/25
Aii	Insurance Reinstatement Valuations	5 year plan of reinstatement valuations - agreed as part of recent insurance tender	Reinstatement valuation program	Asset & Development Commissioning Board	Valuations received as per program	Property Operations Team	External consultant - circa £70k pa	Mitigate risk of underinsured premises	M	M	As per five year program
Repairs & Maintenance											
Bi	Undertake priority repairs / capital works	Works needed for H&S reasons / preventative maintenance identified in Condition Data	Informed by Ai	Health & Safety Board	Works complete	Property Operations Team	Potential for increased repairs and maintenance costs across portfolio - proposed use of commercial property reserve for any overspend where required.	Legal compliance / H&S / preventative Maintenance	H	H	Q4 24/25
Asset Management											
Ci	Undertake emerging rent reviews	Undertake rent reviews	Detailed asset schedule	Asset & Development Commissioning Board	Completion of rent reviews in line with schedule	Strategic Asset Management Team	External agency support will be used where it is likely to realise a greater uplift - budget estimate £67k	Financial resilience - income generation	M	M	Detailed asset schedule
Cii	Detailed evaluation of disposal assets for Board decision	Undertake a detailed review of disposal assets in year for decision of Board	Detailed asset schedule	Asset & Development Commissioning Board	Asset disposal decisions in line with schedule / successful disposal	Strategic Asset Management Team	Internal by Strategic Asset Management Team	Financial resilience - capital receipts	M	M	Detailed asset schedule
Ciii	Asset reviews for retention assets	Undertake detailed review of assets identified for retention in the five year plan	Informed by Ai	Asset & Development Commissioning Board	Completed review and outcome in line with schedule	Strategic Asset Management Team	Internal by Strategic Asset Management Team	Financial sustainability - proactive asset management	M	M	Detailed asset schedule
Civ	Develop capital investment strategy for retention assets	Capital strategy for asset disposal and capital expenditure on assets 2022-2023	Based on outcomes of Ai & Ciii	Capital Working Group / Capital Board	Capital strategy adopted by Cabinet	Property Operations Team	Property Team working with Finance	Financial resilience - Capital Strategy	M	M	Q4 24/25
Cv	Base budget review including consideration of sinking funds for remaining portfolio	Based on understanding of condition liability data and capital strategy	Data from Ai & Ciii	Asset & Development Commissioning Board	Funds established	Strategic Asset Management Team	Property Team working with Finance	Financial resilience	M	M	Q4 24/25
Systems											
Di	System Development & Process and Procedure Updates	Development of CIPFA Asset Manager system implemented in Jan 24 - to implement capital accounting and repairs and maintenance modules with associated procedures.	Current State Processes which have been mapped	Major Projects Directorate Board	Implementation in line with business case	Strategic Asset Management Team	Resource considered as part of business case	Financial resilience	M	M	As per business case to be signed off by Q1 24/25



Committee name: Cabinet

Committee date: 06/03/2024

Report title: Development Site Pipeline

Portfolio: Councillor Kendrick, Cabinet member for resources

Report from: Interim Executive Director of Major Projects

Wards: All Wards

OPEN PUBLIC ITEM

KEY DECISION

Purpose

To consider the development site pipeline.

Recommendation:

To:

- 1) Note the progress on the development site pipeline work;
- 2) Delegate the disposal of the assets listed within the exempt appendix to the executive director of development and city services, in consultation with the Section 151 officer and cabinet member for resources; and

To recommend to council:

- 3) The adjustment to the 2024/25 capital programme, to fund further design, feasibility and infrastructure works to the sites detailed in the exempt appendix to this report.

Policy framework

The council has five corporate priorities, which are:

- People live independently and well in a diverse and safe city.
- Norwich is a sustainable and healthy city.
- Norwich has the infrastructure and housing it needs to be a successful city.
- The city has an inclusive economy in which residents have equal opportunity to flourish.
- Norwich City Council is in good shape to serve the city.

This report meets the 'Norwich has the infrastructure and housing it needs to be a successful city' corporate priority.

This report addresses 'Review potential development sites to improve their management and develop a pipeline of potential housing development sites' priority in the Corporate Plan

This report helps to meet the strategic asset management framework and the council housing strategy, adopted policy of the Council.

Report details

Background

1. The Corporate Plan 2022-2026 identified a key action to review potential council-owned development sites, including surface car parks, to improve their management, to develop a pipeline of potential housing development opportunities, and unlock revenue opportunities.
2. This action is underpinned by the strategic asset management framework of the council, which seeks to make the most of its own land holdings and financial capability to maximise rates of housing delivery through exemplary homes that meet the needs of the people of Norwich and develop a pipeline of development sites that can be delivered over the medium to long-term.
3. On 14 December 2022 cabinet endorsed Phase 1 of development site pipeline work, carried out by Bidwells, and approved further detailed feasibility work to be undertaken. Phase 1 included a market commentary on potential uses, a review of existing information on the sites, an initial assessment of the optimum use of the site and an initial valuation of the land.
4. Significant work has now been undertaken as part of phase 2 by Bidwells in partnership with Ingleton Wood architects and has included:
 - a. Detailed feasibility work on the potential of the site.
 - b. Design work to consider type, massing and scale of development that can be achieved on the site.
 - c. Full Red Book Valuations of sites.
 - d. Prioritisation of sites to be taken forward either for development or disposal.

Summary of Bidwells' report

5. Phase 2 work has identified the priority sites. The information is commercially sensitive, so at this time the sites will remain confidential, but each site will be subject to further consideration under the delegated authority sought in this report to determine the future use or disposal.
6. Based upon the advice, some sites would be more suited to disposal to the wider market, and this could generate significant capital receipts to the council.
7. Of the 15 original pipeline sites the feasibility work has identified 4 as priority sites for disposal, 1 for wider land assembly before consideration of disposal and 2 sites for further feasibility / business case development for the council to deliver for commercial development.
8. The remaining 8 sites require further investigation and feasibility work to be undertaken before determining the preferred decision for the future.
9. The advice received from Bidwells shows a potential for delivery of between 830 and 1200 new homes across the priority sites along with approx. 70,000 sq ft of light industrial development for letting that would support economic growth as well as revenue returns.

10. Two further sites which were not in the original pipeline are also included in the exempt appendix following recent work. One we are seeking additional budget for further design and feasibility studies and one we are seeking delegated authority to dispose, subject to full business case and achieving best consideration.

Asset Disposals

11. As outlined in the Assets Five Year Plan report earlier on this agenda, to manage the disposal of assets an Asset & Development Board has been established to oversee proposals for the development pipeline.
12. The decision to dispose of land, detailed in the exempt appendix will be delegated to the executive director of development and city services, in consultation with the Section 151 officer and cabinet member for resources. The exception to this will be a site detailed in the exempt appendix which following a marketing exercise will be subject to further consideration by cabinet due to the scale of potential capital receipt.
13. Assets for which delegated authority to dispose is granted will be subject to a further review ahead of disposal with a report to the Asset & Development Board to allow a final decision. That report will also consider the most appropriate method of disposal and marketing strategy, which could include Lion Homes, and how best value considerations will be achieved.
14. Assets recommended for disposal in this report have the potential to raise c£5.54m in capital receipts and will be taken forward in the 2024/25 financial year.
15. Assets which, once competitively marketed, have bids that fail to achieve at least 90% of a red book valuation will be subject to further consideration by the Asset & Development Board for revised marketing or a further report to cabinet for a decision to proceed.
16. As detailed in the Managing Assets report, there is a need for a more effective deployment of capital to support longer term revenue generation and growth. This can be supported through an orderly disposal of property assets including those detailed in this report. Consideration would be given to not affecting land values by disposing of all the assets at one time.
17. However, generally, the Council will apply property capital receipts against debt. All future investment decisions are made on the basis as to whether the council would borrow for them. This is in line with CIPFA's best practice for holding and investing in investment properties.
18. Asset disposals will be managed in house by existing resource. Agents will typically be used for marketing, and this cost along with any legal fees will be set against the capital receipt, subject to a limit of 4% in line with guidance.

Investing in new development

19. The financing of assets and decisions to invest are separate decisions, particularly within the local government framework, where there are statutory charges (Minimum Revenue Provision) against the underlying need to borrow.

20. All decisions to invest in development of new commercial assets will be compared against investment hurdle rates, which would be slightly above 5% in today's current environment. The council will assess options for more detailed metrics, but the return required would be expected to cover repayment of principal and interest.
21. Following more detailed work some sites may be suitable for development through a range of delivery methods including those led by the council. Any development by the council will be subject to detailed business case and further cabinet and council approval for the budget, should this be the preferred option for a particular site.
22. Based upon the initial advice some sites would be more suited to disposal to the wider market, and this could generate significant capital receipts to the council. Some properties are generating an income and there should also be an underpinning strategy to understand the extent to which that revenue stream could be replaced to avoid undermining the council's revenue budget. There are also likely to be a range of capital and revenue costs associated with individual properties.
23. Assets recommended for light industrial development have the potential to generate £0.7m per annum in revenue.
24. Development of new assets for commercial purposes would generate additional business rates and any growth in residential development would also increase the council tax base for the council.
25. When sites are brought forward it is therefore important the total financial impact is understood and taken into account as part of the decision-making processes.

Consultation

26. The relevant portfolio holders have been briefed on the phase 2 work.
27. At this time no public consultation has been carried out but individual sites will become subject to consultation through the planning process should they be taken forward for development.

Implications

Financial and resources

28. The cost of the phase 2 feasibility work is funded from the approved site feasibility budget. £0.585m in additional funding is being sought as an adjustment to the approved capital programme for 2024/25 to carry out further work on sites detailed in the exempt appendix to this report.
29. To the extent that the work is feasibility, it cannot be capitalised. However, if during the process those became actual delivery plans, they could. Therefore, the request is for the funding and as to whether it is capital or revenue will be determined at a later date.

30. Depending on the disposals undertaken, capital receipts of £5.54m could be generated, if the disposal estimates were based on the lowest estimates. At current investment rates of 5%+, this could generate over £0.277m investment income over the course of a year although future returns are likely to reduce as interest rates and investment yields fall. It is worth noting that even if the cash was reinvested into investment property improvements, that impact is unlikely to be immediate and there would be a short boost to revenues.
31. Disposals would also have two other consequences: that of reducing capital liabilities and associated revenue costs and the revenue income streams attached to these council owned assets. However, those details will be considered in full as part of the proposed feasibility studies.

Legal

32. There are no legal implications arising from this work to date.
33. Following further detailed feasibility work, by virtue of section 123 of the Local Government Act 1972, the city council has the necessary statutory powers to dispose of its land. This section also states that on a disposal, the council are under a statutory obligation to obtain the best consideration that can reasonably be obtained for the land.
34. Best consideration will typically be achieved via a competitive marketing process. In cases where there is a proposed sale to a 'special purchaser' due to the ability to realise a marriage value, these will be subject to a red book valuation to ensure that there is an uplift above market value.
35. Achieving best consideration will also ensure that the council is not caught by the subsidy control regime.
36. If any part of the site consists of open space land, section 123(2A) of this Act states that the council must follow certain statutory requirements to advertise the disposal of the said areas of open space land.
37. Open space is defined in the Town and Country Planning Act 1990 as land laid out as a public garden, or used for the purposes of public recreation, or land which is a disused burial ground. If it's not held for such purposes, it can be disposed of without the need to advertise the sale. This will be considered ahead of any disposal of such land.
38. Section 122(1) of the Local Government Act 1972 states that local authorities have a general power of appropriation for land or property which is no longer needed for the purpose its held: '*a principal council may appropriate for any purpose for which the council are authorised by this or any other enactment to acquire land by agreement any land which belongs to the council and is no longer required for the purpose for which it is held immediately before the appropriation*' but subject to the rights of other persons in or over the land.
39. This general power is subject to the provisions of section 19(2) of the Housing Act 1985. This states that if property is being used for housing accommodation, the consent of the Secretary of State is required if the property is to be disposed of or otherwise taken out of the Housing Revenue Account. This section applies to properties used partly or wholly for housing, including yards,

gardens and outhouses, but garages are excluded from this.

Statutory considerations

Consideration	Details of any implications and proposed measures to address:
Equality and diversity	Sale of the assets will result in the transfer of the freehold interest, but this is not anticipated to have any material equality and diversity implications.
Health, social and economic impact	There are no direct consequences flowing from these proposals. Subject to full business case approval there would be potential economic growth from new development of light industrial or residential development.
Crime and disorder	There are no direct consequences flowing from these proposals. Albeit some of the properties in question are vacant and therefore can be targets for crime and disorder. The decision to dispose should assist in bringing the assets back into productive use.
Children and adults safeguarding	Not applicable
Environmental impact	Not Applicable

Risk management

Risk	Consequence	Controls required
Inability to dispose of the asset for the capital values identified.	Reduced capital receipts.	This will be monitored by the board and the action plan will be updated. A further asset review will be undertaken for assets which fail to sell on the open market.
Deterioration of market interest for development land	We are unable to generate interest for the land	This will be monitored by the asset & development commissioning board. There will need to be flexibility over the exact timing of disposals to guard against this and the board will also consider the best method of disposal to realise a sale and maximise a return.
Deterioration of market for proposed light industrial development.	We do not generate the anticipated revenue income.	This will be monitored by the asset & development commissioning board. Decision gateways will be implemented at each RIBA stage to monitor the market. If risk is realized post completion asset can be considered for disposal to recover the capital outlay.

Reasons for the decision/recommendation

40. The recommendations within this report are aimed at ensuring the continued proactive management of our land and property assets. This builds on the substantial achievements made over the past 2 years and as set out in this report. Setting out a clear policy for assets, understanding why we own them and how they contribute to corporate objectives, including the development of new homes and the creation of jobs will enable us to maximise the use of our assets. The capital receipts and generation of revenue streams will play a key role in helping to fund front line services and our proactive management of the portfolio will ensure that this is sustainable into the future.

Background papers: Bidwells Report (exempt)

Appendices:

Exempt Appendix

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