

Sustainable development panel

Date: Wednesday, 21 March 2018

Time: 09:30

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

Committee members:* For further information please contact:

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Agenda

		Page nos
1	Apologies	
	To receive apologies for absence	
2	Declarations of interest	
	(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)	
3	Minutes	3 - 6
	To approve the accuracy of the minutes of the meeting held on 21 February 2018	
4	Joint Core Strategy Annual Monitoring Report 2016-17	7 - 20
	Purpose - To present the 2016-17 Joint Core Strategy Annual Monitoring Report for Broadland, Norwich and South Norfolk.	
5	Publication of draft revisions to the National Planning Policy Framework Purpose - To alert members to the publication of the draft revisions to the National Planning Framework and associated documents and invite member comment on the suite of documents to inform the response of the city council to the consultation which will be submitted under delegated powers.	21 - 24
6	River Wensum Strategy	25 - 36
	Purpose - This report feeds back on the recent public and stakeholder consultation on the draft strategy, and sets out the revised strategy for endorsement by the council.	

Date of publication: Wednesday, 14 March 2018



MINUTES

Sustainable development panel

09:30 to 10:55 21 February 2018

Present: Councillors Thomas (Va) (vice chair) (in the chair), Davis, Grahame,

Jackson, Lubbock, Maguire and Malik

Apologies: Councillor Stonard (chair) (other council business)

1. Declarations of interest

There were no declarations of interest.

2. Minutes

RESOLVED to agree the accuracy of the minutes of the meeting held on 17 January 2017 subject to item 4, Norfolk Strategic Planning Framework, fifth paragraph, deleting "Greater Norwich Local Plan" and inserting "Norfolk" so that the sentence reads as follows:

"The head of planning service explained the process that each of the Norfolk authorities would undertake to sign off the framework over the next couple of months."

3. Norwich Economic Analysis and its implications for the Greater Norwich Local Plan

The head of planning services presented the report and the appended consultants' report which would form part of the evidence for the Greater Norwich Local Plan.

A member suggested that the concept of the Norwich Policy Area (NPA) being defined by housing growth to serve the economy of the area was now redundant and asked what its purpose was, if it was not to determine the location of housing growth. The head of planning services said that there had been a County Structure Plan in place prior to the Joint Core Strategy and that this had defined the NPA which had covered a wide range of policy matters not just related to housing. The partner authorities had not yet agreed what the definition of the Norwich Policy Area should be in relation to the GNLP. Government draft proposals to amend the National Planning Policy Framework (NPPF) indicated an approach to quantify housing need nationally across district authorities would mean that assessing the five year land supply across the NPA would be unfeasible. There was other work to manage housing within the policy district inside the area which included the strategic housing

market assessment. There was more demand for housing with affordable rents in the Norwich Area whilst the outlying rural areas had greater need for shared or intermediate tenure affordable housing. Growth in housing in the outlying areas would not provide affordable housing that served the needs of the city. There was strong policy evidence to retain the construct of a Norwich centred policy area.

Discussion ensued on the robustness of economic forecasting and the impact that the closure of a major employer could have to the city. The head of planning services referred to the forecasting model for the East of England and said that algorithms predicted economic trends based on local factual information and taking into account the continuance of historic trends. This was not the only source of evidence. No economic model could predict with certainty the impact of Brexit on the local economy. Norwich had a concentration of financial services in the city centre and at Broadland Business Park. The cluster of insurance services in Norwich was of national significance. Technological change would impact on jobs but it was really crucial to support and invest in new technology to capture the economic benefits. There needed to be sufficient concentration of financial services and knowledge intensive business services (KIBS) to ensure that businesses were sustainable in the city. A member referred to the closure of Unilever and said that priorities for future growth needed to take into account the constraints of the geographical location of the city. The head of planning services said that prioritisation of financial services; digital; creative industries and KIBS were not reliant on transport links and were key attributes of the city. The links between life sciences and agriculture was also distinctive to Norwich. Advanced manufacturing was not necessarily based in Norwich. The head of planning services said that he would check the food and drink criteria to see if it included the hospitality sector. There was a trend for people to eat out with more restaurants and cafes opening and therefore there was potential for this sector to grow.

A member asked about office space and commented that companies were relocating out of the city centre because of the lack of grade A office space. The head of planning services said that the stock of office accommodation in the city centre was generally of poor quality and unattractive to some businesses. The council had been unable to implement its policy to refurbish office accommodation as set out in the Local Plan 2014 because of the government's change to permitted development rights in relation to the conversion of offices to residential dwellings. The council applied for an Article 4 Directive to prevent this but like many other authorities was turned down. A member said that the function of a city was to bring businesses together. The head of planning services said that clusters of similar businesses created a vibrant core which attracted other similar businesses and other services, such as food and coffee shops, etc.

Discussion then ensued on how the Local Enterprise Partnership's economic vision was perceived across the region by other local authorities and members of the Greater Norwich Growth Board. It was acknowledged that at county level it was recognised that the Norwich area was a key driver of the local economy.

A member suggested that there should be greater targeting and monitoring of office space in the city to ensure that needs were met, through a supplementary planning document (SPD) which would operate in the same way as retail. He expressed concern that office space outside the city was reliant on individual car use rather than in the city centre with links to sustainable transport. The head of planning

services said that in order for an SPD, it would be necessary to establish the principle within areas of the city and this would be difficult in a shared document. Access to the city was one of the key challenges in attracting businesses into the city centre. A member said that she considered there should be more mixed development of sites, comprising office space and housing, as this contributed to employment opportunities in the city.

During discussion a member commented on the need to balance growth in areas of the city and the "domino effect" that this might have on other areas of the city and the impact of on the high street of national chains closing stores and restaurants. He said that he could foresee an increase in empty units. The head of planning services said that many people now considered retail as a leisure activity and ate out more. Many national stores were maintaining a high street presence despite a growth in internet sales. The development of Anglia Square would create a niche offer for leisure and shopping activities which would not compete with the retail sector in the city centre. A member pointed out that public transport needed to be improved as there was a lack of evening buses in some areas which made it difficult for people to attend gigs or visit restaurants after work.

In reply to a question the head of planning services said that "human health activities" encompassed social care where demand would increase in the next 40 years.

Discussion then ensued on the definition of Greater Norwich; how it was understood within the county and how it was identified. Members commented that the recent consultation on the City Vision 2040 showed that many residents were unaware of the district council boundaries within the urban area. Discussion then continued on the marketing of the city to particular industries and businesses. The head of planning services commented on the Financial Industry Group (FIG) presentation to the Greater Norwich Growth Board on 6 February 2018 which set out the vision for the Norwich Financial Cluster. Members considered the constraints of the city in terms of infrastructure and transport and its connections with the rest of East Anglia. Businesses situated in the Midlands had wider catchment areas than Norfolk which was on the coast and had poor quality transport links (road and rail) with the west and north of the country. Better connections with Cambridge and the Oxford corridor would also benefit the city's economic development. Members considered that Norwich could be the destination for technology and financial employment and that more students to its universities would remain here. There was a need to shift perceptions about Norwich.

A member commented that he would be interested in seeing the evidence on the economic analysis as part of the development of the Greater Local Plan and the council's submission. The head of planning services said that comments from the panel and cabinet members would inform the council's response.

RESOLVED to note the Norwich Economic Analysis produced by GVA Hatch for the council preparation of the Greater Norwich Local Plan and that it will form part of the formal submission as part of the evidence for the plan.

CHAIR

Page	6	of	36
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Report to Sustainable Development Panel

21 March 2018

Report of Director of regeneration and development

Subject Joint Core Strategy Annual Monitoring Report 2016-17

4

Item

Purpose

To present the 2016-17 Joint Core Strategy Annual Monitoring Report for Broadland, Norwich and South Norfolk.

Recommendation

To note the publication and content of the 2016-17 Joint Core Strategy Annual Monitoring Report.

Corporate and service priorities

The report helps to meet the corporate priority a prosperous and vibrant city, and a healthy city with good housing.

Financial implications

None directly.

Ward/s: All Wards

Cabinet member: Councillor Stonard - sustainable and inclusive growth

Contact officers

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Background documents

None

Report

Introduction

- The purpose of this report is to inform members of the publication of the Joint Core Strategy (JCS) for Broadland, Norwich and South Norfolk Annual Monitoring Report 2016-17 (the JCS AMR).
- In the interests of efficiency, the full JCS AMR, which is a large document, is available on the website http://www.greaternorwichgrowth.org.uk/planning/monitoring/ and is not appended to this report. Key summaries from the JCS AMR of direct relevance to Norwich are appended to this report (see below).
- 3. The JCS AMR records progress on the implementation of the JCS which provides the overall spatial planning strategy across the whole of the Greater Norwich area to 2026 and sets the context for the more detailed policies included in local plans for the individual districts. Progress is monitored since the base date of the JCS, which is 1 April 2008.
- 4. The Executive Summary of the full JCS AMR document summarises its key findings. It is attached as appendix 1 to this report.
- 5. Separate monitoring reports for the various district-wide local plans prepared by the constituent authorities are incorporated into the JCS AMR. The main conclusions from the appendix for Norwich are attached as appendix 2 of this report. These relate to the Norwich-specific policies in the Development Management Policies Local Plan (the DM policies plan) adopted in December 2014. A monitoring framework¹ forming part of the plan sets out a number of detailed indicators against which its 33 individual policies are being monitored and the success of those policies gauged. This report is only the second full year of monitoring of the DM policies plan.
- 6. This year a number of monitoring indicators for the JCS AMR have been reviewed and updated, both to simplify and streamline the process of monitoring the JCS in the light of reduced local authority resources and to remove any indicators that rely on data from third parties that is no longer collected or published.
- 7. Appendix A of the AMR provides information on the current housing land supply position in the Greater Norwich area, assessed against the Government's requirement for local planning authorities to maintain at least a five year supply of specific deliverable housing sites, as set out in the National Planning Policy Framework and supporting planning practice guidance². It includes tables showing housing completions in Norwich and its adjoining districts on a site by site basis in the last year and projections for future housebuilding on individual sites. The delivery estimates are informed by the

¹ See https://www.norwich.gov.uk/info/20221/development management polices plan Appendix 9.

² National Planning Policy Framework, Department for Communities and Local Government 2012: section 6 *Delivering a wide choice of high quality homes*. See http://planningguidance.communities.gov.uk/

- most recent evidence on delivery expectations provided by housebuilders and landowners during 2017.
- 8. The JCS AMR shows that housebuilding activity is increasing both in Norwich and in the Norwich Policy Area (NPA), which is the relevant area for calculating Norwich's housing land supply. Total housing delivery for the NPA in 2016-17 was 1,810, a significant increase from the 1,164 units delivered the previous year. This is the highest rate of delivery since the credit crunch of 2008 and the first time delivery in the NPA has approached the annual average required of 1,825 to deliver the JCS. In Norwich itself delivery increased from 365 units in 16/17 to 445 in 16/17.
- 9. In relation to the **five year land supply**, notwithstanding the very considerable increase in the rate of delivery, overall land supply remains similar to that reported last year. Based on the most recent available estimates, the land supply in the NPA as at April 2017 was **92.2%** of the required figure, or **4.61** years' worth of sites.
- 10. So long as a five year supply cannot be demonstrated in the NPA, Norwich City Council will need to take a view on how to address the requirements of the NPPF when considering planning applications.
- 11. However, for the first time the AMR also reports on housing land supply when measured against the more recently published figures in the Central Norfolk Strategic Housing Market Assessment (SHMA). Using this revised approach suggests that land supply is in a better position across the NPA, with a 6.82 year supply after allowance has been made for the City Deal.
- 12. Whilst this recent evidence around housing need is a material planning consideration that can be taken into account when determining planning applications it is considered, in the light of government advice, that the SHMA (which is largely untested) cannot be taken as the starting point in considering land supply at present. The weight attached to the new SHMA will increase as the GNLP is produced but for the time being all it may do is to potentially reduce the weight afforded to the shortfall in housing land supply when making planning decisions.
- 13. Appendix B of the full JCS AMR contains details of Community Infrastructure Levy (CIL) receipts across the three councils. CIL regulations require this report to include details of CIL receipts received over the monitoring period. Details of expenditure from the Greater Norwich Infrastructure Investment Fund are also recorded.
- 14. Appendix C of the full JCS AMR provides information in relation to the statutory Duty to Cooperate and how the Greater Norwich authorities are complying with the duty to plan collaboratively across boundaries. This includes discussion of progress on the Norfolk Strategic Framework which will set the general parameters to inform future local plans across Norfolk.
- 15. Appendix D of the full JCS AMR updates the sustainability appraisal baseline information covering the Greater Norwich area. This will inform the approach to the sustainability appraisal of the emerging Greater Norwich Local Plan (GNLP)

which will eventually replace the Joint Core Strategy, and of any other subsequent local plans which are dependent on the GNLP.

Joint Core Strategy for Broadland, Norwich and South Norfolk Annual Monitoring Report 2016-17

Executive Summary

- 1.1 This Annual Monitoring Report (AMR) assesses how the Greater Norwich area performed for 2016/17 against the objectives set out in the Joint Core Strategy.
- 1.2 There are many indicators that are currently being met or where clear improvements have been made:
 - The number of new employee jobs have increased this year;
 - The number of Lower Super Output areas among the most deprived 20% nationally has shown a relative reduction since 2009/10;
 - Net housing completions have increased from last year and are at the highest level since 2009/10;
 - The number of affordable housing completions has more than doubled from the previous year;
 - The proportion of workers employed in higher occupations have increased:
 - The level of 16-18 year olds who are not in education, employment or training has reduced from last monitoring year;
 - The proportion of population aged 16-64 qualified to NVQ level 4 has increased year on year;
 - The rate of active new businesses has increased;
 - Norwich has maintained its13th position in the national retail ranking;
 - No listed buildings have been lost or demolished;
 - CO₂ emissions per capita have decreased; and
 - The proportion of household waste that is recycled and composted has remained stable from last monitoring year.
- 1.3 There are several indicators where targets are not currently being met, some of which have been adversely affected by the global economic downturn. There are however some indicators which are perhaps less influenced by external factors and these are the areas where the overall focus of action should be placed:
 - Although housing delivery has improved in recent years, the number of completions remain below target;
 - Affordable housing completions are below target in both percentage and absolute terms;

- Some of the economic indicators are not on target particularly the office floorspace, and city centre retail floorspace are not growing as envisaged;
- The continued loss of office space in Norwich City, and the growth of office space in Broadland and South Norfolk is noteworthy, continuing previous years' trends;
- The total crime level has increased this year;
- The number of people who were killed or seriously injured on roads has increased in the Greater Norwich Area;
- 1.4 Even though a five-year housing land supply cannot be demonstrated, throughout the monitoring period there is a significant stock of unimplemented planning permissions for housing. The consistent under delivery of dwellings across the period reflects tough market conditions and housing industry business models that seek to maintain margins rather than necessarily increase supply. The low levels of affordable housing delivery are partly due to developers being able to demonstrate that planning obligation requirements challenge viability.
- 1.5 Similarly, the underperforming economic indicators reflect wider economic conditions. However, there is a strong argument that the ambitious JCS targets for office and retail development reflect older business models and less efficient use of space.
- 1.6 Crime rates and road accidents are among several "contextual" indicators in the AMR. The JCS has, a limited impact on these indicators.

Conclusion and next steps

- 1.7 A range of activities are underway that will have a positive impact on stimulating growth and help deliver against targets over the coming years.
- 1.8 A number of local plan site allocation documents were progressed during the monitoring year in Broadland and South Norfolk and these have since been adopted. These will provide more certainty to developers and investors.
- 1.9 The local planning authorities, working with the County Council and the LEP through the Greater Norwich Growth Board, progressed implementation of the Greater Norwich City Deal agreed with Government in 2013. Working together, the partners support the private sector to deliver in numerous ways, including:
 - making a Local Infrastructure Fund available to developers to unlock site constraints;
 - direct investment in infrastructure such as the NDR and other transport measures; and
 - engagement in skills initiatives to improve the match between labour supply and demand.

1.10 The authorities are working with colleagues across Norfolk and Suffolk to negotiate a devolution deal with Government that includes options to stimulate growth, covering areas including housebuilding, economic growth, infrastructure and skills. The LPAs have recently begun to review and roll forward the JCS to produce the Greater Norwich Local Plan (GNLP), scheduled to be adopted in 2020. The AMR will inform and be informed by this process.

Appendix 2 Norwich City Council Report against policies in the adopted Norwich development management policies local plan

Summary of Main Findings

The AMR's main findings in relation to the monitoring of its own district wide policies are set out in the following table:

Issue	Findings
Housing	 Taking account of dwellings lost through demolition and conversion, 445 new dwellings were built including completion of development at Brazen Gate/Southwell Road, the completion of a substantial part of the former Lakenham Sports Club, Carshalton Road, two adjoining sites contributing to the regeneration of King Street and a new 66 dwelling apartment development at Wherry Road, alongside a significant number of dwellings provided through conversion of former office premises under permitted development (PD) rights. 4219 homes had planning permission in Norwich as at April 2017 (a small increase over the figure a year previously (4181); Of these 985 dwellings were granted planning permission in 2016/17 although a significant proportion of these were approval of details, resubmitted or amended schemes on sites where the principle of development has already been agreed. Of these, 406 homes were office conversions granted prior approval as PD which do not have to provide affordable housing and are not subject to the policies of the plan which would otherwise apply, including those in relation to space standards, amenity and outlook, parking and servicing. 335 of these were accounted for by three large schemes at Elliott House Ber Street, Sentinel House Surrey Street and Paston House Princes Street: the first two of these are already underway; Work continued on the St Anne's Quarter development at King Street, which will provide a total of 437 homes on a key regeneration site, initial release of the first phase of homes expected at the end of 2017. The 105 dwelling regeneration scheme at Goldsmith Street also made substantial progress. New student accommodation was approved at 30 All Saints Green providing total of 244 student bedrooms, to be known as "The Quad". Construction of this city centre scheme is already well advanced and is scheduled for completion in September 2018. There has been a very significant rise in the number of proposals for student accommoda

Issue	Findings
	is estimated that there are now over 2000 student bedrooms in the potential development pipeline taking account of proposals at pre-application stage; • 90.2% of completed dwellings achieved a residential density at or above the minimum of 40 dwellings per hectare set by local plan policy. This is an increase over the comparable figure in 2015-16.
Heritage	 No listed buildings were lost during the 2016-17 reporting period; The number of buildings on the Heritage at risk register (27 Listed Buildings and one Scheduled Ancient Monument) has reduced from the situation last year when there were 28 listed buildings.
Environment	 A range of green design and wildlife friendly features were negotiated in schemes across the city, including green roofs and bat and bird boxes in smaller schemes and wider green infrastructure initiatives in larger developments. A standard planning condition is now attached to planning permissions to ensure access routes for small mammals are available (via gaps in fences, etc.). One application raised Environment Agency concerns in relation to flood risk (a temporary warehouse at Havers Road): this was approved following the receipt of supplementary information in a revised flood risk assessment. No applications raised water quality concerns or were refused on those these grounds; 90% of Norwich's County Wildlife Sites are in positive conservation management (27 of 30 sites) and there were no losses of nature conservation sites to development; CIL funding has been used or earmarked for further natural environmental improvements and access improvement works at Earlham Millennium Green and Bowthorpe in the Yare valley, east of Carrow Bridge in the city centre and along Marriotts Way. Based on latest published figures (2015), air quality monitoring shows that levels of nitrogen dioxide and airborne particulates are reduced from previously reported levels, with NO₂ levels having shown a marked reduction in Castle Meadow. Average levels across the city centre Air Quality Management Area remain well below the recommended maximum of 40 µg/m³.
Trees and Landscape	No land in the Yare Valley Character Area (YVCA) was lost to development in the reporting period, although there has been a small loss since as a result of
	 development at Sandy Lane. 403 applications for works to trees (were submitted in the reporting period (280 in conservation areas); 354 of these were approved. 17 applications resulted in the serving of

Issue	Findings
	 new Tree Preservation Orders. There was however no net loss of trees or hedgerows as a result of development. No new street trees on the frontage to development sites were funded through planning obligations (the city council is now moving away from this funding mechanism) although a significant number of trees and landscaping enhancements were delivered in new development schemes.
Open Space	 Just under a hectare of designated open space was lost to approved development, the majority being poor quality open space at the Swanton Road travellers site extension; New areas of public open space secured by s106 agreement were transferred to city council control at Fifers Lane and The Loke, Dereham Road. 5.2 hectares of new recreational open space for public use has been secured by legal agreement at the former Bartram Mowers site on Bluebell Road, whilst 1.17 hectares of formal and informal open space and allotments will shortly be brought into use at the former Lakenham Sports and Social Club site.
Employment	 For the first time since the local plan was adopted there was a recorded net gain in approved employment floorspace on designated employment land as a result of new development coming forward on land north of Hellesdon Hall Road, Sweet Briar Road, Europa Way and elsewhere Further significant losses of office space were recorded in the city centre (amounting to 24,449 sq.m) sanctioned under the prior approval process involving conversion for housing and educational use – the Charles Darwin Primary Academy set up in former office premises in Rose Lane was brought into use in 2016. Contrary to expectations, the number of office to residential schemes coming forward increased sharply in comparison with 2015-16, with three major city centre schemes approved providing 335 apartments and a further three previously approved schemes underway. In contrast to previous years these schemes have started to affect more modern higher specification offices of the kind the local plan had sought to protect (in particular the 1980s Sentinel House, Surrey Street) as well as lower quality 1960s and 70s buildings, which have also been subject to numerous conversion proposals for student accommodation development.
Retailing	The postponement of the city council's annual shopping survey to 2018 means that we are unable to report in detail on retail floorspace change in the city centre and district and local shopping centres for this year's AMR.

Issue	Findings
	 On the basis of permissions granted there would appear to be a continuing, albeit gradual, loss of city centre shops to other uses, most notably restaurants and cafes although there were some examples of other uses being approved in former shops such as the creative arts and community hub at Swan Lane (within the Lanes area). The single largest retail development scheme was the major extension to Primark's store in the Haymarket, totalling 7735 sq.m (net gain of 1805 sq.m allowing for the demolition of the existing shops on the site). Elsewhere, work continued to extend the Timberhill level of Castle Mall to provide a new dining terrace, whilst discussions are continuing on the major housing led development scheme for Anglia Square, an application for which is expected soon. The most significant developments out of centre were a new foodstores for Lidl on a site immediately adjoining the Aylsham Road district centre: construction has commenced. Other notable retail developments included new stores for Aldi at Drayton Road and Hall Road and the new larger Wickes DIY store at Hellesdon Hall Road. In contrast to last year the majority of new floorspace for main town centre uses was outside of defined centres. This was largely due to three separate permissions for leisure uses (two gyms and a dance school) approved within former industrial buildings on employment areas, justification for which was provided by the applicant in each case on the basis that no suitable premises were available within the city centre or district centres.
Community Facilities	 13 new permissions for community facilities were granted in the 2016-17 reporting period. These covered a wide variety of uses from surgeries, medical centres and other healthcare facilities to church halls and arts and cultural events space. Three new leisure facilities requiring wide span buildings were approved on out of centre sites as noted above, whilst the new Tuckswood Community Centre approved in association with the recently opened ASDA store at Hall Road was brought into use recently. Six proposals involving new education and training facilities were approved, including two completely new schools (Wherry Special School, Hall Road and the Charles Darwin Primary Academy at Rose Lane); additional teaching space for two existing schools, a city centre financial services training centre and minor development at Duke Street for the NUA. Community facilities proposed to be lost as a result of new permissions granted in 2016-17 included a dental surgery, two places of worship and clinical facilities at the

Issue	Findings
	Julian Hospital and on various sites in the city centre. An application for the residential conversion St Peters Methodist Church, Park Lane was refused just after the end of the reporting period in July 2017 after a lengthy period of negotiation failed to produce an acceptable scheme; • Six community pubs identified for protection under local plan policy – two in the city centre and four in the outer area - closed this year, although none have yet been lost permanently to other uses; • Between April 2015 and May 2017 national planning regulations were in operation that withdrew PD rights for the change of use of pubs that were registered as Assets of Community Value. 22 Norwich pubs have been registered with ACV status since 2015, with seven newly added to the register in 2016-17. A further rule change in in May 2017 means that planning permission is now required to demolish or change the use of any pub, irrespective of its location. Consequently it can be expected that ACV registration will no longer be used as a primary means of protecting local pubs, although it may still be used to help protect other community facilities.
Leisure, catering, Evening and Late Night Economy	 As noted above there was some further growth in catering and hospitality uses in the city centre with restaurants, bars and cafes having been approved at the expense of shops in various parts of the centre including Swan Lane, St Benedict's, Rose Lane and Chapelfield. Investment in pubs and bars was notable with a major refurbishment of the Bell Hotel approved and ongoing during the year. Four new hot food takeaways were approved in former shops: two in district and local centres, one in the city centre and one elsewhere; one was refused. No new leisure uses were approved in the city centre, although leisure facilities form an important component of the emerging Anglia Square proposals. Just two new late night uses were approved, both within the Late Night Activity Zone (LNAZ) centred on Prince of Wales Road. The city council's Special Cumulative Impact Policy (CIP) for licensing applies within a more extensive area in the south east of the centre which includes the LNAZ. It seeks to restrict the proliferation of such uses where they are likely to contribute to increased crime and disorder.
University of East Anglia (UEA)	 The first phase of a 915-bed student accommodation development at the former Blackdale School site was completed in September 2016 Discussions are continuing in relation to options for development of further academic and science buildings on campus and extension to the Law School, with

Issue	Findings
	planning applications submitted for both.
Transport	 Significant investment in sustainable transport schemes progressed during the reporting period, including the completion of streetscape enhancement works in the city centre at All Saints Street, All Saints Green and Westlegate, further work on the Pink Pedalway (new cycle path and link at Heathgate), work to improve cycle and pedestrian accessibility along the Yare and Wensum and key access improvement projects associated with strategic transport links and Bus Rapid Transit (BRT) along the A1074 Dereham Road and A11 Newmarket Road corridors. Construction of the Norwich Northern Distributor Road (NDR) to relieve pressure on the highway network in the north and east of the city made rapid progress, with some sections set to open in late 2017 ahead of schedule; A significant number of low car dependent schemes in various parts of the city were negotiated and approved, with car free developments approved for the new student accommodation development at All Saints Green and on smaller sites elsewhere in the city centre. A draft masterplan for the Airport setting out its proposed development strategy to 2045 was in preparation during the reporting period and was published for consultation in June 2017. The city council's cabinet resolved to endorse the masterplan subject to a number of changes particularly in relation to climate change impacts.

Report to Sustainable Development Panel

21 March 2018

Report of Director of regeneration and development

Publication of draft revisions to the National Planning

Subject Policy Framework

5

Item

Purpose

To alert members to the publication of the draft revisions to the National Planning Framework and associated documents and invite member comment on the suite of documents to inform the response of the city council to the consultation which will be submitted under delegated powers.

Recommendation

That the panel comments on the draft document to inform a possible response to the consultation.

Corporate and service priorities

The report helps to meet the corporate priority a prosperous and vibrant city, and a healthy city with good housing.

Financial implications

None direct.

Ward/s: All Wards

Cabinet member: Councillor Stonard - sustainable and inclusive growth

Contact officers

Graham Nelson, head of planning services 01603 212530

Background documents

None

Report

Introduction

- 1. Draft revisions to the National Planning Policy Framework (NPPF) we published on 5 March for consultation until 10 May.
- Owing to the timing of release of the consultation material and the timing of Panel meetings it is not possible to prepare a draft response to the consultation for members to comment on. It is still intended that the city council respond to the consultation and this response will be issued by officers under delegated powers.
- 3. A presentation will be given to the panel about the significant aspects of the consultation and its potential implications for Norwich to inform debate.

Material published in support of the consultation

4. To date six documents have been published to inform the consultation. These are as follows:

Consultations

NPPF consultation proposals – This document summarises the main changes proposed in the revised NPPF and asks a series of questions related to its content:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/685288/NPPF Consultation.pdf

NPPF draft text for consultation – this is the revised NPPF as proposed: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf

Developer contributions – this is a consultation seeking views on reforming the process for developers contributing to affordable housing and infrastructure. It covers the following areas: Community Infrastructure Levy; Sec 106 Planning Obligations; Strategic Infrastructure Tariff; and Technical Clarifications to Regulations, and seeks to implement measures outlined as part of Autumn Budget 2017

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/685428/Developer Contributions Consultation.pdf

Draft documents

Viability – this document sets our draft planning policy guidance for assessing viability in the planning process:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/685291/Draft_viability_guidance.pdf

Housing Delivery Test – this ia a draft document setting out a proposed methodology for calculating the Housing Delivery Test proposed in the revised NPPF:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/685292/Housing_Delivery_Test_Measurement_Rule_Book.pdf

It is expected that further draft documents will be published during the consultation period. For instance para 61 of the proposed NPPF refers to housing numbers in local plans being based upon a local housing need assessment, conducted using the standard method in national planning guidance. This draft methodology was the subject to consultation last autumn the outcome of which is still not known.

Evidence

Planning obligations and CIL 2016 to 17. This is academic research examining the use of developer contributions in England during the financial year 2016/17, presenting an account of the value, incidence and delivery of both S106 planning obligations and CIL.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/685301/Section 106 and CIL research report.pdf

The current NPPF dates from March 2012. If members are interested in checking how it compares to the proposed revisions it is still available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

Report to Sustainable development panel

Item

21 March 2018

Report of Director of regeneration and development

Subject River Wensum Strategy

6

Purpose

This report feeds back on the recent public and stakeholder consultation on the draft strategy, and sets out the revised strategy for endorsement by the council.

Recommendation

To endorse the revised River Wensum Strategy, and to recommend to cabinet that it adopts the strategy.

Corporate and service priorities

The report helps to meet the corporate priorities: a safe, clean and low carbon city, a healthy city, a fair city, and value for money services.

Financial implications

None arising from this report.

Ward/s: Multiple Wards, including Wensum, Mile Cross, Mancroft and Thorpe

Hamlet

Cabinet member: Councillor Stonard - Sustainable and inclusive growth

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Background documents

None

Report

Background

- The River Wensum is a valuable asset to the city, with a rich heritage, and has great potential to drive wider economic, social and environmental improvements.
- 2. The River Wensum Strategy Partnership (RWSP) was created in December 2014 to develop a strategy for the River Wensum in Norwich in order to maximise its potential for regeneration, in particular by encouraging greater access to the river corridor, enhancing its natural and built environment and biodiversity value, and by stimulating business and economic activity. The RWSP is led and project managed by the city council. Councillor Stonard is the member lead and chairs the RWSP Project Board. Partners comprise the Broads Authority, Norfolk County Council, Environment Agency, and the Wensum River Parkway Partnership.
- 3. Over the past couple of years the RWSP has consulted the public and stakeholders on issues and opportunities for the river corridor (in 2015) and on a draft strategy document (in 2017).
- 4. The draft strategy has now been revised following the most recent consultation. Please note that a consultation response was made by this Panel at the meeting on 13 September 2017 see paragraph 11 below.
- 5. The resulting River Wensum Strategy is a long term strategy to facilitate positive change in the river corridor, by helping to change perceptions of the city as a visitor destination, improving the quality of life, and acting as an economic driver to attract external investment and contribute to the city's regeneration.
- 6. The purpose of this report is to provide feedback on the recent consultation, and to present the proposed final version of the strategy for endorsement by sustainable development panel, and subsequently for adoption by cabinet.

Consultation

- 7. A public and stakeholder consultation was held between July and September 2017, and involved a public exhibition on 26 July which was attended by over 70 individuals and organisations.
- 8. The consultation attracted a high volume of comments from a range of consultees. There were over 240 online responses to the consultation plus approximately 20 written responses. In addition a good range of organisations responded to the consultation, including RWSP partners, Historic England, Norwich City Council Green Group, Norwich BID, VisitNorwich, Norwich Playhouse, developers, Friends groups (including Train Wood, Marlpit), stakeholder and user groups (angling, canoeing) environmental groups (RSPB, Norwich Fringe, CPRE) and residents groups (St Edmund's Wharf, Old Millers Wharf, Quayside).

- 9. This is a very positive level of response for a public consultation and demonstrates a strong public interest in the strategy from local residents, key public bodies, the business community and stakeholder groups.
- 10. Analysis of online comments overall is very supportive of the draft strategy see the table below. Most online respondents commented on a range of issues. Consultees were able to provide additional comments to their online response, which many did resulting in about 550 such responses. Some of these comments are critical but these tend to be from a small number of consultees.

	Strongly agree / agree (%)	Neutral (%)	Disagree / Strongly disagree (%)	No. of online responses (240 total)	No. of additional responses
Vision/objectives	79	8	13	223	82
Management	75	11	14	204	51
Walking cycling access	80	5	15	195	81
Waterways access	80	6	14	188	78
Environment	87	5	8	187	62
L-T opportunities	74	19	7	184	52
Implementation	72	14	14	182	51
Other comments	n/a	n/a	n/a	n/a	87

11. The main issues raised by consultees include:

- (a) Need for greater emphasis on projects upstream of New Mills, particularly to address social inequalities. This was raised by several respondents including Friends of Train Wood and Marriott's Way, Friends of Marlpit Paddocks, and Norwich Green Party.
- (b) Need for greater emphasis on environmental issues and objectives, particularly biodiversity. Respondents included Sustainable Development Panel which proposed an amendment to the objective related to the natural environment to include biodiversity, Norwich Green Party, and several individuals.
- (c) Need for greater reference to heritage issues (raised by Historic England, and Norfolk County Council Community and Environmental Services) to acknowledge the importance of the historic environment in the river corridor.
- (d) Support for partnership working on delivery from many respondents including Norwich BID, and stakeholder and community groups.
- (e) A number of respondents, both individuals and stakeholder groups, highlighted the potential opportunities for community input including development of a volunteer workforce.
- (f) Several respondents wanted to see structured evaluation /prioritisation of projects on an agreed set of criteria (Norwich Green Party, Friends of Marlpit Paddocks, Friends of Train Wood).
- (g) A number of projects were proposed, many upstream of New Mills including improved canoe access and walking access (individuals and stakeholder groups).

(h) The strategy proposal to complete the 'missing link' of riverside walk between Fye Bridge and Whitefriars raised a number of objections from local residents (St Edmund's Wharf, Old Millers Wharf), chiefly on grounds of amenity and safety.

Revised strategy

- 12. The strategy, as proposed to be revised, has taken on board many of the consultation responses. An analysis of the consultation responses is set out in the table (see link to website below) and a list of all proposed changes is set out at appendix 1 to this report. Comments have been summarised and amalgamated where possible into groups of issues to assist with clarity. Individual respondents are not named however the names of organisations and stakeholder / community groups are included. (Link to table of consultation responses:
 - https://www.norwich.gov.uk/downloads/file/4420/river wensum strategy table of responses)
- 13. Overall, the strategy is not proposed to be fundamentally changed from the draft version published in 2017. The revised strategy still has the same key themes as the draft strategy: management and partnership working, access for walking and cycling, waterways access, and environment, with the overall aim of regenerating the river corridor. In terms of delivery, the revised strategy continues to stress the importance of working in partnership with key stakeholders to implement policies and proposals, and the importance of seeking external project funding.
- 14. However there are several changes of emphasis in the revised document. In particular, the strategy is proposed to be revised to clarify that its focus is not just on the city centre to east Norwich area but that it includes a number of potential projects in the area upstream of New Mills. It is acknowledged that this was not made sufficiently clear in the draft strategy. Accordingly the revised strategy includes:
 - (a) An update to Appendix 3 of the strategy(Potential strategy projects) by adding several new projects identified during the consultation. It should be noted that many of the projects suggested by respondents were already listed in this appendix. The majority of the projects in Appendix 3 are located upstream of New Mills, within Wensum and Mile Cross wards and, if implemented, should help address social inequalities in this area.
 - (b) An updated Action Plan to include a new action to assess all the projects in Appendix 3 in Year One of project delivery (2018/19). These will be added into an updated Action Plan subject to their performance in the assessment.
 - (c) Inclusion of assessment criteria for potential projects, based on the extent to which they meet strategy objectives and provide value for money, and their deliverability. This also specifies that a basic prerequisite for additional projects will be to demonstrate that they can attract external funding, and that they fully address maintenance costs so as not to add to existing council maintenance burdens.
 - (d) A new summary map to illustrate both action plan projects and potential future projects (see appendix 2 to this report).

- 15. Other proposed changes highlight the importance of the natural and built environment, for example:
 - (a) Several changes to make greater reference to environmental issues in the Vision and Objectives and in the Environment section, including reference to biodiversity in the objective relating to the environment.
 - (b) New text and a plan in the Environment section to provide context on the historic environment in the river corridor.
- 16. Greater reference is also added in the revised strategy to encouraging active participation of local communities and stakeholders in project delivery where appropriate.
- 17. A significant change is proposed to one of the action plan projects seeking to complete the missing link of Riverside Walk between Fye Bridge and Whitefriars Bridge. As stated above there was much local opposition to this proposal on grounds of amenity impact and safety. It should be noted that the city council has a long-standing ambition to complete the riverside walk on both banks of the river and has succeeded in delivering over 11km of walkway in the city to date. This particular stretch has some sections of riverside walk in place already, including in front of St Edmund's Wharf and Old Miller's Wharf. The principle of completing this link will remain a proposal in the local plan and an aspiration in the River Wensum Strategy, and is supported in principle by the Greater Norwich Growth Board. However, given the concerns raised through the consultation it is proposed to remove this project from the action plan to allow for detailed investigation of feasibility and deliverability, to inform options for completion of this missing link. There is already a riverside walk in place on the opposite bank of the river, at Quayside, and the strategy makes clear that the priority is the completion of the missing link in the vicinity of the Playhouse, where there is currently no access on either bank.
- 18. A number of more minor changes are also proposed, including clarifications, minor edits, consequential changes, and updates. The table of minor changes is available on the council's website for information. (Link to minor changes: https://www.norwich.gov.uk/downloads/file/4422/river_wensum_strategy_table_of_minor_changes)
- 19. The revised strategy document and annex are attached at these links:

Revised strategy:

https://www.norwich.gov.uk/downloads/file/4418/revised_river_wensum_strateg_v_large_file_12_mb

Annex:

https://www.norwich.gov.uk/downloads/file/4419/revised river wensum strateg y annex

Conclusions and next steps

- 20. This is an opportunity for sustainable development panel to comment on the revised River Wensum Strategy. The revised strategy provides a clear vision and set of objectives for the area, and proposes a set of policies and projects that will help to bring about sustainable regeneration of the river corridor for the benefit of the city council, its partners, residents, businesses and visitors to the city. It will help to:
 - (a) Attract external investment: the strategy will act as a basis for funding bids; its emphasis on working closely with key partners and stakeholders is likely to improve access to funding opportunities.
 - (b) Support growth: Delivery of enhanced green infrastructure along the river corridor will support the major housing and employment growth planned for the city centre and east Norwich.
 - (c) Support the local economy: a more accessible river corridor with a high quality public realm will help boost the local economy, both by providing a backdrop more attractive to the relocation and creation of business in the creative sector and also by attracting tourists and visitors with benefits to Norwich's shopping, heritage and visitor attractions.
 - (d) Reduce inequalities: the strategy has potential health and recreational benefits for existing communities adjacent to the river, some of which suffer from high levels of deprivation and health inequalities.
 - (e) Address management and maintenance of the river corridor: The strategy will not add to the council's management and maintenance liabilities. Through more streamlined management of the river corridor, issues such as illegal mooring should be resolved more quickly and help reduce related costs. There is also potential for involving volunteers and local communities in delivery, which has the potential for reducing management and maintenance costs.
 - (f) Generate income: The strategy has potential to assist with income generation for the city council, for example by creating the conditions to increase activity in the river corridor and support the use of council owned river infrastructure, such as some of its pontoons, thus leading to increased revenue.
- 21. It is therefore recommended that sustainable development panel endorses the revised strategy and recommends to cabinet that it adopts the strategy at its next meeting in June. The strategy will also be reported to the committees of the partner bodies in June and July, for adoption.

Appendix 1: Table of proposed changes to River Wensum Strategy

Proposed change reference	Document reference	Proposed change
PC1	Para 2.3 & Executive summary	Amend the vision at paragraph 2.3 (and in the Executive Summary) to read "The strategy aims to breathe new life into the river corridor by enhancing it for the benefit of all and increasing access to, and greater use of, this important asset. An enhanced river corridor, with its unique natural and historic environment, will once again play an important role in the growth and vitality of the city, strengthening the visitor economy, and helping to give the city a competitive advantage in attracting inward investment."
PC2	Environment	Add new paragraph 6.45 to read: "The River Wensum strategy area does not exist in isolation, and developments outside its boundary may have implications and opportunities for the regeneration of the river corridor, such as the proposed Western Link from the Northern Distributor Road to the A47. If this major development goes ahead it is important that any potential environmental impacts arising from it on the Wensum downstream are fully addressed and mitigated."
PC3	New para 6.3	Add new paragraph 6.3 in the Environment chapter: 'The easterly, low-lying and coastal nature of the Broads landscape makes it particularly vulnerable to the predicted impacts of climate change and sea level rise, including coastal and river flooding. The length of river covered by this strategy includes both tidal and fluvial influenced sections, as New Mills pumping station is considered the tidal limit. The strategy should underpin climate change adaptation to ensure that flood, environmental and economic resilience is improved as a result of actions taken. The flood risk planning responsibilities of the Environment Agency consider the risks posed by climate change. More information on climate change in this area can be found through the Broads Climate Partnership at http://www.broads-authority.gov.uk/looking-after/climate-change.'
PC4	Paras 6.36- 6.38	Insert new section on the Historic Environment at paragraphs 6.36 - 6.38 in the Environment section.
PC5	Executive Summary	Add the words "and historic" into first sentence of Section on Environment in the Executive Summary to read: "The strategy aims to improve the natural and historic environment" Add additional bullet under Environment heading on p.6 to read: "Conserve and where possible enhance the historic environment and individual designated and non-designated heritage assets along the riverbank to

Proposed change reference	Document reference	Proposed change	
		ensure the historic riverside environment."	
PC6	Para 3.14	Add new second sentence into paragraph 3.14: "Opportunities will be taken where appropriate to encourage the active participation of these groups in the enhancement and management of the river corridor."	
PC7	Para 4.1	Amend second sentence of paragraph 4.1: "The strategy presents an opportunity to improve the infrastructure for walking and cycling within the Wensum River corridor for all users,"	
PC8	Para 2.4 & ES	Amend the third objective in paragraph 2.4 (and in Executive Summary) to read "Enhancing the natural environment, biodiversity and green infrastructure".	
PC9	Para 2.4 & ES	Amend fifth objective in paragraph 2.4 (and in Executive Summary) to read "Enhancing the historic environment, ensuring its long term conservation where practicable, and making the most of the unique and significant heritage assets within the river corridor".	
PC10	Para 3.13	Amend para 3.13 by adding the following: "Historic England and potentially the Heritage Lottery Fund in relation to projects that have an historic environment element;"	
PC11	Para 3.13	Amend the section on Partnership working by adding a new final sentence to paragraph 3.13: "Local community groups and stakeholder groups can also play an important role in the design and delivery of projects and in some cases it may be appropriate for projects to be community led, dependant on the nature of specific projects."	
PC12	Action plan table, para 8.3-8.5, and para 1.10	Amend action plan to require an audit of all potential projects identified through the consultation, to be undertaken in the short term (within 1 year), and add new text at paragraph 8.3-8.5 setting out the proposed assessment criteria. Amend Executive Summary to reflect this, adding a new second sentence under Action Plan and Funding to read: "The action plan also includes an assessment of potential project suggestions in order to identify additional projects for future delivery. It is a living document and will be updated as required.". Also amend para 1.10 by adding a new second sentence "The focus of current action plan projects is mainly within the city centre as this is where current opportunities and potential funding have been identified, however there are other projects that could be developed for the area upstream of New Mills, some of which have been identified through the consultation process." and a new penultimate sentence: "Potential future projects will assessed and, subject to how they perform against the assessment criteria, may be included in a future version of the	

Proposed change reference	Document reference	Proposed change
		Action Plan." .
PC13	Appendix 2	Amend reference to Norwich City Council planning policy DM28 in Appendix 2 to refer to the policy more fully, by adding: "Development proposals with a frontage to the river Wensum which includes the route of the Riverside Walk will be required to make provision for the relevant section of the walk as part of the overall design of the development. Where development adjoins a navigable section of river opportunities should be taken to provide residential and/or commercial moorings, to facilitate access by water where appropriate and reasonably practicable to achieve."
PC14	Para 4.6 and 4.10, map 4	Remove map 4 as this is no longer an action plan project. Revise paragraph 4.6 by replacing the third sentence with: "The completion of missing stretches of Riverside Walk from New Mills to Trowse Swing Bridge is therefore a key objective of the strategy reflected in policy 2, and with the priority being completion of the 'missing link' in the vicinity of the Playhouse which is considered to be deliverable within the strategy period. Completion of the Fye Bridge to Whitefriars Bridge missing link is highlighted as a longer term aspiration. The missing section of Riverside Walk upstream of New Mills". Include new text in paragraph 4.10 following the first sentence, and amend part of third sentence, to read: "This link is considered to be capable of implementation in the longer term dependent on detailed investigation of feasibility and deliverability. Once delivered this project would unlock the remaining section between"
PC15	Para 4.16 & Appendix 3	Include new final sentence of paragraph 4.16: "This project is included in the list of possible future action plan projects in Appendix 3." Add new bullet point in Appendix 3 under Walking and Cycling Access: "Creation of a new section of riverside Walk between Sweet Briar Road and the public open space adjacent to The Gatehouse Public House on Hellesdon Road, to provide access to the river."
PC16	Map 10	Amend map 10 to show correct location of upstream canoe portage point.
PC17	Para 5.14	Amend paragraph 5.14 is changed to read " enhancing provision upstream of New Mills, including at Wensum Park, Andersons Meadow and near Hellesdon Mill." Add new potential future action plan projects to Appendix 3 under 'Waterways Management, access and leisure': 'Provision of canoe access close to Marlpit Paddocks'.
PC18	App.3	Add new potential future action plan projects to Appendix 3 under 'Waterways Management, access and leisure': 'Provision of canoe access at Wensum Park and Anderson's Meadow'.

Proposed change reference	Document reference	Proposed change
PC19	App.3	Add new potential future action plan projects to Appendix 3 under 'Waterways Management, access and leisure': 'Investigate proposal to reintroduce a small, pedestrian ferry across the Wensum at the site of Pull's Ferry.'
PC20	Para 5.36	Amend paragraph 5.36, first sentence to read: 'Although Norwich has a thriving tourist industry and is a popular short stay destination, there is great potential to maximise the tourism and leisure opportunities offered by the River Wensum.'
PC21	Para 6.12	Amend final sentence of paragraph 6.12 to say:" The project will be delivered by the Environment Agency, anticipated in 2018/19." Amend action plan accordingly.
PC22	Paras 6.18 – 6.19	Insert section in to document at end of paragraph 6.19: "These projects will be assessed against a set of criteria for inclusion in the action plan (see paragraphs 8.3-8.5). The action plan is intended to be a living document to be updated over time with input from relevant stakeholders. " Amend final sentence of paragraph 6.18 to read: "It is anticipated that the Biodiversity Enhancement and Non-Native Species Management Plan will be developed in partnership with appropriate organisations and conservation bodies."
PC23	Action plan	Amend action plan in section 8 (Implementation) by bringing forward the timescale for project E2 from 2020/21 to 2018/19, and change lead to EA/NWT.
PC24	Paras 6.14 & 6.35	Amend paragraph 6.14 by adding a sentence to the end: "The river runs adjacent to several designated sites of importance for biodiversity and nature conservation including Marlpit, Hellesdon Meadows and Train Wood County Wildlife Sites, and Andersons Meadow Local Nature Reserve." Amend paragraph 6.35 first sentence to read: "The river also possess several areas that afford quiet and more naturalised spaces, such as along the Marriott's Way approaching Hellesdon Mill, including the Marlpit Paddocks, Anderson's Meadow, Train Wood and around the Cow Tower."
PC25	Para 6.39	Amend fifth sentence of paragraph 6.39 to read:" The Devil's Tower on the south bank of the river is a scheduled monument."
PC26	Appendix 1 and Figure 1	Update Appendix 1 (Roles and Responsibilities) with a new section 'Litter collection' to read: "Norwich City Council collects litter both in the river and on the riverbank. This is undertaken by a monthly boat collection; the boat goes upstream and downstream of New Mills on alternate months so each section of the river gets cleaned six times per annum. The Broads Authority has no specific responsibility for

Proposed change reference	Document reference	Proposed change
		litter collection but in practice they carry out a litter sweep at the beginning of each year and then pick litter up as and when necessary when the rangers are out and about." Also amend figure 1 (Key areas of responsibility for the river corridor) to include litter collection.
PC27	App. 3	Add potential new project to Appendix 3 under 'Waterways management, access and leisure': 'Investigate provision of leisure access to Cow Tower.'
PC28	Para 7.4	Add the following text after third sentence in para 7.4: 'There is also potential to enhance the ecology of the river through any redevelopment, which should be explored, potentially including fish passage to enable migratory fish to pass upstream.'
PC29	Para 7.6	Add additional text to end of penultimate sentence in paragraph 7.6: ' and with a range of positive benefits for biodiversity and health and wellbeing.'
PC30	Para 7.6	Add new sentence following third sentence of paragraph 7.6, and amend following sentence, to read: 'Constraints also include issues with anti-social behaviour in the vicinity of the Boom Towers and City Walls which need to be addressed. However the proposal could deliver '
PC31	Para 6.34	Amend first sentence of paragraph 6.34 to read: 'There are other areas in the city centre, for example along Riverside, and at Elm Hill Gardens, whether there may be opportunities to seek to enhance open space provision adjacent to the river which will help to meet the recreational needs of the existing and growing population in the city centre and east Norwich.'
PC32	Para 8.7	Add new second sentence to paragraph 8.5: "For example Crowdfund Norwich has been set up by the city council to support community groups, social enterprises and charities to carry out a range of projects, most of which are likely to be small scale." and insert weblink to Crowdfund Norwich.

Appendix 2

