



Sustainable development panel

Date: Thursday, 18 March 2021

Time: 09:00

Venue: Remote access

Committee members:*

Councillors:

Stonard (chair)

Maguire (vice chair)

Carlo

Davis

Giles

Grahame

Lubbock

Maxwell

Stutely

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8 Five Year Land Supply Statement 2019-20 (Oral report)

To receive an oral report on the five year land stand supply.

Date of publication: **Wednesday, 10 March 2021**

Sustainable Development Panel**09:00 to 10:20****21 January 2021**

Present: Councillors Stonard (chair) Maguire (vice chair), Carlo, Davis, Giles, Grahame, Maxwell and Stutely

Apologies: Councillor Lubbock

1. Declarations of Interest

There were no declarations of interest.

2. Minutes

RESOLVED to approve the accuracy of the minutes of the meeting held on 3 December 2020

3. Local Development Scheme 2021-2023

The planner (policy) presented the report.

During discussion the planning policy team leader, answered a member's questions in relation to the acceleration of the progress of the Greater Norwich Local Plan (GNLP) and concerns about the completion of the evidence base and its soundness, housing numbers, impact of Covid-19 on the retail sector and offices, and the Western Link. The evidence base was almost complete. The cabinet report would address some areas of concern and where the plan would require further evidence and work following the consultation. There would be an opportunity to make changes to the plan. With regard to the housing needs assessment, the government had retained its current standard assessment methodology. The GNLP team had looked at housing numbers and the direction of travel indicated more housing is likely to be required. The housing buffer had been extended by 5,000 dwellings and further contingency sites identified, which would not come forward for development if not required. The public would have an opportunity to comment on the housing numbers and sites in the consultation. Members were advised that the GNLP team would need to make an assessment of the Western Link at the appropriate time. It was too early to assess the impact on changes to retail and office use from Covid-19 and the emerging government policies and changes to the planning system. The retail supplementary planning guidance would be kept under review.

The chair thanked the member for the questions and said that there were concerns about the soundness of the plan which could be flushed out through the consultation.

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

5. MHCLG's Supporting and Housing Delivery and Public Service Infrastructure Consultation

(Councillor Maguire left during this item.)

The senior planner (policy) presented the report in its three parts separately so that members had an opportunity to comment on each part of the draft response.

Part 1 Supporting housing delivery through a national permitted development right for the change of use from the commercial, business and service use to residential

The senior planner presented the draft response and apologised that she had left out two of the questions:

Q6.1 Do you think that the proposed right for the change of use from the Commercial, Business and Service use class to residential could impact on businesses, communities, or local planning authorities?

Q6.2 Do you think that the proposed right for the change of use from the Commercial, Business and Service use class to residential could give rise to any impacts on people who share a protected characteristic?

She commented that part of Q6.1 had largely been answered under Q5, but it would be important to provide a response to this question along the lines of the impact that reduced fees would have on the local planning authority (LPA) as the prior approval fee would be unlikely to cover its costs, and that it would affect the ability for LPAs to plan strategically for key areas where high streets were vulnerable. The proposed right for the change of use also presents uncertainty for businesses as there was no requirement for businesses to be vacant and the landlord could decide to convert the premises to residential at any point because they could be financially better off. In terms of communities the proposal could result in the loss of town centre uses in the high street and affect the ability of some people to meet their needs locally, especially in local and district centres. The proposal could also promote the development of homes in inappropriate places such as industrial estates.

The senior planner (policy) proposed that no comment was necessary for Q6.2.

Discussion ensued. The chair commented on the concerns about the Planning White Paper and that he considered that the response was sufficiently strong enough. For clarity, the chair asked the senior planner (policy) to confirm that the council was recommending that the government excluded conservation areas from its proposed change of use to residential and what impact it would have on our city. The senior planner (policy) confirmed that the council's response recommended that conservation areas were excluded. The design and conservation element would be covered, but if conservation areas were excluded, it would resolve a lot of the issues and protect the whole of the city centre from change of use under permitted

development rights. Most district and local centres and employment areas would not be protected.

In reply to a question about the new zones proposed in the White Paper matching up with conservation areas and the city centre, the senior planner (policy) said that it was a separate proposal for longer term planning and this consultation was on immediate changes that could be introduced. The planning policy team leader said that there was no guarantee that the White paper land use zones would be introduced at this stage.

During discussion a member raised the issue of Aviva consolidating its office use in the city centre, having closed its buildings at Broadland Business Park and increased its home working. It was considered to be a beneficial move for the vitality of the city centre where there were good transport hubs and other services available. The future of business parks was uncertain and potentially some could be converted to residential under this proposal; however, large units such as these would be difficult to convert to residential use. Members considered that it was not necessary to amend the response to reflect this.

In reply to a member's question about crèches, the senior planner (policy) explained that the proposal was the conversion to residential use within Class E rather than conversion to crèches. Conversions under permitted development rights would need to meet building regulations and fire safety was a consideration. Energy efficiency and design, which would be covered by a full planning application were not included under permitted development rights. A lot of issues could now be considered under prior approval applications but if the government were to introduce even more issues then this would have a further impact on resources as the fees were significantly lower than for a full planning application.

Members considered that there should be a response to Q6.2 relating to housing for people with protected characteristics, particularly as reports of higher mortality for people of BAME backgrounds from Covid-19 had been attributed to poor quality housing and lower incomes. Members noted that people on low incomes were more likely to be accommodated in converted premises. A member also asked for disability and age to be addressed in the response and pointed out that there was no requirement for a proportion of the residential accommodation to be accessible to people with disabilities, under permitted development.

A member commented that the fee structure was a barrier for smaller developments and encouraged larger developments as there was a cap on 50 developments. The senior planner (policy) explained that the proposed fee for permitted development was less than that of a planning application and that it did not cover officer time. The senior planner (policy) confirmed that a sentence would be added to the response requesting that there was no cap.

Part 2 – Supporting public service infrastructure through the planning system (Providing further flexibility for public service infrastructure through permitted development rights)

The senior planner (policy) presented this section of the report and the draft response.

The chair agreed with the proposed response. He commented that developers were not bringing forward sites for development or “land banking” sites until land values increased was the problem, not an inefficient planning system.

During discussion the planning policy team leader explained that the proposed right to allow public service buildings to expand facilities by 25 per cent was based on the existing footprint of the current buildings at the time the legislation was brought in and would protect playing fields. Members noted that this did not include consideration of design issues and therefore the council’s response sets out that these permitted development rights should not apply in conservation areas.

Members confirmed their support of the proposed response to the questions relating to the proposal to speed up decision making for public service developments by reducing the timescale from 13 to 10 weeks. This would require all issues to be resolved in their entirety during the pre-application process.

During discussion members sought clarification on whether this proposal applied to privately owned chains of academies and the potential to expand facilities and then use them for another purpose. Members noted that the assumption was that the proposals were for public sector schools, universities, hospitals, etc. but asked whether it would apply for fee paying schools and private institutions. The senior planner (policy) said that she would make this point in the response.

Part 3 – Consolidations and simplification of existing permitted development rights

The senior planner (policy) presented this section of the report and the draft response which recommended that rather than consolidating and simplifying permitted development rights to change to residential which often lead to poor quality housing, the government should repeal them.

During discussion, the chair expressed concern that there was a danger to future occupants of buildings that had been converted to residential use under these permitted development rights. The response should include reference to the concern that local planning authorities should not lose control of the planning system. The senior planning officer said the government had undertaken a review and introduced national minimum space standards and ensuring that there was adequate natural light (windows in all rooms) to address the issue of substandard housing, but the addition of further controls added more work for local planning authorities without the fees of a full planning application. Members considered that there was potential for a disaster to take place, such as Grenville, and that the government should look at the evidence to retain and expand these permitted development rights very carefully. Members agreed that the chair should contact the MP for Norwich South calling for the issue to be discussed at the parliamentary select committee - Housing, Communities and Local Government committee.

Following a short discussion, the panel agreed that rather than require officers to circulate the revised draft consultation response to all members, the chair would sign off the responses to Q6.1 and Q6.2 and any changes agreed at this meeting at his regular portfolio meeting next week.

RESOLVED to:

- (1) endorse the draft response to the Supporting Housing Delivery and Public Service Infrastructure consultation, subject to the chair signing off the changes as minuted above, and submit it to the Ministry of Housing, Communities and Local Government by 28 January 2021;
- (2) ask the chair to contact Clive Lewis, MP, to call on him to ask the Housing, Communities and Local Government Committee to consider the need to repeal rather than simplify and consolidate existing permitted development rights affected by the changes to the Use Class Order.

CHAIR

Report to Sustainable development panel
18 March 2021
Report of Director of place
Subject East Norwich masterplan update

Item

4

Purpose

To update members on the appointment of consultants for the East Norwich masterplan, the scope of the masterplan, and key milestones.

Recommendation

That members note the contents of the report.

Corporate and service priorities

The report helps to meet the corporate priority A healthy organisation, great neighbourhoods, housing and environment, and inclusive economy and people living well.

Financial implications

None directly arising from this report

Ward/s: All Wards

Cabinet member: Councillor Stonard - Sustainable and inclusive growth

Contact officers

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Background documents

None

Introduction

1. Consultants Avison Young were appointed by [Cabinet](#) on 10 February 2021 to produce a masterplan for the East Norwich area, which comprises the Deal Ground / May Gurney site, Utilities site, and Carrow Works (around 50ha in total). This report provides some background to the masterplan project and the procurement process, and provides a brief summary of the masterplan scope and next steps.
2. Background to the masterplan project is provided in a report to [Cabinet](#) on 10 June 2020 which noted the establishment of a new public-private sector partnership - the East Norwich Partnership (ENP) to steer development of a masterplan for the East Norwich area.
3. That report highlighted the opportunity offered by the vacation of the Carrow Works site by Britvic/Unilever to act as a catalyst for regeneration and to create a sustainable, high quality new district of the city. A council commissioned study ('A Vision for East Norwich', 5th Studio, 2018 – link provided at paragraph 6 of Appendix 1) identified potential capacity of up to 4,000 new homes and 100,000 sqm of employment space, accommodating up to 6,000 new jobs.
4. Production of a masterplan for the East Norwich sites is required to support policy in the emerging Greater Norwich Local Plan (GNLP). The Regulation 19 draft GNLP, which is currently undergoing soundness consultation, identifies the East Norwich Strategic Regeneration Area and includes a proposed site allocation for housing led mixed use redevelopment. The masterplan brief includes provision of a supplementary planning document for East Norwich to support the GNLP policy.
5. The production of the masterplan is a key project in the Town Fund programme, alongside the proposed acquisition of Carrow House by the city council, which will give it a landowner stake in the delivery of regeneration of East Norwich.

East Norwich Partnership (ENP)

6. The ENP is a public-private sector partnership led by Norwich City Council, and chaired by Cllr Stonard. The council is also the accountable body for procurement, managing relevant budgets, and project management. The ENP's purpose is for partners to work together in developing a masterplan for the East Norwich area that is deliverable, and will address the need for investment in substantial new social and economic infrastructure to unlock the development potential of the site, enabling sustainable growth in this location. Partners have secured approximately £600k funding for the masterplan work and project management costs.
7. Membership comprises: Norwich City Council, Norfolk County Council, South Norfolk Council, the Broads Authority, Homes England, Network Rail, New Anglia Local Enterprise Partnership, and landowners of the Deal Ground / May Gurney site, Carrow Works, and the Utilities sites.

Procurement of consultants

8. Following a procurement process undertaken using Homes England's Multidisciplinary Framework Panel, Avison Young have now been appointed as lead consultants. The consultant team, which commenced work on 1st March, also includes masterplanners Allies and Morrison, and has a good track record of working together on major regeneration schemes including York Central, which is of a similar scale and complexity to East Norwich.
9. The council has appointed a project manager (Tracey Coleman) and project assistant (Amy Dunham) to work with the Partnership and consultant team to drive forward the masterplan process and ensure that the Partnership's objectives are met.

Scope of the masterplan

10. The brief for the masterplan work (extract attached at Appendix 1) was developed with partner input, particularly from Homes England which has extensive experience of involvement in such projects nationwide.
11. The brief's vision includes creation of a highly sustainable new quarter of the city, with the potential to harness a range of economic, social and environmental benefits. In addition to supporting substantial housing and employment growth, the masterplan will enable exemplary development to be delivered from a sustainability point of view, including for example high quality green infrastructure, enhanced connectivity and biodiversity, sustainable transport links between the city centre and the Broads, and maximising the area's river regeneration potential.
12. The ability to deliver the brief's vision and objectives is critical: the intention is that the consultant team will develop a scheme that will attract investment in infrastructure to facilitate development and de-risk the site, and build confidence in the private sector and investor market.
13. Stakeholder and wider community engagement will be a key part of the whole masterplan process, ensuring that the masterplanning of the new East Norwich district addresses the needs of all relevant stakeholders including landowners, elected members, local residents, businesses, and community and amenity groups.
14. The masterplan will be produced in two stages. Stage 1 will involve early extensive stakeholder engagement and result in a concept masterplan based on a clear understanding of infrastructure needs, deliverability and viability. Stage 2 will involve more in-depth consideration of infrastructure and viability and will result in a refined masterplan, and a supplementary planning document to support policy in the Greater Norwich Local Plan.

Timescales

15. Key milestones for the production of the masterplan contained in the brief are set out below for information.

Milestone	Date
Stage1 masterplan inception	March 2021
Stage 1 masterplan completion	August 2021
Review of stage 1 outcomes and decision to proceed with Stage 2	September 2021
Stage 2 masterplan inception	October 2021
Stage 2 masterplan completion	March 2022

16. Work on the masterplan has now commenced. The project inception meeting took place on 4 March. One of the consultants' early actions will be to develop an engagement strategy, mapping out how the team will engage with all key stakeholders, including with elected members in the relevant local authorities, to ensure their input to the process. This is likely to be available by the end of March.
17. Sustainable development panel members will be updated with progress reports on the masterplan as it moves forward.

Appendix 1:

Extract from Invitation to Tender document for the East Norwich Masterplan (25 November 2020)

Introduction

The purpose of this Invitation to Tender is to award the call off contract for the above project/commission. We ask you to respond to the questions detailed in the [Evaluation Section](#) below using the [Response form](#), (although suppliers are permitted to use their own response form) and to submit your Pricing using the Resource/Pricing schedule provided.

Background

1. East Norwich presents the city of Norwich with a regeneration opportunity that will be transformational. East Norwich, comprising the Deal Ground/May Gurney site, the Utilities site and Carrow Works, is located in close proximity to Norwich's thriving city centre and adjacent to and part within, the Broads National Park.
2. In addition to its unique location, East Norwich's potential is created by the assets that lie within the sites – for example, the remains of the 12th century Carrow Abbey, fine listed buildings, remarkable trees and gardens, extensive frontages to navigable rivers, and the natural wetland habitats – which all provide a valuable backdrop to the opportunity to create a new part of the city of remarkable quality.
3. With a rich history, Norwich is an ancient city that lies at the heart of rural East Anglia, and one of the largest walled cities in medieval England. Norwich has a long history of being a radical, innovative city. Identified by think-tank Centre for Cities as one of the five 'fast growth cities', Norwich is increasingly recognised for its strong economy, quality of life and vibrancy. The [2040 Norwich City Vision](#) sets out the five themes which form the foundation of a shared vision for the city - a city that is creative, fair, liveable, connected and dynamic. The urban renewal of East Norwich should be guided by these themes and should achieve exemplar design quality and setting, integration of the site with its historic context, the need to enhance the setting and create a unique sense of place that complements the existing.
4. The sites individually face challenging barriers, including costs associated with provision of social (eg. schools and community facilities) and economic infrastructure (eg. transport and utilities), but through taking a comprehensive and strategic approach to their development there is the potential to overcome the constraints and to create an exciting, green and productive quarter for the future growth of the city.

5. Norwich City Council has been committed to maximising the regeneration potential of East Norwich for many years. This includes involvement in and commissioning of a number of evidence studies set out in Appendix C and determination of planning applications, details of which are set out in Appendix D. There is now a general consensus among the key landowners / developers for the individual sites and other relevant local planning authorities (including Norfolk County Council, the Broads Authority and South Norfolk Council) that a masterplan should be progressed to ensure comprehensive regeneration of this new urban quarter of the city. This has the potential to deliver significant new housing and employment, and act as a catalyst for regeneration of both East Norwich and the wider city. Deliverability of a masterplan is key to the requirements of this brief.
6. The council commissioned a study to explore the opportunities for wider regional regeneration when the Carrow Works site became available, ['A Vision for East Norwich', 5th Studio, 2018](#). This study identifies the release of Carrow Works as presenting a 'once in a generation' opportunity to address the challenges of the three sites strategically. It sets out a vision for East Norwich as a new productive quarter for the future growth of the city, linking the city centre with Whitlingham Country Park and The Broads National Park network. It envisages that the quarter could provide up to 4,000 new homes and 100,000 square meters of employment space, accommodating up to 6,000 new jobs.
7. This stated growth ambition represents a significant quantum of development. The anticipated housing growth of up to 4,000 new homes would represent over 40% of housing growth envisaged for Norwich in the Regulation 18 GNLP, 13% of growth for the Norwich Urban area, or about 9% of growth for the whole Greater Norwich area, while the anticipated jobs growth would represent over 18% of the Regulation 18 GNLP's jobs growth target.

The Masterplan

8. Norwich City Council is seeking a suitably qualified and experienced team with a range of expertise and a proven track record of providing ambitious design, planning, engineering services with the appropriate commercial expertise to ensure that deliverability is the key focus throughout the design process and that the masterplan will result in a deliverable scheme.
9. The informal East Norwich Partnership ('the partnership') has been formed to oversee the production and implementation of the masterplan. The Partnership is led by the City council and its members include relevant public and private sector stakeholders¹.

¹ The East Norwich Partnership membership comprises Norwich City Council, Norfolk County Council, Homes England, New Anglia Local Enterprise Partnership, the Broads Authority, South Norfolk County, and landowners for the Utilities site, Carrow Works and Deal Ground / May Gurney site.

10. The masterplan is being funded by key East Norwich landowners and public sector bodies. It will set out a viable and deliverable vision for East Norwich in the short, medium and longer term to inform development of the GNLP.
11. The masterplan is intended to achieve the co-ordinated delivery of a sustainable residential led mixed-use gateway quarter for East Norwich with associated transport, social and community infrastructure, services and employment, resulting in a mixed community and liveable place.
12. Significant work including evidence studies has been undertaken to date on parts of the site and can be used to help to inform masterplanning. However, this should not constrain the exploration of further options for good place-making and high-quality design.

Vision for East Norwich

13. The 5th Studio Vision for East Norwich study referred to above forms the starting point for the emerging vision for East Norwich. The emerging vision has also been informed by the GNLP (specifically policy 7.1 in the Regulation 18 draft plan), and is summarised below:

Emerging Vision

14. East Norwich will become a **highly sustainable new quarter** of for the City, accommodating substantial housing growth and optimising strategic economic benefits. It will be an **inclusive, resilient and safe community** in which people of all ages have good access to **high quality homes that meet housing needs, and to strategic and local employment opportunities**; can **interact socially in green spaces** and in new community facilities; and have the opportunity for **independent, healthy and active lifestyles**. The new quarter will link the city centre with the Broads, and deliver **exemplar design**. The area's **riverside regeneration potential** will be maximised to achieve a distinct sense of place with enhanced opportunities for river-based activity. The site has the ability to **facilitate improved public transport**, including rail services, which will benefit East Norwich and the city generally.
15. The emerging **development objectives** for the masterplan include:
 - The creation of a highly connective network, opening up and enhancing the existing biodiversity in the River Wensum and establishing a 'green grid' of characterful landscape spaces, integrating existing pockets of significant green space and introducing new areas, to create a sequence of

gardens that lead from city to The Broads and to enhance connectivity and biodiversity;

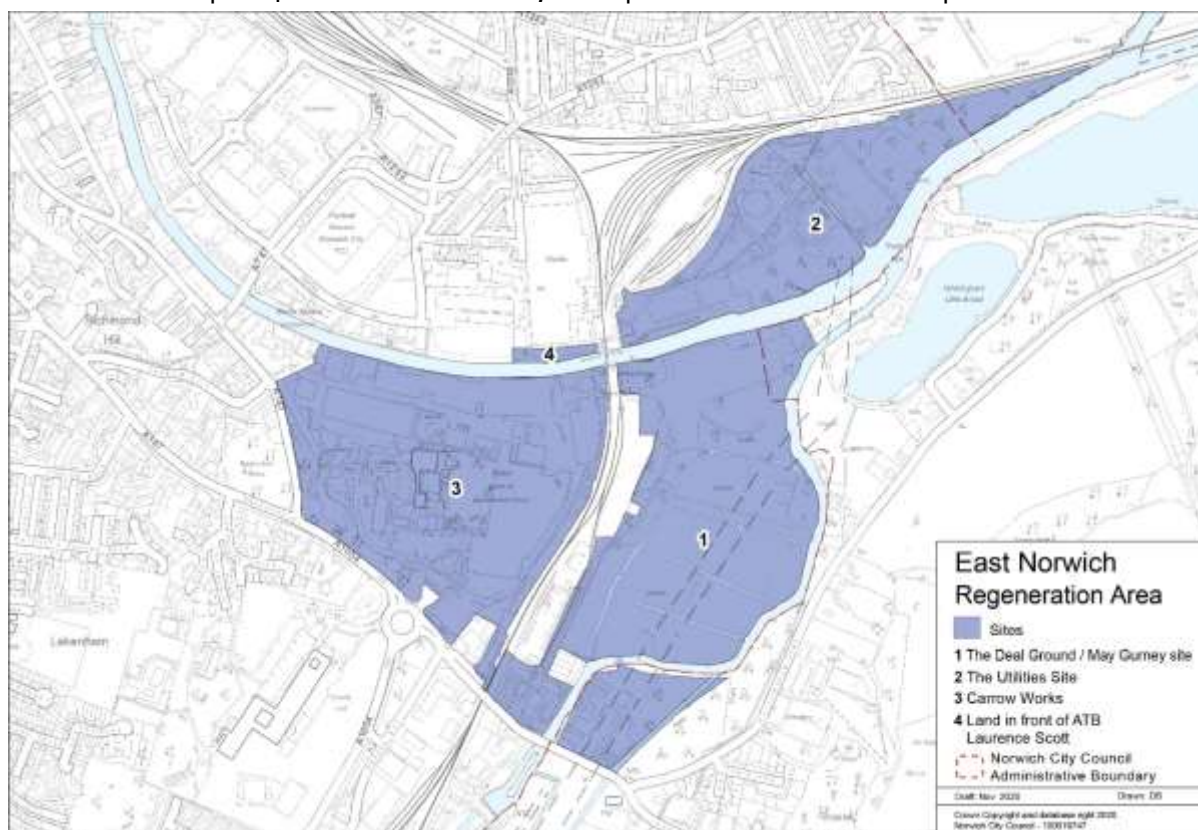
- A diverse new quarter making the most of existing building stock on the Carrow Works site (including a number of fine listed buildings). This ready-made diversity, together with high-quality urban design and new architecture, could accommodate a rich cultural mix of living with a range of tenures, retail, leisure spaces, extending Norwich's independent spirit while supporting opportunities for skilled jobs and economic development;
- Ensuring that the masterplan addresses the implications of a potential replacement of the Trowse rail bridge that improves the rail infrastructure, enabling 'Norwich in 90' rail connections to London and enhancing linkages with Cambridge and Oxford;
- Promotion of a low car environment, supported by an excellent walking and cycling network that connects the city to The Broads. The development will promote healthy streets and healthy living principles;
- Provision of site-wide infrastructure to allow the introduction of a low-carbon shared heating, cooling and power network, as well as excellent digital connectivity;
- Protection and enhancement of the sites' and wider city's rich heritage assets (both designated and undesignated) and their settings, and the conservation areas included within the site, in accordance with policy in the Greater Norwich Local Plan;
- Ensuring that the potential of the sites' riverside location is fully realised and contributes significantly to regeneration of the river corridor; and
- Integrated sustainable urban drainage and use flood plain remodelling to create 'room for the river' - including storm water storage and wetlands around the River Yare.

16. In preparing a deliverable masterplan, the successful consultant team will need to further develop, test and refine the vision and development objectives to ensure they inform a deliverable masterplan and identify and cost the significant infrastructure and investment required. Deliverability is central to the requirements of this brief.

Site Information

17. East Norwich strategic regeneration sites extends some 50 hectares and comprises three key sites – see plan below.
- Deal Ground
 - Utilities Site
 - Carrow Works
 - The unshaded area in the middle is the Trowse Railhead.

18. The sites are identified as the East Norwich Strategic Regeneration Area within the emerging (Regulation 18) Greater Norwich Local Plan (GNLP) under policy 7.1 which envisages a minimum of 2,000 homes in the plan period. (This designation also includes a strip of land to the front of ATB Laurence Scott on the north bank of the river which is subject to an access agreement and considered essential for the delivery of sustainable transport links to the three sites.) The client team however is seeking to further maximise the development potential of the site such that it delivers up to 4,000 homes and 100,000 sqm of commercial floor space.



19. The East Norwich sites are in a variety of ownerships and suffer from a range of constraints including restricted access and connectivity, and the costs associated with strategic infrastructure including new bridges and roads to serve the sites, a potential new school, sustainable transport infrastructure and key public realm areas needed to facilitate development and de-risk the site. Other constraints include a need to manage traffic impact on the strategic road network in this part of the city which has limited capacity, to address and mitigate environmental impacts from adjacent activities and site contamination, to address key areas of landscape and biodiversity value and the setting of listed heritage assets, to address and mitigate flood risk, and to address navigation rights in relation to the River Wensum part of the Broads network. In addition the site is directly adjacent to the safeguarded Trowse Railhead (see paragraph 40).
20. These constraints, and in particular the costs associated with strategic infrastructure, have hindered the Deal and Utilities sites from coming forwards previously. The strategy now proposed is for the consultant team to develop a

scheme that will attract funding to invest in infrastructure as a means of facilitating development and de-risking the site, therefore building confidence in the private sector developer/investor market.

21. The Carrow Works site has recently become available for redevelopment following its vacation by Britvic / Unilever. This presents an opportunity to strategically unlock development on the wider East Norwich sites, including the Deal and Utilities sites, and significantly increasing the scale and ambition of development that can be achieved, with the potential to attract significant public sector investment in the infrastructure needed to ensure delivery.
22. The development of the East Norwich sites will inevitably impact upon areas outside the site boundaries shown in the plan above, including the city centre, train station and wider east Norwich area. The development offers opportunities to greatly improve connectivity between the sites and the wider area through improved cycle and pedestrian links, and potentially through improved transport infrastructure. It should be noted that Network Rail, which has expressed an interest in being a partner in this process, owns land both within and in the vicinity of the sites, and is currently working on an estates strategy for its landholdings. Whilst not included in the Masterplan area, it is acknowledged that there will be due consideration given particularly to the Lower Clarence Road site² and Riverside Freight site owned by Network Rail given they are linked to key areas that fall within the Masterplan area. It will therefore be essential for the consultants to liaise with Network Rail in addition to other key stakeholders during the masterplan development process.
23. The development of the East Norwich sites also provides an opportunity for synergy with potential improvements to the Trowse railway bridge, with a number of potential regeneration benefits. The Trowse railway bridge is currently the only lifting bridge on the mainline electrified rail network in the UK and the only single track stretch of the Norwich to London railway line. New Anglia Local Enterprise Partnership has formed a working group of local partners including Norwich City Council, Norfolk County Council, the Broads Authority and Greater Anglia, to work with Network Rail in making a case for investment in the bridge infrastructure and investigate options for the bridge improvements. Failure to improve this key piece of rail infrastructure would severely limit the ability of the city to be served by East West Rail following completion of planned improvements to the connection between Cambridge and Bedford and the junction at Ely. Improvement to the railway bridge, in addition to delivering improved rail performance and increased speeds and punctuality, would have potential benefits for transport and wider regeneration by providing improved access to the development sites, including under the approaches to the bridge on both sides of the Wensum. This increased east-west connectivity across the railway may significantly improve access to the

² Currently allocated in the Norwich Site Allocations Plan under policy CC13 and is proposed to be carried forward into the Regulation 19 GNLP.

East Norwich sites and hugely improve access to the Broads and green infrastructure for much of the city's population. It is therefore critical that the future of the bridge is fully taken account of in masterplanning the regeneration of East Norwich. As part of this the masterplan must also consider navigation rights in relation to the River Wensum part of the Broads network arising from any new fixed rail bridge, taking into account the British Railways (Trowse Bridge) Act 1985 . Further background and details for the Trowse Rail Bridge project are set out in a position statement included in Appendix C. A number of maps have been produced providing an overview of the Site which are included in Appendix C. It should be noted that maps 5-8 are indicative only and do not provide comprehensive information on all constraints.

- Map 1 : The Masterplan area
- Map 2: Aerial photo of the site (2016)
- Map 3: Local authorities administrative boundaries
- Map 4: Site ownership
- Map 5: Heritage environment
- Map 6: Natural environment
- Map 7: Flood risk
- Map 8: Environmental constraints

Development Background & Progress to Date

24. Much work has been carried out to date to investigate barriers to opportunities for redevelopment of the allocated (in the current adopted Local Plan) Deal Ground site and Utilities site in East Norwich, including evidence studies and information produced to support planning application proposals.
25. As noted above, the council commissioned a study to explore the opportunities presented by development opportunities in East Norwich: ['A Vision for East Norwich', 5th Studio, 2018](#). This study sets out a vision as summarised above, and identifies the potential for a significant level of mixed use development on the three sites. However, it is important to note that this level of development has not been tested with regard to technical constraints, economic market conditions, and the full range of planning requirements.
26. Appendix C details relevant planning applications for the Deal Ground / May Gurney site and the Utilities site, while Appendix B provides information about relevant evidence documents.
27. The Deal Ground/May Gurney site is subject to an extant consent for a comprehensive housing-led redevelopment scheme (12/00875/O). To date reserved matters applications have not been submitted in connection with this consent and no start has been made on the construction of the primary road infrastructure.

However, the landowners have secured removal of electrical pylons and overhead cables a pre-condition for development on parts of the site.

28. In 2015 the Utilities site was the subject of a planning application for comprehensive mixed used development including a biomass fuelled energy centre. This application ref. 15/00997/F was withdrawn.
29. Developments on both sites were screened as requiring environmental impact assessments and both applications were accompanied by environmental statements.
30. Britvic / Unilever have entered into an agreement for the sale of the Carrow Works to a private sector developer - Fuel Properties – as of October 2020. The site is currently a designated employment site having been a location of food and drink manufacturing in Norwich for well over a century. It is a requirement of the land agreement that the developer will submit a planning application for the mixed use scheme within an agreed timeframe. It is expected that a scheme for Carrow Works will be the subject of early pre-application engagement with the council over the coming year. There is therefore the expectation of collaboration and information sharing between the masterplan consultants and the Carrow Works team.
31. As referenced above the East Norwich landowners have developed aspirations for their individual sites so it will be essential that the masterplan consultants engage with them to fully understand their aspirations as part of the stakeholder engagement process.

Planning policy and wider economic context

32. The intention is that the masterplan will inform policy in the emerging GNLP, supporting the allocation of the sites, particularly at submission and examination stage, and forming the basis of a supplementary planning document for adoption by local planning authorities which will form the basis of future planning applications to ensure comprehensive delivery. Given the impact of the proposed revision to the standard method for establishing housing need (the subject of a MHCLG consultation in August – October 2020) the GNLP is currently progressing under transitional arrangements to Regulation 19 consultation in February – March 2021, with submission to the Secretary of State anticipated in July 2021 and public examination by the end of 2021.
33. The overarching policy context relevant to this project is the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance. The delivery strategy will be expected to accord with the principles of the NPPF, as well as the local policy documents referred to below.
34. The majority of the area covered by the East Norwich sites falls within Norwich City Council's administrative area, with some land within Broadland District Council and South Norfolk Council administrative boundaries, and some within the Broads Authority area for planning purposes.

35. The current planning policy framework in Norwich comprises:
- The [Joint Core Strategy for Broadland, Norwich and South Norfolk](#) (JCS) adopted 2011 and amended 2014.
 - The [Norwich Site Allocation and Site Specific Policies Plan 2014](#) (Site Allocations plan)
 - The [Norwich Development Management Policies Local Plan 2014](#) (DM Policies plan)
36. The JCS is the key planning policy document for Greater Norwich, setting out the broad vision for the growth of the area and containing the policies for the period 2008-2026. The strategy contains a spatial vision and main objectives setting out the wider plan for homes and infrastructure, and also more specific policies (such as policies 11 and 12) which make specific reference to what is expected from development in Norwich. Policy 12, in particular, refers to the major physical regeneration possibilities of the East Norwich sites.
37. Both the Deal Ground and the Utilities Site are already allocated within the Norwich Site Allocations Plan for major residential-led mixed-use development (policies R9 and R10). The policies contained within this plan set out preferred uses for the allocated sites and highlight particular requirements of and challenges to development. The Carrow Works site is not currently allocated in this document as it was occupied and operational at the time the plan was prepared.
38. The DM Policies plan provides detailed planning policies to help deliver the JCS and to guide how the council responds to planning applications for new development in the city. As outlined in paragraph 10, there are many site (and wider) constraints which present challenges to bringing forward East Norwich for development. The policies contained within the DM Policies plan cover issues relating to heritage, flood risk, protection of the natural environment, protecting access, transportation etc. in more detail and will need to inform the policy context analysis of the delivery strategy and masterplan.
39. Emerging policies contained within the draft GNLP are also relevant. The GNLP will build upon the strategic policies contained within the JCS to plan for growth and development in Greater Norwich until 2038. The GNLP contains overarching strategic policies and site-specific allocation policies (subject to a process of sustainability appraisal). Once adopted, the GNLP will replace the JCS and Site Allocations plan. Particular consideration should be given to policy 7.1, which identifies East Norwich as a strategic regeneration area, as well as site-specific policies GNLP0360, GNLP3053 and R10. The GNLP completed its [Regulation 18](#) public consultation in spring 2020. As noted above it is anticipated that the Regulation 19 Draft Plan will be published for consultation in February/March 2021. It is anticipated that the housing allocation for the East Norwich Strategic Regeneration Area is likely to increase significantly in the Regulation 19 Draft Plan.
40. As the East Norwich sites cross administrative boundaries, the masterplan will need to take account of the current and emerging planning policies relevant to the adjacent local authorities of the Broads Authority and South Norfolk District

Council, with particular reference to Broads Authority policy NOR1. The masterplan will also need to take account of the Norfolk [Core Strategy and Minerals and Waste Development Management Policies Development Plan](#) (2011) which safeguards a railhead adjacent to the sites.

41. [The Norfolk Strategic Planning Framework](#) (NSPF) provides a structure for addressing cross-boundary planning issues across the county, especially those which have a strategic impact across local authority boundaries. It includes guidance relating to housing, economic growth, infrastructure and the environment, and informs the local plans produced by each of the partner authorities. The delivery strategy will need to consider the contents of the NSPF to ensure the delivery of East Norwich is in accordance with the agreements made by the partner authorities across Norfolk.
42. The recently published Planning White Paper ('Planning for the Future', MHCLG, August 2020) proposes major changes to the planning system including the introduction of a zoning system, In particular Growth zones where major new development is anticipated, such as East Norwich. Allocations in Growth zones would be expected to be supported by masterplans and design codes to support the site specific policies. Although there is much uncertainty about the eventual outcome of the White Paper consultation, the proposed approach underscores the importance of masterplanning and the urgency for delivering a masterplan for east Norwich based on robust evidence.
43. Other relevant city council led strategies include:
 - The [Norwich 2040 City Vision](#) has been produced by the city council in collaboration with other stakeholders. It sets out how the challenges facing the City will be addressed over the coming years. The Masterplan will need to address how the development of East Norwich can contribute to the main themes and objectives of the 2040 City Vision.
 - Given the East Norwich sites' riverside location, the masterplan should also take account of the objectives and policies of the [River Wensum Strategy \(2018\)](#) which seeks to regenerate the river corridor. The strategy has been prepared by a council led partnership involving the Broads Authority, Norfolk County Council, Environment Agency and the Norwich Society.
44. The masterplan also needs to reflect and respond to broader economic and regeneration objectives for Norwich, Greater Norwich and the wider region as set out in the following key documents:
 - The New Anglia Local Enterprise Partnership's (NALEP) [Economic Strategy for Norfolk and Suffolk](#) outlines ambitious plans for new growth across this region. Norwich and the Greater Norwich area are acknowledged as priority places where there are significant opportunities and commitment for continued growth. The Economy Strategy's ambitions include the attraction of high growth businesses, supporting a high performing productive economy, and delivering infrastructure to enable the creation of places where people want to live and work.
 - The draft [NALEP Local Industrial Strategy](#) sets out actions to drive productivity and growth across the economy as a whole. It identifies the potential of Norfolk

and Suffolk as a 'globally recognised, technology-driven, creative and inclusive economy which is leading the transition to a post-carbon economy through sustainable food production and sustainable energy generation'. Clean growth is at the heart of the LIS and the ambition to tackle the challenges and opportunities of climate change. The LIS also recognises the importance of underpinning sectors in the Norfolk and Suffolk economy, including construction and development, highlighting the potential for specialisation in Passivhaus and sustainable design. Infrastructure delivery is a key theme, including the pursuit of opportunities for modal shift and active travel which will be critical in delivering clean growth. The LIS acknowledges that many development sites will require infrastructure provision to enable them to be brought forward for development and notes the commitment of local partners to building the right housing and commercial space where it is needed with quality design and integrated infrastructure, with the aim of building sustainable communities.

- [The NALF Norfolk and Suffolk Economic Recovery Re-start Plan](#), sets out key actions in the short term to help the region's economic restart after the COVID-19 pandemic. Under the theme of Infrastructure it highlights actions to accelerate delivery of integrated transport priorities to reduce the need to travel and encourage modal shift. It also identifies the need to revive Norwich as a thriving economic engine for the wider region whilst ensuring that growth happens inclusively and sustainably. It notes that investment through the Town Deal and Transforming Cities (see below) will complement existing collaborative work toward the shared vision of a connection, creative, dynamic, fair and liveable city.
 - Norwich City Council COVID-19 Recovery Plan '[Blueprint for Growth](#)' was published in June 2020. It sets out a number of themes and actions to provide a blueprint for recovery which includes commencing the masterplanning process for East Norwich as the biggest regeneration opportunity in the East Of England, acknowledging its potential for significant housing and employment growth.
 - Norwich City Council [Economic Strategy](#) 2019-24 provides a five-year framework for the development of the sustainable and inclusive growth of Norwich's economy, and will help achieve the council's priority of 'a prosperous and vibrant city'. Priorities include increasing productivity and competitiveness, increasing skills and employment, developing the necessary physical infrastructure to unlock economic growth whilst maintaining and improving quality of life, and raising Norwich's profile a place to invest and do business in, and to work, live and visit.
45. In addition the Greater Norwich authorities have recently had confirmation of £32m government funding for sustainable transport through the Transforming Cities Fund. This will deliver infrastructure improvements to walking, cycling and public transport and has triggered an additional investment of £18m from First Eastern Counties in its bus fleet and local services. All projects will be delivered through the Transport for Norwich partnership.
46. Norwich City Council has recently been offered a Town Deal of up to £25m through the government's Town Fund to boost the local economy, get more homes built and support local businesses. The development of a masterplan is a key project within the Town Deal Investment Plan.

Scope of the Appointment

47. The lead consultant will oversee the appointed project team as well as utilise specialist sub-consultants as required throughout the project. The appointment of any sub-consultants will need to be approved by the partnership. It is expected that the lead consultant will be able to demonstrate the ability to partner with a Masterplanning team capable of delivering a high quality scheme with exemplar/excellent design quality. If sub-consultants are not on the Homes England Framework, they will need to be appointed by the Lead Consultant following sign off from the client. The consultant team will report to a project manager appointed by the client as required.
48. The council anticipates progressing the project in three stages summarised below. This commission is for Stage 1 and Stage 2 only. When submitting proposals, consultants are expected to address how they propose to carry out these stages by providing a clear project specific methodology.
49. Progression to Stage 3, if required, will be subject to further approval.

Stage 1

50. The outcome/ deliverable of Stage 1 is a concept masterplan, based on a preferred option, for the East Norwich area (endorsed by all key stakeholders, including landowners) which provides a clear understanding of the strategic infrastructure needs and other abnormal costs and the impact of this on the deliverability and viability of the scheme. It is envisaged that this will be achieved through an iterative process.
51. The Stage 1 process needs to support the Client group in deciding on the preferred scheme.
52. Stage 1 of the commission is expected to follow steps outlined below.
 - a) Base line and review of existing project evidence (including a review of responses to the GNLP Regulation 18, and subsequently Regulation 19, consultations in relation to relevant policies), identifying gaps requiring more detailed assessment work, and advising how and when this should be completed.
Note- A list of the evidence base documents is included in Appendix C.
 - b) Contextual analysis and analysis of site opportunities/constraints which will impact on the ability to develop the area comprehensively.

- c) A high level market assessment to identify suitable development mixes (residential, employment, tenure type, density etc) for consideration in development scenarios as part of discussions with landowners.
 - d) Identifying key project risks that may require further investigation (eg intrusive surveys) beyond the scope of this commission.
 - e) By working with the partnership, key stakeholders and the local community, to review and refine the emerging vision and development objectives.
 - f) Developing a number of scenarios (concept masterplan options) based on the above steps, together with strategic viability and deliverability assessment of each to inform a preferred concept Masterplan option. The number of scenarios, and what they are, including the level of detail in the concept masterplan options, need to be agreed with the client at an early stage in the process.
 - g) Develop the concept Masterplan to include:
 - A land use strategy:
 - A transport, access and movement strategy:
 - Utilities & services strategy
 - A drainage strategy,
 - A landscape, green infrastructure and public realm strategy, to include a waterspace strategy to ensure the development responds effectively to the sites' unique riverside location and maximises potential for regeneration of the river corridor
 - A social and community infrastructure strategy
 - A heritage and townscape strategy
 - h) An overall development framework
 - i) A summary of deliverability and strategic viability, including gaps in viability.
53. Integral to the Stage 1 work (and continuing into Stage 2) will be the development and implementation of an engagement strategy, in accordance with GDPR requirements. At Stage 1 this process will involve working closely with the elected members and landowners to ensure consensus on the development scenarios and the preferred option; with key stakeholders including statutory consultees to achieve their buy-in to the process and to ensure that technical issues are satisfactorily addressed; and with the wider community and community groups to ensure that they help further refine and shape the masterplan vision, objectives and outcomes. .
54. The Stage 1 Report is required to be completed, approved and signed off by the client, prior to commencement of more detailed work in Stage 2. The consultants must commence discussions on the content of the Stage 1 Report with the client at an early stage to ensure that the content is agreed before it is finalised for sign-off.

Stage 2

55. The outcomes/ deliverables of Stage 2 are:

- An infrastructure Delivery Plan and a further refined Strategic Viability Assessment of the preferred option, including a high-level strategy for funding and financing, to inform further refinement of the masterplan and its delivery
- A refined masterplan developed through an iterative process.
- Evidence to inform the basis of future planning applications
- The evidence base to support the allocation of East Norwich in the emerging Greater Norwich Local Plan including the Regulation 19 Submission and at public examination
- A Supplementary Planning Document for East Norwich capable of being adopted by the council.

56. The Stage 2 work is expected to include the following components:

- a) Infrastructure delivery plan building on the work in Stage 1 to set out the physical, social and economic infrastructure that will be required to deliver concept masterplan. This should
 - Identify the type and scale of infrastructure required , including road and rail bridges
 - Produce costing and phasing plans for each item of infrastructure
 - Identify triggers related to development phasing
 - Clarify how cost will be apportioned between developers / development parcels and what collection mechanisms can be utilised
 - Identify the scale of any funding gap
 - Clarify responsibility for delivery and potential sources of funding.
- b) Further refined strategic viability assessment, including a high level funding and financing strategy, to address the wider deliverability of East Norwich, taking into account infrastructure requirements. This should be based on the agreed preferred option from the concept masterplan.
- c) Planning & Delivery Strategy to set out details of how outline and detailed applications will be brought forward to gain planning permission.
- d) Continued engagement with key stakeholders including elected members, landowners, statutory consultees and special interest groups etc, as required to inform further refinement of the masterplan. The wider community will be engaged through public consultation on the SPD, referred to below.
- e) Preparation of a Supplementary Planning Document (SPD) supported by
 - Strategic Environmental Assessment Screening and Scoping reports (SEA)

- Habitats Regulations Screening Report, and Scoping report if required (HRA)
- Equality Impact Assessment (EQIA)

The consultant will also be required to prepare for and support the council with public consultation on the draft SPD, in accordance with the Statements of Community Involvement of the relevant planning authorities, and incorporate comments into the final SPD including a Consultation Statement.

57. Consultants should be prepared to provide evidence to and appear at the GNLP public examination in relation to local plan policy for the East Norwich Strategic Regeneration Area and site specific allocations. This will be additional to this commission and should not be costed into the tender price. Costs will be based on an hourly rate which should be included in the tender response.

Stage 3 (for information only)

58. Preparation of a detailed business case to unlock enabling funding to ensure successful delivery of the overall scheme.

Additional Services

Project Management and Meetings

59. A Project Initiation Document (PID) shall be prepared within 2 week of the commencement of the commission. The PID will provide details of:
 - a governance structure to ensure that lines of communication and decision making are clear,
 - a work programme setting out sequencing and interdependencies in relation to milestones and timescales including the consultation and engagement strategy,
 - a resource and sub-contracting schedule,
 - key milestones
60. Arranging and chairing fortnightly Project Team Meetings (PTM) with the partnership including:
 - preparation and distribution of agendas, minutes,
 - project programme,
 - cost / spend profiles and forecasts for the commission,
 - risk register, issues and action logs at all stages of the project.
61. PTM will be attended by the lead consultant and project manager and other key sub-consultants, depending on the stage of the project. These meetings will take

place in Norwich (location to be confirmed) or virtually, as appropriate. Submissions should clarify the cost difference of each approach.

Programme

62. Key delivery milestones include:

Milestone	Date
Appointment Multidisciplinary consultant team	February 2021
Stage1 masterplan inception	March 2021
Stage 1 masterplan completion	August 2021
Review of stage 1 outcomes and decision to proceed with Stage 2	September 2021
Stage 2 masterplan inception	October 2021
Stage 2 masterplan completion	March 2022
Review Stage 2 and decide on whether to proceed with Stage 3	April 2022

Report to Sustainable development panel
18 March 2021
Report of Director of place
Subject Revised Norfolk Strategic Planning Framework

Item

5

Purpose

To consider the revised Norfolk Strategic Planning Framework (NSPF) and whether to recommend to cabinet to endorse it.

Recommendation

To recommend that cabinet endorses the revised Norfolk Strategic Planning Framework.

Corporate and service priorities

The report helps to meet the corporate priorities a healthy organisation, great neighbourhoods, housing and environment, people living well and an inclusive economy

Financial implications

The city council's share of costs undertaking the preparation and review of the NSPF is met from existing budgets.

Ward/s: All Wards

Cabinet member: Councillor Stonard - Sustainable and inclusive growth

Contact officers

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Background documents

[Climate Change and the Planning System](#)

[Norfolk Strategic Planning Framework – Shared Objectives for extending 4G coverage and the rollout of 5G infrastructure in the County of Norfolk](#)

Report

Introduction

1. In preparing Local Plans, local authorities are subject to a number of legal and regulatory requirements. Councils must discharge a legal duty to co-operate with neighbouring authorities in relation to strategically important and cross-boundary issues. The aim of the duty to co-operate is to achieve better planning outcomes.
2. The Norfolk local authorities have a strong record of working together. Previously Norwich, Broadland and South Norfolk councils prepared a joint local plan (the Joint Core Strategy) covering all three authority areas, and are currently collaborating to produce the Greater Norwich Local Plan.
3. In 2015, a formal county wide Strategic Planning Member Forum was established to ensure that the duty to co-operate was effectively discharged. All authorities in Norfolk, including Norfolk County Council, participate in the forum which is supported via an officer team drawn from the councils. The forum sought and gained agreement from each of the partner authorities to prepare a joint planning framework document. The city council's cabinet resolved to agree to co-operate on strategic planning matters through the preparation of a shared non-statutory strategic framework, the Norfolk Strategic Planning Framework (NSPF) in March 2015 (the Statement of Common Ground).
4. The original version of the NSPF was agreed to and endorsed by cabinet in February 2018. The framework was subsequently revised and cabinet agreed to the [updated version of the NSPF¹](#) in September 2019.
5. The NSPF has been revised further to ensure that it is kept up to date and to ensure that the duty to co-operate continues to be discharged. The revised version was presented to the Norfolk Strategic Planning Member Forum in December 2020 and again in January 2021. The revision takes into account comments made at the Member Forum meetings, with the inclusion of subsequent officer amendments to provide additional clarity around the role of the Marine Management Organisation and further information on Green Infrastructure. The proposed revised version of the NSPF is attached at Appendix A.
6. As part of the government's proposed reforms set out in the Planning White Paper, there are proposals to abolish the Duty to Co-operate but there is no clear indication of the future approach to strategic planning beyond a proposal that local authorities can participate in joint planning arrangements "to agree an alternative distribution of their [housing] requirement". In its response to the consultation on the White Paper, which was reported to [SD Panel in October 2020](#), (Sustainable development panel, 1 October 2020). Norwich City Council raised concerns that without a strategic planning framework it is difficult see how strategic cross boundary issues are going to be effectively addressed and

¹ <https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/strategic-member-forum/latest-endorsed-version-of-the-norfolk-strategic-planning-framework.pdf>

how sustainable patterns of development will be achieved. As such, the continued cooperation between the Norfolk authorities in updating the NSPF is considered central to securing better planning outcomes.

7. It was not considered appropriate to undertake public consultation on the revision of the NSPF owing to the technical nature of the changes and the level of stakeholder engagement. In addition, there is no requirement to hold a public consultation for a Statement of Common Ground such as the NSPF. Furthermore it was important that the revised version of the NSPF be endorsed in good time in order to support Local Plan preparations being expedited due to proposed planning reforms.

Revisions to the Framework

8. The main changes proposed to the NSPF include:
 - a) Changes have been made to the vision and objectives to highlight the importance of the New Anglia Covid-19 Economic Recovery Restart plan and the wider health considerations of the county's residents.
 - b) Section 5 (The Economy) has been re-organised and specific reference is made to the New Anglia LEP Local Industrial Strategy and Covid-19 Economic Recovery Restart Plan.
 - c) Reference has also been added to section 5 (The Economy) highlighting the opportunity a clean/green economic recovery presents for the county, as well as the opportunities for life sciences and bio-tech, IT and digital creative services, the visitor economy, and construction and manufacturing sectors.
 - d) Within section 6 (Housing) information on elderly people's accommodation has been updated to incorporate findings from the Norfolk Older Persons Accommodation Study. The study contains information on the range of housing types required to meet the needs of older people ranging from conventional housing to higher support housing (such as nursing homes). Section 6 has also been updated with information on how student accommodation contributions to housing delivery are calculated.
 - e) New information has been added to section 7 (Health) strengthening the local authorities' commitments to planning for a healthier environment.
 - f) A new section on Climate Change (section 8) has been inserted incorporating work undertaken by an officer's sub-group. This work focuses on what local plans and the wider planning system can do to help address climate change.
 - g) Section 9 (Infrastructure and the Environment) has been updated to include reference to work being undertaken in collaboration with Water Resources East (WRE) to help safeguard a sustainable supply of water for the region that is resilient to future challenges. Information has also been inserted into section 9 covering coastal and marine planning.
 - h) Significant changes have also been made the telecoms subsection (Section 9) following progress with 5G rollout

- i) The Flood Management and Green Infrastructure section (Section 9.9) has been amended to incorporate work and outcomes of the officer sub group and the Green Infrastructure Recreational Avoidance and Mitigation Study (GI RAMS)
9. The above changes have led to a number new agreements or amendments to existing agreements:
- a) New Agreement 8 has been added asking authorities to work positively to assist the New Anglia Covid-10 Economic Recovery Restart Plan
 - b) A new agreement on climate change (Agreement 19) that the authorities agree that climate change is an urgent, strategic cross boundary issues which will be addressed at the heart of Local Plans has been included. The agreement also states that the authorities will give consideration to the approaches in the Climate Change supporting documentation when the relevant policies are next being reviewed and updated
 - c) New Agreement 20 has been included to highlight that a number of climate change initiatives may be best addressed via a Norfolk-wide Design Guide. The Norfolk authorities agree to work together to investigate the production of such a guide with climate change best practice guidance included. This work will also support healthy living initiatives. The aim of the guide would be to provide high level principles rather than details on local vernacular etc.
 - d) Agreement 21 has been added to support the ongoing work with WRE.
 - e) Agreement 24 has been added to support the high speed broadband provision in emerging local plans. The Norfolk authorities will consider the extent to which they could require high speed broadband to be delivered as part of new development and promoting Fibre to the Premises (FTTP) to smaller sites
 - f) Agreement 25 has been amended to highlight the shared guidance produced with Mobile UK outlining that the Norfolk authorities will continue to engage with the telecoms industry on their 5G rollout plans
 - g) Agreement 27 has been added which has allowed the Marine Management Organisation (MMO) to be a signatory to the document and to support ongoing collaboration between the MMO and the Norfolk authorities
 - h) Agreement 28 has been updated outlining that the Norfolk authorities will work together to deliver and administer The Norfolk Green Infrastructure Recreational Avoidance and Mitigation Strategy.
10. The revised NSPF also outlines some amended next steps:
- a) Investigation of the production of a Norfolk Design Guide/Charter
 - b) Developing an implementation programme for the GI RAMS tariff
 - c) Review of the Norfolk HELAA methodology
 - d) Review of the Health Protocol

- e) Review of evidence to support future production of Local Plans
- f) Possible future revision of the NSPF dependent on the outcomes of the Government's proposed planning reforms.

Conclusion

11. The NSPF has been revised and updated to take account of changing circumstances and updated evidence. Continued work on the NSPF demonstrates the Norfolk authorities' commitment to continue to work collaboratively and strategically in discharging the Duty to Co-operate.

Appendix A

Norfolk Strategic Planning Framework

Shared Spatial Objectives for a Growing County and Statement of Common Ground

January 2021



Borough Council of
King's Lynn &
West Norfolk



NORWICH
City Council



Signatories

- Breckland District Council
- Broadland District Council
- Broads Authority
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Natural England
- Environment Agency
- Anglian Water
- Marine Management Organisation
- New Anglia Local Enterprise Partnership
- Active Norfolk
- Water Resources East

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- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- Norfolk County Council
- Suffolk County Council
- Babergh & Mid Suffolk District Councils
- East Suffolk Council
- West Suffolk Council
- Fenland District Council
- East Cambridgeshire District Council
- South Holland District Council
- Natural England
- Environment Agency
- Wild Anglia
- Anglian Water
- New Anglia Local Enterprise Partnership
- UK Power Networks
- Cambridgeshire and Peterborough Combined Authority
- Norfolk and Waveney CCG
- NHS Sustainability and Transformation Partnership Estates for Norfolk and Waveney
- Mobile UK

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Summary of Formal Agreements within the Statement of Common Ground

Please Note: 'Norfolk Planning authorities' and 'Norfolk Authorities' refers to the 7 district authorities that make up Norfolk (see section 1.4), the Broads Authority and Norfolk County Council.

Agreement 1 - That when preparing new Local Plans which seek to identify levels of Objectively Assessed Need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.

Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.

Agreement 3 - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

- To realise the economic potential of Norfolk and its people*
- To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change*
- To address housing needs in Norfolk*
- To improve the quality of life and health for all the population of Norfolk*
- To improve and conserve Norfolk's rich and biodiverse environment*

*Full details of each objective are in section 2 of this document

Agreement 4 –To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

Agreement 5 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

Agreement 6 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.

Agreement 7 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

Agreement 8 – Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan

Agreement 9 - The list of locations in section 5 are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses.

Agreement 10 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.

Agreement 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.

Agreement 13 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

Agreement 15 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

Agreement 16 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

Agreement 17 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:

- **Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.**
- **Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.**

Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.

Agreement 19 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to give consideration to the approaches in the NSPF Climate Change research Paper of this report when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Agreement 20 - Norfolk Planning Authorities agree to work together to investigate the production of a county wide climate change best practice guide/design guide and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles.

Agreement 21– Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high-speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

Agreement 26: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues:

- Infrastructure
- Governance
- Heritage
- Marine Protected areas
- Marine and coastal employment
- Sustainable port development
- Energy – offshore wind and oil and gas
- Access for tourism and recreation
- Sustainable and aquaculture fisheries in small harbour towns
- AONB and Seascape and landscape (character and natural beauty)
- Biodiversity
- Marine aggregates
- Cabling
- Water quality/water supply and sewerage
- Climate change/ Coastal erosion and coastal change management

Agreement 28: In recognition of:

a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;

b) the pressure that development in Norfolk could place on these assets; and

c) the importance of ecological connections between habitats

Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

Agreement 29 :

It is agreed that:

- 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand.**
- 2) A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand.**
- 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development.**
- 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy.**
- 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period.**
- 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns. Priority for the location of new waste management facilities will be given to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.**
- 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.**

Agreement 30: In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

Agreement 31: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.

Section 1 – Introduction

1.1 Purpose of this Document

Norfolk's Local Planning Authorities (including Norfolk County Council) have a long track record of working together to achieve shared objectives. In early 2015 they, working through its strategic planning member forum, agreed to formally cooperate on a range of strategic cross-boundary planning issues through the preparation of the Norfolk Strategic Planning Framework (NSPF).

The aim of producing the framework was to:

- Agree shared objectives and strategic priorities to improve outcomes for Norfolk and inform the preparation of future Local Plans;
- Demonstrate compliance with the duty to co-operate and consistency with the revised National Planning Policy Framework;
- Find efficiencies in the planning system through working towards the establishment of a shared evidence base;
- Influence subsequent high level plans (such as the New Anglia LEP's Economic Strategy, Local Industrial Strategy¹ and Covid 19 Economic Recovery Restart Plan²); and
- Maximise the opportunities to secure external funding to deliver against agreed objectives.

The previous version of the NSPF was endorsed by all Norfolk planning authorities in October 2019 it considered the impact of the revised National Planning Policy Framework (NPPF)³ and the requirement to apply a new standardised methodology to assessing housing need, and produce statements of common ground. It is clear that Norfolk's local planning authorities needed to continue to work closely together to address strategic planning matters and therefore the Norfolk Strategic Planning Member forum agreed to continue to formally cooperate on strategic planning activities and to update the NSPF.

This document continues to fulfil the requirement for Norfolk Local Planning Authorities to produce a statement of common ground setting out the effective and on-going joint working across the county on strategic planning matters. It addresses key cross-boundary issues and progress in cooperating to address these.

A number of working groups have been tasked with updating the document. These groups consist of Local Authority staff assisted by other organisations including the Environment Agency, Natural England NHS Sustainability and Transformation Partnership (STP), Anglian Water, UK Power Networks, Active Norfolk and the New Anglia Local Enterprise Partnership. Our thanks is extended to all those who have contributed to this work which has informed this framework.

¹ [New Anglia LEP Local Industrial Strategy - https://newanglia.co.uk/local-industrial-strategy/](https://newanglia.co.uk/local-industrial-strategy/)

² See [New Anglia LEP Covid 19 Economic Recovery Restart Plan - https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf](https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf)

³ See [National Planning Policy Framework - https://www.gov.uk/government/publications/national-planning-policy-framework--2](https://www.gov.uk/government/publications/national-planning-policy-framework--2)

For further information on the work of the Norfolk Strategic Planning Member Forum and about the process for updating this framework please see the Forum's website:

[Norfolk Strategic Planning Member Forum - www.norfolk.gov.uk/nsf](http://www.norfolk.gov.uk/nsf)

This document is intended to be strategic in nature. It provides only an overview of background information and shared research. A wealth of information has been produced by the working groups; however a decision has been made to keep this document concise and to concentrate on the matters where there is a clear need for agreement between the Local Authorities. We acknowledge that not all factors have been considered, but where appropriate, relevant additional information has been highlighted. The absence of certain issues does not diminish their importance or value.

Details of the lead contact in each local Council on strategic planning matters are included in Appendix 1.

1.2 Governance Arrangements for the creation of this document

Norfolk Strategic Planning Member Forum

The development of this Framework is overseen by the Norfolk Strategic Planning Member Forum. This consists of one Member from each of the Borough Council of King's Lynn and West Norfolk, Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, North Norfolk District Council, Norwich City Council, South Norfolk Council and the Norfolk County Council. The membership of the group will be determined by each authority via annual nomination preferably of the Planning Portfolio Member or equivalent for each authority. The operation of the Member Forum and officer support group is governed by formal terms of reference available from [the Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf](http://www.norfolk.gov.uk/nsf). Chairmanship is determined by the Forum and reviewed each year. The meetings of the Forum are held every three months and held in public. An agenda and papers are circulated in advance of each meeting and informal action notes will be taken and published on the Norfolk Strategic Planning Framework website. Each authority endorses this document through their relevant committees or cabinets.

Norfolk Strategic Planning Officers Group

The Norfolk Strategic Planning Officers Group consists of key planning policy officers from each Planning Authority in Norfolk as well as other key statutory agencies. The group reviews the progress of the document production on a monthly basis. The group have ensured that the document progresses to the timetable and meets any government and legislative requirements.

The Steering Groups

The steering group is responsible for the creation of the document, receiving reports from the Technical Sub groups to help in the authoring process.

Technical Sub groups

The Technical Sub Groups provide technical evidence and make recommendations in relation to the document to the Steering Group. They consist of officers from the Authorities involved in the production of the document and a range of bodies who have expertise and interest in matters related to the group's subject.

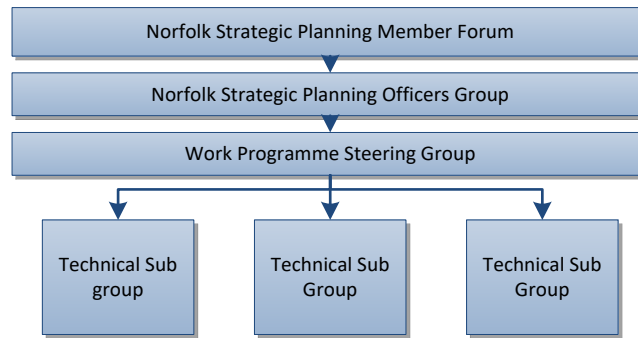


Figure 1: Governance arrangements for the Norfolk Strategic Planning Framework

1.3 Changes to the document

In updating this document Norfolk's local planning authorities sought to ensure the NSPF is up to date with all relevant information and legislation. The document has been updated after the completion of a number of county wide studies looking at:

- Green infrastructure and Recreational avoidance and mitigation and the introduction of a county wide tariff to mitigate against the impact on existing Natura 2000 sites
- The housing needs of the elderly and the types of accommodation required
- Actions that local planning authorities can take to help mitigate and adapt to climate change
- A new health section to highlight the importance of health provision and health living as a strategic cross boundary issue
- Shared Guidance on the roll out of 5G and to help improve fibre broadband connectivity
- Updates to remaining sections to take account of new or updated information

Whilst this document was being prepared the government announced a consultation on landmark reforms to the planning system under the Planning for the Future White Paper⁴. The key aims of the changes are to speed up and modernise the planning system and get the country building. One of the proposed changes will be to abolish the Duty to Cooperate. However the government is giving further consideration to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared. Once further clarification is provided by central government through new legislation and a revised National Planning Policy Framework it will become clear if Norfolk Planning Authorities can continue to address strategic planning matters through a revision of this document. In the meantime partner authorities remain committed to cooperative processes and updating this document.

⁴ See [Planning for the Future White Paper - https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system](https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system)

1.4 Timescale for and coverage of the Document

This document relates to the whole of Norfolk and all Norfolk authorities which include:

Breckland District Council, Broadland District Council, Broads Authority, Great Yarmouth Borough Council, Borough Council of King's Lynn and West Norfolk, Norwich City Council, North Norfolk District Council, South Norfolk Council and Norfolk County Council.

This Statement of Common Ground has been prepared with the understanding that the signatories undertake their statutory duties in accordance with relevant legislation, policy and guidance; and in the context of other relevant Statements of Common Ground, Memoranda of Understanding and Position Statements which they are party to.

All Norfolk Local Planning Authorities have agreed to plan to at least 2036 in their next generation of local plans. This is reflected in the evidence base for this framework insofar as it seeks to provide statistical information looking ahead to this period. This is also the date by when objectives are to be achieved. However, in parts, notably the vision, it is necessary for the document to take a longer term view.

Agreement 1 - That when preparing new Local Plans which seek to identify levels of Objectively Assessed Need for housing the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036.

Section 2 – Vision and Objectives

2.1 Introduction

Norfolk is a diverse County. It covers a land area of 5,370 sq. km (2,074 sq. miles) and has a population of 907,760⁵. It is a largely rural county with a relatively low population density, although over half of the population lives in the built up areas of Norwich, Great Yarmouth and King's Lynn and a number of market towns⁶. These built up areas have a very considerable stock of historic assets and can offer a very attractive quality of life to residents.

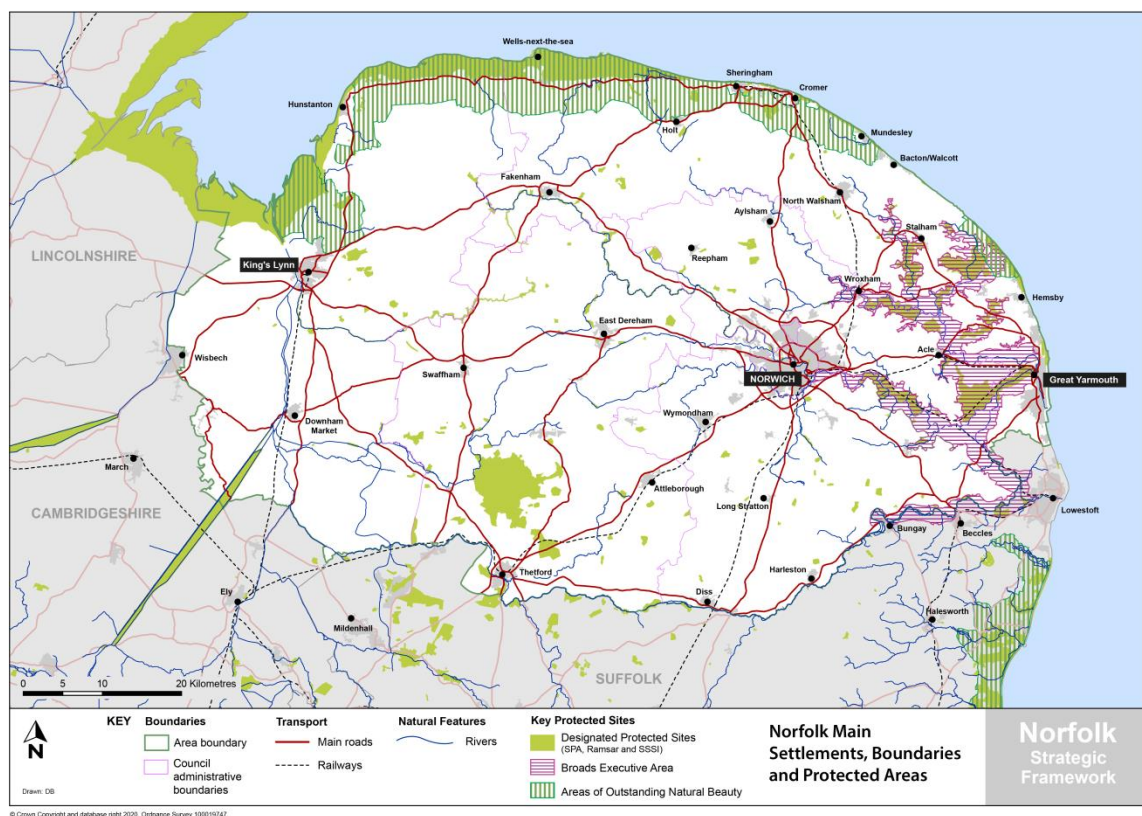


Figure 2: Map of Norfolk's main settlement, Authority boundaries, major transport connections and land-based protected areas. 2021

Norfolk borders Suffolk to the south, Cambridgeshire to the southwest, and Lincolnshire to the west, and has a long coastal boundary stretching from The Wash to the south of Great Yarmouth, this area is covered by the East Inshore Marine Plan⁷. It contains many environments which are highly valued for their landscape and seascape, and for their biodiversity and/or geodiversity interests. In

⁵ Mid year 2019 ONS estimate see [Norfolk Insight web page - http://www.norfolkinsight.org.uk/population](http://www.norfolkinsight.org.uk/population)

⁶ The 21 largest others centres are Attleborough, Aylsham, Cromer, Dereham, Diss, Downham Market, Fakenham, Harleston, Holt, Hunstanton, Loddon, Long Stratton, North Walsham, Sheringham, Stalham, Swaffham, Thetford, Wroxham/Hoveton, Wymondham, Watton, Wells-Next-The-Sea

⁷ See [East Inshore Marine Plan - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/312496/east-plan.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/312496/east-plan.pdf)

particular, the Norfolk Coast Area of Outstanding Natural Beauty, the Brecks and the Broads, which is a unique network of protected rivers and lakes that extends partly into Suffolk and has the equivalent status to a National Park.

Norfolk's economy is also diverse. It is home to a number of world class industries such as on the Norwich Research Park and the offshore energy sector in Great Yarmouth. Employment levels are growing; there is a highly skilled and versatile population with good graduate retention rates and improving links to the thriving markets of Cambridge, London and the wider South East. However, it is not without challenges; gross value added per job in the area remains below the UK average⁸, there are high levels of deprivation especially in urban areas and skill levels in the workforce are relatively low. The Economic Strategy (which was produced by the New Anglia Local Enterprise Partnership in 2017) identifies a number of interventions designed to significantly uplift economic performance in Norfolk.

Norfolk's infrastructure is under developed compared to many other parts of the wider South and East of England. For many years Norwich was the largest city in England not connected to the motorway network by a dual carriageway. Cross county trips tended to be slow and unreliable and rail journey times from London were comparable to places in the north of England such as York and Warrington. However, the dualling of the A11 and the completion of the Broadland Northway (previously known as the Northern Distributor Road) improved travel time and connectivity considerably, and announcements on both the A47 and the Greater Anglia rail franchise have the potential to improve this further. Norwich Airport, the busiest airport in East Anglia, offers regular flights to various destinations in the UK and Europe. Many of the key road and rail links connecting Norfolk to the rest of the UK are still in need of improvement as are many of the links within the County. The need to enhance capacity of infrastructure networks can add considerable costs and increase delays to development.

Patchy mobile coverage is a continuing frustration to residents and businesses⁹. However, the picture regarding superfast broadband coverage is rapidly improving; currently 95% of the county's homes and businesses are able to access speeds of 24Mbps+¹⁰, up from 42% in 2012¹¹.

Through working together and with government, businesses and residents Norfolk's Local Authorities hope to successfully address the challenges faced and maximise the potential of the County. As a basis for guiding this shared endeavour, the following shared vision and objectives have been agreed by the Strategic Planning Member Forum. For further information on the background to this material please see the papers previously considered by the Member Forum¹².

⁸ See [NEW Anglia LEP Economic Strategy page 7 - https://newanglia.co.uk/wp-content/uploads/2020/03/New-Anglia-LEP-Economic-Strategy-Annual-Progress-Report-FINAL-WEB-version-medium-res.pdf](https://newanglia.co.uk/wp-content/uploads/2020/03/New-Anglia-LEP-Economic-Strategy-Annual-Progress-Report-FINAL-WEB-version-medium-res.pdf)

⁹ See [County Council Mobile Map page - www.norfolk.gov.uk/mobilemap](http://www.norfolk.gov.uk/mobilemap)

¹⁰ See Better Broadband for Norfolk Website

¹¹ See Better Broadband for Norfolk Information Sheet 26 (26 May 2017)

¹² See [papers for the 13th October 2016 Member Forum at www.norfolk.gov.uk/nsf](http://www.norfolk.gov.uk/nsf)

2.2 Proposed Spatial Vision

Agreement 2 - In preparing their Local Plans the Norfolk Planning Authorities will seek to positively contribute towards the delivery of the following vision.

“By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural, built and historic environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life and Health for residents. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel.”

2.3 Proposed Shared Objectives

Agreement 3 - By 2036, through co-operation between the Norfolk Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of the following objectives (in no particular order):

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership Economic Strategy, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements and across county boundaries to strengthen inward investment;
- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure;
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities;
- recognising the role of our city centre and the need to re-examine and revitalise the role of town centres as a focus for investment and enhancing the quality of life for residents;
- recognising that the long term conservation, investment in and enhancement of Norfolk's natural environment and heritage is a key element of the county's competitiveness and contributor to the Norfolk economy;
- ensuring a healthy workforce through well planned sustainable communities where people can walk and cycle to work or use public transport or work effectively from home;
- recognise that housing underpins economic growth;
- Maximising the opportunity a clean/green economic recovery presents for the region and the new jobs which will be required to achieve the Governments net zero target

To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact from, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- reducing unnecessary car use and supporting the roll out of new technologies (such as Electric Vehicles and alternative fuels eg hydrogen) and alternative methods of transport including public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

Together these measures will help create healthier more sustainable communities.

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes in line with the Economic Strategy of the New Anglia LEP, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

To improve the quality of life and health for all the population of Norfolk by:

- promoting development and design which seeks to actively improve health, prevent ill health and tackle widespread health inequalities
- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at local level.

To improve and conserve Norfolk's rich and biodiverse environment by:

- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;
- protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- minimising, where possible, development on the best and most versatile agricultural land;
- where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- protecting, maintaining and enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources;
- Protecting and enhancing water, air, soil and other natural resource quality where possible; and
- Leaving the environment in a better state for future generations.

Section 3 – Understanding the County

3.1 Administrative Boundaries

Within Norfolk there are seven separate District Council areas¹³ (as shown in Fig.2), each of which is a Local Planning authority. Overlying parts of five of these areas (and also part of East Suffolk District in Suffolk) is the Broads Authority which is the Local Planning Authority for its area rather than the District Councils. The Broads Authority Executive Area (in which the Broads Authority are the planning authority) overlays these administrative areas and is illustrated in the figure below.

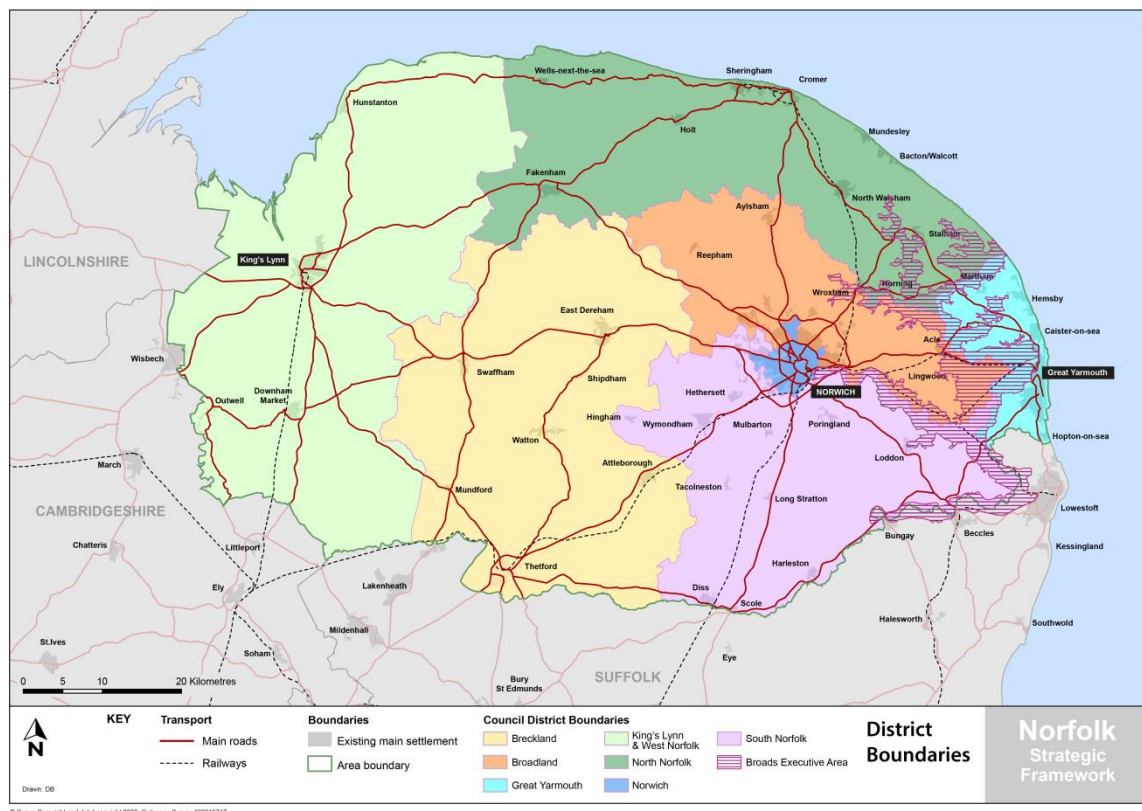


Figure 3: Map of Norfolk District boundaries and the major transport connections. 2021

In addition to the eight Local Planning Authorities the County Council are also a Local Planning Authority responsible for minerals and waste planning as well as certain operational development related to their functions (most notably for educational development).

The 25 Year Environment Plan requires that marine plans are adopted by 2021. The Marine and Coastal Access Act 2009 provides the domestic legislative basis for the marine planning system. The Marine Policy Statement was adopted by all UK Administrations in March 2011, which provides the policy framework for the preparation of all UK marine plans. It contains a range of policy objectives and considerations, which were used to inform decision-making in the absence of a marine plan.

¹³ Breckland District Council, Broadland District Council, Great Yarmouth Borough Council, King's Lynn and West Norfolk Borough Council, North Norfolk District Council, Norwich City Council and South Norfolk Council.

Marine plans translate the Marine Policy Statement into detailed policy and spatial guidance for each marine plan area. Section 58 of the Marine and Coastal Access Act 2009 states that all public bodies making authorisation and enforcement decisions which affect or might affect the UK marine area, must do so in accordance with the adopted marine plan. All other decisions must be made with regard to the Marine Plan, for example, when a public or local authority creates or reviews a local plan.

Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority for England), the Marine Management Organisation (MMO) is responsible for preparing marine plans for English inshore and offshore waters. The East Marine Plans will inform and guide decision-makers on developments which may have an impact on the marine and coastal environment. As the marine planning authority for England, the Marine Management Organisation (MMO) is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, the East Inshore Marine Plan applies up to the mean high water springs mark, which includes the tidal extent of any rivers. The East Marine Plan will therefore overlap with terrestrial plans which generally extend to the mean low water springs mark. On 2 April 2014 the East Inshore and Offshore Marine Plans were published, becoming a material consideration for public authorities with decision making functions.

Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development.

The economic geography of Norfolk is complex as it reflects a multicentric area and boundaries tend to be fuzzy. Overall the County has a relatively high level of self-containment as the vast majority of the resident workforce stay in Norfolk for work, although there are some strong functional cross county boundary linkages¹⁴.

Within the County the three larger urban areas of Norwich, King's Lynn and Great Yarmouth have a considerable influence providing jobs, retail, health care and a broad range of services and facilities as well as homes for a significant proportion of the county's population. These three centres are located in the east, west and centre of the County and have relatively limited functional connection with one another, notwithstanding the A47 linking all three.

3.2 Housing Markets

Housing Market Areas (HMAs) are defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. In defining them, regard is given particularly to: house prices and rates of change in house prices; household migration and search patterns; and contextual data (for example travel to work area boundaries, retail and school catchment areas). They tend to represent *"...the geographical area in*

¹⁴ The linkages between Great Yarmouth and Lowestoft; the settlements in the Waveney Valley; and between King's Lynn and the Fens and Cambridge being particularly important.

which a substantial majority of the employed population both live and work and where those moving house without changing employment choose to stay”¹⁵. All areas need to be identified as being within a housing market although housing market areas can overlap. Norfolk HMAs can be seen in Figure 4.

Prior to the introduction of a new housing methodology in the revised National Planning Policy Framework in July 2018, the Norfolk Districts and the Broads Authority had produced Strategic Housing Market Assessments (SHMAs) which covered the entire County¹⁶. Within the Central Norfolk SHMA area (comprising of Broadland District Council, Norwich City Council and South Norfolk Council) a case can also be made for the identification of a core area based around Norwich and its immediate environs including parts of both South Norfolk and Broadland District Councils. Outputs from the Central Norfolk SHMA include separate conclusions in relation to this core area.

The boundaries of Housing Market Areas will rarely correspond with the administrative boundaries of Local Authorities (Fig.3). In Norfolk there are three distinct HMAs centred on Norwich, King’s Lynn, Yarmouth and their surrounding hinterlands. However there are some areas of the County which are distant from any of these centres; functional links are less apparent, and the case for inclusion within one HMA rather than another is less compelling. To ensure comprehensive coverage the Norfolk Authorities have agreed that the boundaries of the Housing Market Areas should be co-terminus and because housing targets will be set for each Planning Authority area the boundaries of HMAs should be ‘snapped to’ Authority boundaries.

¹⁵ Local Housing Systems Analysis: Best Practice Guide. Edinburgh: Scottish Homes

¹⁶ See [Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)
[KLWN SHMA - https://www.west-norfolk.gov.uk/download/downloads/id/1736/shma_document.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/1736/shma_document.pdf)
[Great Yarmouth SHMA - https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241](https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=1241)

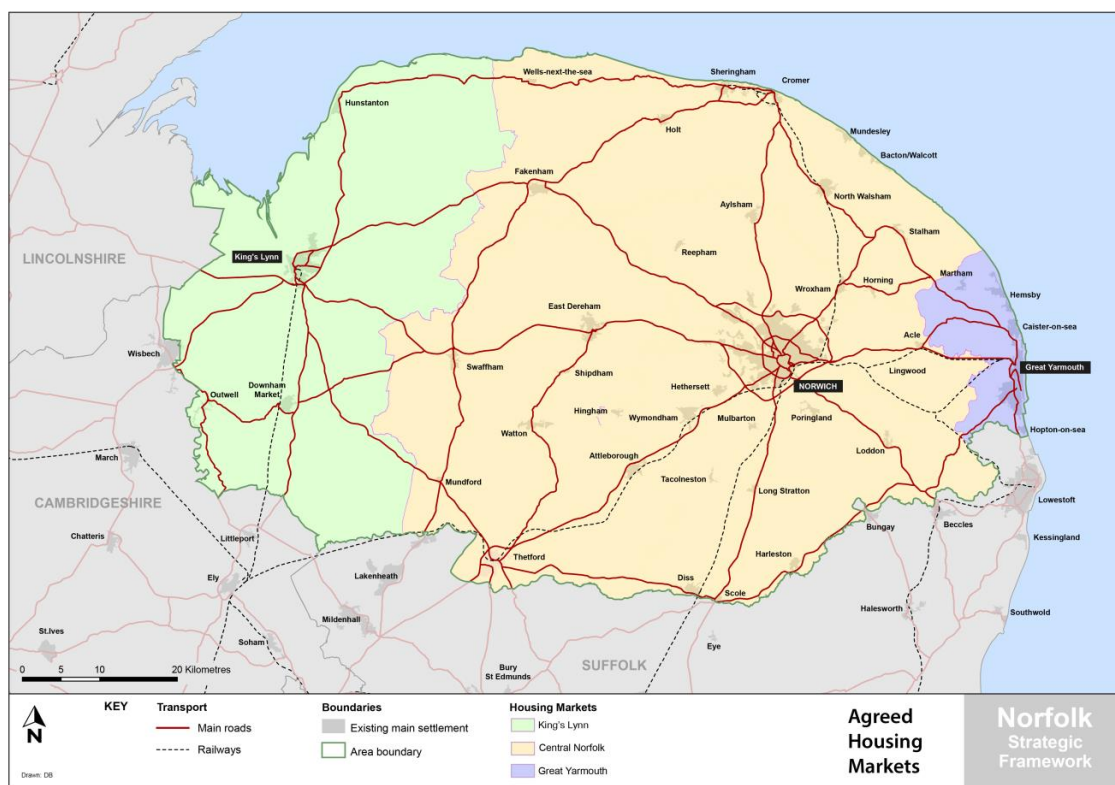


Figure 4: Map of Norfolk Agreed Housing Market Areas. 2021

Agreement 4 –To produce and maintain an assessment of housing needs covering the three contiguous and non-overlapping broad market areas of Great Yarmouth, Central Norfolk and West Norfolk

The housing needs of the relevant parts of the Broads Authority Area are included within the SHMAs for Central Norfolk, Great Yarmouth and East Suffolk. The level of need within the Broads Authority area is specified within the Central Norfolk SHMA¹⁷. The new Government methodology cannot be used to calculate the housing requirements within the Broads area, therefore there remains a requirement for the Broads Authority to calculate a separate housing need when it reviews its local plan.

By virtue of the methodological requirements of the definition HMAs, the Central Norfolk Housing Market is very large and includes settlements some considerable distance apart which have little or no functional connection. In response to this the Central Norfolk Strategic Housing Market Assessment¹⁸ defines a core housing market area identifying the settlements with the strongest

¹⁷ See [pages 132-134 of the Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)

¹⁸ See [pages 35-36 of the Central Norfolk SHMA - https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf](https://www.norwich.gov.uk/download/downloads/id/3993/shma_-_june_2017.pdf)

connections to the Norwich Urban Area. This supports the decision to prepare separate Local Plans for North Norfolk and Breckland District Councils (see below).

Following the introduction of a New Housing Methodology in the Revised National Planning Policy Framework in July 2018, it is clear that government still expects local planning authorities to plan for the right mix of home types and tenures to reflect local needs and the evidence base for such planning is only currently available from the SHMAs and is not available from the new proposed standard methodology.

To help understand for the right mix of home types and tenures King's Lynn and West Norfolk have commissioned a Housing Needs Assessment in 2020¹⁹, North Norfolk has commissioned a SHMA update in 2019²⁰ and the districts in the rest of the county plan to complete similar exercise in the near future.

3.3 Strategic Functional Economic Market Areas

Government guidance recognises that since patterns of economic activity vary from place to place, there is no standard approach to defining a functional economic market area. However in recognising these areas it is possible to define them by taking account of factors including:

- extent of any Local Enterprise Partnership within the area;
- travel to work areas;
- housing market area;
- flow of goods, services and information within the local economy;
- service market for consumers;
- administrative area;
- catchment areas of facilities providing cultural and social well-being; and
- transport networks.

Boundaries of Travel to Work Areas (TTWAs) are illustrated over the page in Figure 5. Information on retail matters are captured within the existing evidence base supporting Local Plans²¹. Both these sources suggest that whilst Norwich is a major Regional Centre and draws trade from an extensive catchment across Norfolk and the wider region, both King's Lynn and Great Yarmouth retain a sufficient degree of self-containment to be considered in different functional economic market areas for most purposes.

It should also be noted that there are some very strong and significant cross boundary functional economic relationships. Great Yarmouth has particularly strong links with Lowestoft to the South. Within the Waveney Valley there are strong relationships between settlements on both sides of the County boundary. In the West of the County, King's Lynn in particular has functional economic

¹⁹ See [West Norfolk Housing Needs Assessment - https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/6252/2020_housing_needs_assessment.pdf)

²⁰ See [North Norfolk Housing Needs Assessment - https://www.north-norfolk.gov.uk/media/5528/shma-local-housing-needs-assessment-2019.pdf](https://www.north-norfolk.gov.uk/media/5528/shma-local-housing-needs-assessment-2019.pdf)

²¹ See [in particular the Employment, Town Centre and Retail Study for the greater Norwich Local Plan - https://gnlp.oc2.uk/document/14/4552#d4552](https://gnlp.oc2.uk/document/14/4552#d4552)

linkages to the Lincolnshire and Cambridgeshire Fens. Settlements such as King's Lynn, Downham Market and Thetford also benefit to some extent by good access to the Cambridge economy.

The position within the Central Norfolk area is again more complicated as for certain economic functions (such as higher order retail and cultural activities) the catchment area extends over the whole of Central Norfolk areas; there are far weaker connections in other areas of economic activity. In outer parts of the Central Norfolk area there is little functional connection for convenience shopping and the proportion of working residents who work in the Norwich urban area is very low²². Both Thetford and Mildenhall and Cromer and Sheringham are still regarded as being distinct Travel to Work Areas. These are illustrated below.

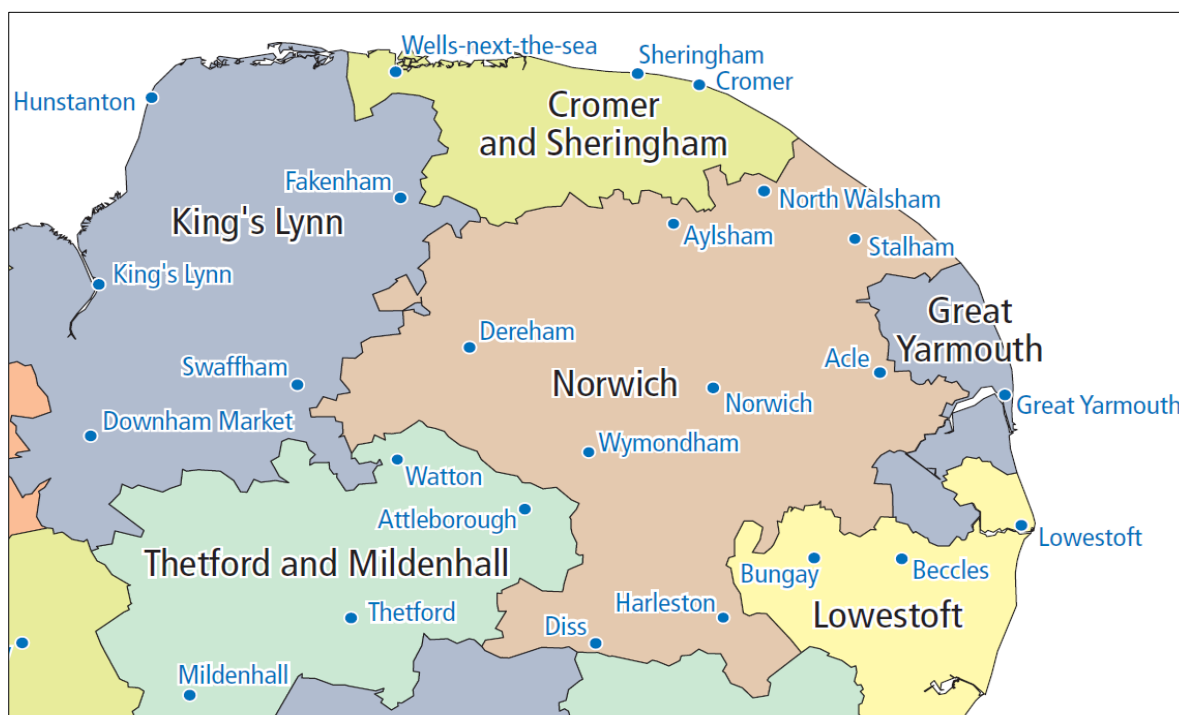


Figure 5: Norfolk's 2011 travel to work areas (TTWAs). Source: ONS 2015

The information available, including particularly the TTWAs and the higher retail analysis, suggests that the boundaries of strategic functional market areas are likely to be similar to the Housing Market Areas described above albeit, for many purposes significant sub-areas within these strategic areas will exist for a number of economic functions, especially within the Central Norfolk area.

²² The Central Norfolk SHMA identified the following settlements within the area of the 5 Central Norfolk Districts as having less than 10% of their resident workforce working in Norwich: Diss, Harleston, Sheringham, Swaffham, Thetford, Watton and Wells.

3.4 Implications of Changing Infrastructure on Market Areas

Norfolk has benefitted from a number of significant improvements to its transport infrastructure. It is arguable that these, and others expected to be built over the next few years will have some effect on the functionality of the housing and economic markets. For example the dualling of the A11 (Fiveways to Thetford) was completed and opened in December 2014, significantly improving the road connectivity between much of the County, Cambridge, the wider South East and the Midlands. The A47/A143 link road, which opened in December 2015, now better connects Great Yarmouth's Enterprise Zone at Beacon Park to further growth areas. The Broadland Northway which completed in Spring 2018 is a key part of the Norwich Area Transportation Strategy which also includes considerable investment in a range of other improvements across Norwich²³. The A17 is an important part of the road network, serving longer-distance trips, and has been included as part of the Major Road Network, a category of the road network comprising the country's busiest and most economically important A class roads in local-authority control.

The Highways (England) Roads Investment Strategy contains a number of improvement schemes for the A47 as part of the government's trunk road programme to be delivered by 2025:

- A47 Vauxhall and Gapton Roundabouts, Great Yarmouth
- A47 Blofield to Burlingham Dualling
- A47 Easton to Tuddenham Dualling
- A47/A11 Thickthorn junction

Additionally further improvement to the strategic road network of the County will be delivered by the Long Stratton bypass which is expected to be underway by 2022.

In summer 2016 the Department for Transport confirmed Abellio as the operator of the new East Anglian rail franchise, which commenced in October 2016. The nine year franchise will deliver a variety of improvements (some of which have already been delivered) including the following that are of particular significance for Norfolk:

- Replacement of the entire fleet of trains ;
- More services and faster journeys across the network, including two 'Norwich in 90' trains each way per day;
- Norwich to Cambridge services extended to Stansted Airport every hour;
- Faster services between Cambridge and London;
- Work with Network Rail to implement specific schemes to drive up performance and reliability throughout the franchise;
- Increase in seats into London in the morning peak period, and an increase of more than 1,000 services per week on the franchise network; and
- Various other improvements including improvements to WiFi, stations and ticketing systems.

A priority is the improvement of the Cambridge Norwich services including half hourly frequency.

²³ See [Norwich Area Transportation Strategy - www.greaternorwichgrowth.org.uk/dmsdocument/554](http://www.greaternorwichgrowth.org.uk/dmsdocument/554) for further information

Whilst the recently delivered and announced infrastructure enhancements are welcomed and cumulatively will assist the County in reaching its economic potential it is not considered likely they will result in any significant change to the functional geography of the County in the immediate future with regard to either housing or economic markets. East/West communications across the County will remain relatively slow and lack reliability, therefore it is likely that both King's Lynn and Great Yarmouth will retain similar levels of self-containment in housing and economic matters as present. The functional geography of the County will remain broadly as it is at least for the period of the preparation of the next round of Local Plans.

In the revised NPPF the government introduced the requirement to produce a Statement of Common Ground (SCG) over the housing market area or other agreed geographical area where justified and appropriate.

In light of this requirement and the above analysis of our functional economic geography it is the view of the Norfolk Local Planning Authorities that there is a strong case to produce a single statement of common ground across Norfolk rather than seeking to produce three separate ones based on one large and two small Housing Market Areas. The reasons for this are:

- The recognised desire of the government not to disrupt existing joint working arrangements where these are effective;
- The high overall rate of self-containment of the Norfolk economy;
- The somewhat weak functional relationship between the outer areas of the Central Norfolk Housing Market Area and its core and the similarity of the strategic issues faced by these outer areas with the adjoining coastal and rural areas of Kings Lynn and West Norfolk and Great Yarmouth Boroughs; and
- The way in which the Broads Authority area overlaps both the Great Yarmouth and Central Norwich Housing Market Areas and five of the District planning authority areas which are signatories to this Framework.

Furthermore the shared understanding of economic geography has led to a number of agreements being reached about appropriate Local Planning areas for Norfolk.

The relative self-containment of both King's Lynn and Great Yarmouth suggests that in practical terms there may be problems in seeking to meet growth pressures evident in King's Lynn and Great Yarmouth within the central Norfolk area and vice versa. In the light of this the following agreement has been reached.

Agreement 5 - That Great Yarmouth and King's Lynn and West Norfolk will each continue to prepare separate Local Plans for their areas.

With regard to Central Norfolk, the evidence does suggest that there may be some possibility for some of the growth pressures evident within the five Districts of Central Norfolk to be met within the different administrative areas of Central Norfolk. These five District authorities (Breckland, Broadland, North Norfolk, Norwich City and South Norfolk, along with the Broads Authority that partly overlaps 4 of their administrative areas) already co-operate closely, have a shared SHMA and are working on other joint studies. However, as noted above the Central Norfolk Housing Market Area is broad and contains places that have little relationship within one another and only a comparatively weak relationship with Norwich at the centre of the area. In the light of this the Local Authorities have reached agreement that whilst it will be necessary to closely co-operate on strategic planning matters and shared evidence it is only appropriate to seek to plan jointly over the area closer to Norwich with much stronger functional connectivity. The possible advantages of

producing a single Local Plan covering all of Central Norfolk are considered to be outweighed by the delays this would cause to plan preparation and the difficulty of getting meaningful engagement over such a large area.

Agreement 6 - That Breckland and North Norfolk will continue to prepare separate Local Plans for their areas whilst Broadland District Council, Norwich City Council and South Norfolk Council will co-operate on a new Greater Norwich Local Plan that will replace the current Joint Core Strategy and various other existing Local Plan documents in this area.

The issue of whether it is appropriate to define any sub market areas or not will be a matter for those Plans. This approach does not preclude the possible redistribution of growth across the Central Norfolk area should this be supported by evidence and agreed by the relevant planning authorities.

Furthermore, the Broads Authority Area overlaps functional housing and travel to work areas of Central Norfolk, Great Yarmouth and Lowestoft. The area clearly has a unique environment and a very distinct set of planning challenges which suggest that joint Local Planning would not be the best approach.

Agreement 7 - That, in view of the very distinct issues facing the Broads Authority Area, spatial planning matters will continue to be best addressed by way of a standalone Broads Local Plan.

For further information on the current Local Plans in the County and the timetable for review please see the Norfolk Compendium²⁴.

3.5 Other Joint Initiatives and Neighbouring Strategic Partnerships

Given the high degree of self-containment in relation to the housing market and travel to work areas the framework relates principally to the county of Norfolk although where appropriate cross boundary initiatives are in place. For example planners from all of the Norfolk and Suffolk coastal local planning authorities, including the Broads Authority have also held a series of meetings over the latter part of 2017/early 2018 to share knowledge and experience and identify common interests around the coastal planning process. This has led to the creation of a separate 'Coastal' Statement of Common ground being developed²⁵ and work is underway to produce a coastal adaption Supplementary Planning Document. Other joint working arrangements include a Statement of common ground between Great Yarmouth and East Suffolk and the Cambridge Norwich Tech corridor, further details of cross boundary initiatives are in appendix 2.

²⁴ See [Norfolk Compendium of Local Plans on https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use-policies](https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/monitoring-land-use-policies)

²⁵ See [Statement of common ground coastal zone planning report - https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/strategic-member-forum/nspmf-statement-of-common-ground-coastal-zone-planning-report-180712.pdf](https://www.norfolk.gov.uk/-/media/norfolk/downloads/what-we-do-and-how-we-work/policy-performance-and-partnerships/partnerships/strategic-member-forum/nspmf-statement-of-common-ground-coastal-zone-planning-report-180712.pdf)

Norfolk is bounded by Suffolk to the south and Cambridgeshire and Lincolnshire to the West. Strategic partnerships are being developed in these neighbouring areas in response to national objectives for additional homes, jobs and enhanced infrastructure.

Following the formation of the Combined Authority (CA) for Cambridgeshire and Peterborough, the CA produced the Cambridgeshire and Peterborough Strategic Spatial Framework²⁶ in March 2018 which brings together the current growth ambitions of the area, and how the Combined Authority can support local jobs and housing growth ambitions. The Combined Authority are engaging with its partners and other stakeholders to continue to develop the second half of the Strategic Spatial Framework.

In Suffolk, the Suffolk's Inclusive Growth Framework²⁷ has been refreshed and relaunched by the Suffolk Growth Partnership in November 2020. The Framework brings together the shared growth work that is being taken forward across Suffolk into a single, cohesive programme.

The Framework:

- Presents the starting point and ambitions to allow local authorities to engage with communities, partners and Government with a clear and consistent message
- Sets out a single, concise summary of the work being taken forward to plan, coordinate and deliver growth across Suffolk
- Enables connections between programmes of work across the public sector, thereby minimising duplication and ensuring greater benefit is delivered through our investments

To the west of Norfolk the South East Lincolnshire Local Plan²⁸ was adopted in March 2019 by the Joint Strategic Planning Committee. The Committee is a partnership of Boston Borough, South Holland District and Lincolnshire County Councils who are working together to plan the future of South Holland District and Boston Borough.

Across the wider region Norfolk is represented at the East of England Local Government Association and on the East of England Strategic Spatial Planning Officers' Liaison Group (SSPOLG) The role of the latter is to coordinate technical and policy work relevant to councils in the East of England on strategic economic, planning and infrastructure challenges, with a particular focus on engagement with London and the Wider South East.

Norfolk Authorities will continue to work with authorities in the region through their strategic partnerships and national initiatives to ensure a complementary, integrated approach to growth and to optimise investment opportunities to achieve mutually beneficial outcomes.

²⁶ See [Cambridgeshire and Peterborough Strategic Spatial Framework - https://cambridgeshirepeterborough-ca.gov.uk/assets/Combined-Authority/NSSF-Phase-1-final.pdf](https://cambridgeshirepeterborough-ca.gov.uk/assets/Combined-Authority/NSSF-Phase-1-final.pdf)

²⁷ See [Suffolk's Inclusive Growth Framework - https://27ea8bdd-fa24-451b-baf1-35bcfe30437b.filesusr.com/ugd/43f74e_988022cc644f4ac79d4bf0743468fa32.pdf](https://27ea8bdd-fa24-451b-baf1-35bcfe30437b.filesusr.com/ugd/43f74e_988022cc644f4ac79d4bf0743468fa32.pdf)

²⁸ See [South East Lincolnshire Local Plan - http://www.southeastlincslocalplan.org/adopted-plan/](http://www.southeastlincslocalplan.org/adopted-plan/)

Section 4 – Projections of growth

As a baseline for planning activity published projections for the County must be considered, including projections regarding population, households and employment. These are summarised below. However, it should be recognised that these are statistical projections and tend to be very heavily based on the extrapolation of past trends. In forward planning it is essential that other factors are given due weight. This is done in subsequent sections of this document and these projections are only produced for information.

4.1 Population Projections

The most recent set of national population projections were published by the Office for National Statistics (ONS) in March of 2020²⁹. These show an increase in the rate of overall population growth from the 2016 ONS figures, Table 1 shows a growth in population levels of 11% over the 18 year period from 2018-2036. Districts are projected to see a significant variation in levels of population growth of between 4% in King's Lynn and West Norfolk to 23% in South Norfolk.

Table 1: Current and projected population numbers for Norfolk Districts. Source: ONS, 2020

District	2018 (000's)	2036 (000's)	Population growth 2018-2036 (%)
Breckland	139.3	158.6	13
Broadland	129.5	145.8	13
Great Yarmouth	99.4	104.7	5
King's Lynn And West Norfolk	151.8	157.7	4
North Norfolk	104.6	114.9	10
Norwich	141.1	150.3	7
South Norfolk	138	169.2	23
Norfolk	903.7	1001.2	11

It should be noted that these projections do not take into account existing planned growth such as existing commitments in the Greater Norwich Joint Core Strategy. This would suggest a somewhat different distribution of population growth between the Greater Norwich authorities.

The population projections also contain considerable information of the age profile of the population. This is potentially of considerable strategic significance for Norfolk which will have major implications for Local Authority services and will need to be considered in Local Plans. The projected age profiles are set out in the Table 2 and 3 over the page.

²⁹ Available at [ONS population projections - https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2](https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandtable2)

Table 2: Existing population numbers (000s) and % by age quartiles (2018) and projected population numbers and % by age quartiles (2036) of Norfolk Districts. *Source: ONS*

District	2018				2036			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	139.3	29.5 (21.2)	75.3 (54.1)	33.5 (24)	158.6	30.6 (19.3)	78.6 (49.6)	49.4 (31.1)
Broadland	129.5	26.4 (20.4)	69.9 (54)	33.2 (25.6)	145.8	27.8 (19.1)	73.4 (50.3)	44.6 (30.6)
Great Yarmouth	99.4	22 (22)	53.4 (53.7)	24 (24.1)	104.7	20.4 (19.5)	51.9 (49.6)	32.4 (30.9)
King's Lynn And West Norfolk	151.8	32.2 (21.2)	80.4 (53)	39.1 (25.8)	157.7	30.4 (19.3)	76.3 (48.4)	51 (32.3)
North Norfolk	104.6	18.1 (17.3)	52.2 (49.9)	34.3 (32.8)	114.9	17.2 (15)	51.7 (45)	45.9 (39.9)
Norwich	141.1	31.7 (22.5)	88.5 (62.7)	21 (14.9)	150.3	30.8 (20.5)	92.7 (61.7)	26.9 (17.9)
South Norfolk	138	30.6 (22.2)	74.3 (53.8)	33.1 (24)	169.2	35 (20.7)	86.4 (51.1)	47.8 (28.3)
Norfolk	903.7	190.5 (21.1)	494 (54.7)	219.3 (24.3)	1001.2	192.2 (19.2)	4511.1 (51)	298 (29.8)

Table 3: Change in 000s between 2018 and 2036. Difference between 'All People' for each district between 2016 and 2036 in %. *Source: ONS*

District	Difference between 2018 and 2036			
	All people (000s)	000s aged 0-19 (%)	000s aged 20-64 (%)	000s aged 65+ (%)
Breckland	19.3	11.1 (-1.9)	3.3 (-4.5)	14.9 (7.1)
Broadland	16.3	1.4 (-1.3)	3.6 (-3.7)	11.4 (5)
Great Yarmouth	5.4	-1.6 (-0.5)	-1.5 (-4.1)	8.4 (6.8)
King's Lynn And West Norfolk	5.9	-1.8 (-1.9)	-4 (-4.6)	11.8 (6.5)
North Norfolk	10.3	-0.8 (-2.3)	-0.5 (-4.9)	11.6 (7.1)
Norwich	9.2	-0.9 (-2)	4.2 (-1)	5.9 (3)
South Norfolk	31.2	4.4 (-1.5)	12.1 (-2.7)	14.7 (4.3)
Norfolk	97.5	1.7 (-1.9)	17.1 (-3.7)	78.2 (5.5)

These tables show that whilst the overall population of the County is projected to grow steadily at a relatively modest rate, the change in the age profile is more significant with over 80% of the total increase between 2018 and 2036 being accounted for by growth in the over 65s³⁰. Between the ages of 20 and 64 population growth is projected to be slow, with only a 3% growth rate over the 18 year period, whilst the numbers of 0-19 years olds are projected to grow very slowly by just 0.9%.

These numbers do vary somewhat between individual districts (with Norwich being notably less affected by an ageing population) but the growth in the elderly population is projected to affect most parts of the County and will create significant issues given current models for funding social care and education provision. These issues are not considered further in the framework but the issues relating to housing are considered further in the housing section.

The 2019 Health profile for England³¹ suggests:

- Improvements in life expectancy in England are uncertain with provisional data showing that life expectancy at has seen no improvement from 2017 figures.
- The number of years spent in poor health is increasing. This will impact the need for particular housing, transport and service delivery solutions

Deprivation and inequality continue to be key and enduring factors in poor health outcomes and so need addressing. Consequently access to housing and employment and the impact of spatial and economic planning on these factors needs consideration.

³⁰ Total growth in population age 65 plus is 78,200

³¹ <https://publichealthengland.exposure.co/health-profile-for-england-2019>

4.2 Household Projections

The most recent set of household projections were published in June 2020³². For the country these 2018 projections are broadly in line with the 2016 projections, however for Norfolk these show a significant increase in households, by approximately 9000 by 2036, over the 2016 household projections. Similar patterns of growth are shown as for population but it should be noted that these projections do not take into account growth planned in existing Local Plans which may influence the scale and distribution of the growth in households. The new household projections also show greater growth in the more rural districts compared to previous versions of the projections.

Table 4: ONS 2018 household projections. Source: ONS

District	2011	2018	2026	2036	Household growth 2018-2036 (%)
Breckland	54,522	58,612	63,815	69,497	19
Broadland	53,343	55,676	59,997	64,593	16
Great Yarmouth	41,988	43,350	45,460	48,106	11
King's Lynn and West Norfolk	62,928	64,461	66,522	69,539	8
North Norfolk	46,033	48,448	51,374	55,390	14
Norwich	59,587	63,012	64,778	68,088	8
South Norfolk	52,825	60,172	67,140	75,221	25
Norfolk	371,225	391,737	419,086	450,434	15

4.3 Employment Projections

Across the East of England Local Authorities use the East of England Forecasting Model (EEFM) to better understand the development needs of their area. The model provides a set of baseline forecasts designed to facilitate the setting of consistent housing and jobs targets and can also provide a means of generating alternative scenarios. It is prepared by the independent forecasting house Cambridge Economics and further information about the model and details of runs published are available online³³.

Table 5 sets out the headline results for Norfolk Districts produced in the 2017 run of the model. As with any forecast model, these results need to be treated with a degree of caution. They are “policy neutral” and assume that policy context in the future remains broadly as it has in the past. They cannot reflect the impact of any recent or future interventions that may be made through infrastructure investment, Economic Strategies or Local Plans, and the model has yet to be run to take account of the impacts of both the Coronavirus and the UK leaving the European Union. In addition, the reliability of a number of the underlying datasets decreases at smaller scales, and

³² See [ONS household projections - https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections](https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections)

³³ See [East of England Forecast Model website - http://cambridgeshireinsight.org.uk/EEFM](http://cambridgeshireinsight.org.uk/EEFM)

economic activity is not limited by council boundaries, so individual sector and District forecasts should be treated as being broadly indicative.

Overall the model shows that without additional intervention total job levels in the Norfolk economy are projected to grow at relatively modest rates over the next 20 years with most of the growth projected taking place within Greater Norwich. If the aims of the City Deal are added to the model's forecasts, it projects that over 92% of all the net growth in Norfolk will take place in Greater Norwich.

Table 5: Total employment by district. Source: EEFM 2017 and Central Norfolk SHMA

Districts	Total employment (000's)				2016-2036 growth (000's)
	2011	2016	2026	2036	
Breckland	49.8	57.5	58.2	59.8	2.3
Broadland	53.7	58.7	61.1	62.6	3.9
Great Yarmouth	41.9	43.9	45.9	47.6	3.7
King's Lynn & West Norfolk	62.6	68.9	71	72.3	3.4
North Norfolk	39.5	42.4	43.3	44.3	1.9
Norwich	89.5	102	108.4	113.3	11.3
South Norfolk	56.3	63.3	68.9	74.7	11.4
Greater Norwich*	199.4	223.9	250.3**	262.3**	38.4
Norfolk	393.3	436.7	468.7**	486.4**	49.6

*Broadland, Norwich & South Norfolk

**City Deal additional 11,800 jobs added but not broken down between GN Districts

Note: The Broads does not have its own jobs figures but any jobs delivered contribute to district target.

Section 5 – The Economy

Strategic Economic Objectives

To realise the economic potential of Norfolk and its people by:

- facilitating the development and infrastructure needed to support the region's business sectors and clusters, driving economic growth through the enhancement of productivity, skills and education to provide widening opportunities in line with the New Anglia Local Enterprise Partnership Economic Strategy, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge;
- providing for job growth broadly matching increases in housing provision and improving the alignment between the locations of workplaces and homes;
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements and across county boundaries to strengthen inward investment;
- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure;
- strengthening Norfolk's competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities;
- recognising the role of our city centre and the need to re-examine and revitalise the role of town centres as a focus for investment and enhancing the quality of life for residents;
- recognising that the long term conservation, investment in and enhancement of Norfolk's natural environment and heritage is a key element of the county's competitiveness and contributor to the Norfolk economy;
- ensuring a healthy workforce through well planned sustainable communities where people can walk and cycle to work or use public transport or work effectively from home;
- recognise that housing underpins economic growth;
- Maximising the opportunity a clean/green economic recovery presents for the region and the new jobs which will be required to achieve the Governments net zero target

5.1 Strategic Principles of Economic Success

It is clear that Local Authorities will need to continue to work collaboratively with one another, the LEP and businesses in order to deliver the step change in economic performance that is necessary to deliver the shared objectives. Among the measures that are thought likely to be necessary at this stage are:

Supporting future economic growth

- supporting the development of businesses in identified priority sectors, including building on and making links with established and emerging clusters, and the provision of well serviced land and vacant premises;
- facilitating physical regeneration and enhancement projects in areas of deprivation, involving the local community in the process;
- encouraging international trade and supporting increased inward investment
- recognising the contribution of Norfolk's market towns

Education and skills

- supporting the creation, expansion and enhancement of education establishments, including further education, technical institutes and universities to develop the right skills base in the workforce; and
- enhancing the quality of the natural and built environment to ensure that the area remains attractive for its quality of life, and as a location for business.
- supporting the role of apprenticeships for retraining and up skilling the workforce including the expansion of the syllabus offered to meet the needs of locally based businesses
- supporting labour market resilience through initiatives including support for residents with health related problems to get back into work

New Anglia has been chosen as 1 of 2 pilots across the greater south east energy hub area to work with the energy systems catapult to develop the institutional and physical infrastructure to support the rapid deployment of high-quality training programmes needed to deliver cutting edge property decarbonisation schemes. This proposal seeks to address the gaps and shortcomings through a global and whole house skills and training approach that integrates technologies and delivers good outcomes for customers, rather than the piecemeal installation of measures.

Connectivity

- enhancing the provision of infrastructure to enable digital connectivity that will facilitate economic growth.
- supporting employment allocations that minimise travel distance and maximise the use of sustainable transport modes;
- ensuring that investment in strategic transport infrastructure demonstrably supports economic growth, and also ensuring that economic strategies and Local Plans support the case for investment in that infrastructure; The new 'Norfolk & Suffolk Innovation Network' Funding will create a Long-Range Wide Area Network (LoRaWAN), for sending and receiving low power signals from digital sensors across the region. This will enable business, public sector, educational organisations and individuals to explore, trial and implement Internet of Things (IoT) technology.

5.2 Context

The recent growth in Norfolk's economy is driven by certain key sectors, mostly concentrated in specific geographic areas, where there are particular strengths and expertise, for example energy, advanced engineering, tech/digital, food and life sciences. Norfolk's overall employment rates have generally remained above national levels over the past 10 years (currently 77.7%, compared to the national level of 75.6%) and unemployment rates are generally below the national level and lower than they were 10 years ago³⁴.

While this Strategic Framework addresses development matters (broadly speaking, building and changes in the use of land), it is recognised that to be fully effective this needs to be complementary to other programmes and measures at the district, county, regional and national levels. In the light of the factors mentioned above, endeavours to promote 'inclusive growth' are especially relevant such as developing skills, community aspiration and capacity; recognising and nurturing the contributions of voluntary and community sectors; the quality of job opportunities, etc.

Whilst many districts have their own economic development strategies, the importance of working collaboratively across district boundaries is recognised. This Norfolk Strategic Planning Framework provides one of the foundations for cooperation as does the Norfolk and Suffolk Strategic Economic Strategy (NSES), published in 2017.

The Government published its Industrial Strategy White Paper, 'Building a Britain fit for the future' in November 2017⁴. The overarching aim and ambition of the Industrial Strategy is to provide a long term framework to build on our areas of competitive advantage, to close the gap between our best and worst performing areas, and make the UK one of the most competitive places in the world to start or grow a business. The strategy identified 5 foundations of productivity and 4 grand challenges to put the UK at the forefront of the industries of the future.

In response, the New Anglia LEP, in consultation with stakeholders, produced the Norfolk and Suffolk Local Industrial Strategy (LIS) which was submitted to Government in Autumn 2019.

All of the Districts have formally endorsed working to deliver the NSES and there is a good record of collaboration on specific economic development projects. This Framework provides the opportunity to lay the foundation for developing a Norfolk Economic strategy which builds upon both the NSES and Districts own economic development strategies.

The Norfolk and Suffolk LIS and the Economic Strategy are designed to work in tandem and the targets set out in the NSES are still valid. Some of the key targets are summarised in Table 7.

³⁴ ONS Annual Population survey, (July 2017-June 2018)

Table 6: Summary of Key Economic Strategy targets (New Anglia Area)

Economic Strategy Headline	Target (to 2036)
Jobs	88,000 more jobs
Businesses	30,000 new businesses
Housing	140,000 new houses
GVA	£39 per Hour

It is expected that measures to assist in the delivery of these objectives will be brought forward as part of the Implementation of Delivery and Investment Plans.

The Norfolk Local Authorities are committed to strengthened collaboration and focus on new initiatives and interventions to help nurture economic growth in higher value, knowledge based sectors across Norfolk. These include multi-site Enterprise Zones led by the New Anglia LEP, the Cambridge-Norwich Tech Corridor, innovation centres at King's Lynn and Hethel, and energy related Enterprise Zone sites across Great Yarmouth and East Suffolk.

5.2.1 Coronavirus Impacts

The impact of the Covid-19 pandemic has been profound with tens of thousands of lives lost, lockdown restrictions which have affected daily lives, and significant damage to the local and national economy. In response to the pandemic the New Anglia LEP, working with partners, has produced the Covid 19 Economic Recovery Restart Plan.

This restart plan sets out the actions and interventions that are being taken by a wide range of partners, including New Anglia LEP, local authorities, business, industry councils and sector groups, VCSE organisations, colleges and universities. It demonstrates the strong local appetite and energy for getting the local economy going again and helping those who have been hit hardest.

The Restart Plan contains an unprecedented package of measures delivered by partners locally and nationally to get businesses up and trading again, restore business, consumer and community confidence, as well as provide support to individuals made redundant and looking for work.

The Key measures include:

- Responding to redundancies to support individuals being made redundant and help businesses looking for workers.
- Advice and support for businesses - every business has access to the finance and support they need.
- Youth pledge to support young people to get into high quality education, employment, training, or an apprenticeship.
- Transforming skills to ensure everyone has access to opportunities to upskill and reskill
- Mental health and wellbeing programme that provides employers and employees with the mental health and wellbeing support they need.
- Reimagining high streets - support in developing a range of measures to help high street businesses reopen and operate safely.
- Visitor economy – launch a proactive campaign to promote the area as a destination to live and work

- Digitisation – launch a major campaign to support businesses to build their online presence and to improve productivity, including flexible working practices for their employees, through better use of technology.
- Supply chain – work with local companies to capitalise on opportunities to sell more goods and services locally
- Infrastructure – supporting the construction sector through continued investment in key infrastructure and make a compelling case to Government to fund priority infrastructure schemes.
- Norfolk & Suffolk Unlimited – develop a campaign to promote Norfolk and Suffolk as a place rich with investment opportunities.
- Safe and sustainable public transport – work to support and promote safe and sustainable public transport use, to continue to improve air quality and reduce congestion

This Restart Plan is the first of a two-stage economic recovery plan for the area. It will support businesses, individuals, communities, anchor institutions and further and higher education providers to start trading and living life with confidence, in an environment dominated by social distancing and economic uncertainty, as quickly and safely as possible. Both the restart and renew recovery plans will look to capitalise on the county's major strengths and new opportunities in clean energy, agri-food, information and communication technology and digital creative, alongside ensuring the foundation sectors get the support needed.

The second stage to the plan is the Renew Plan, this a longer-term plan for jobs and sustainable growth which will also serve to support the Government national recovery plan. The restart plan is also supported by the Visitor Economy Recovery plan and evidence base³⁵.

AGREEMENT 8 - Norfolk Authorities will work positively to assist the New Anglia Covid 19 Economic Recovery Restart Plan

³⁵See [New Anglia LEP Covid 19 Economic Recovery Restart Plan - https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf](https://newanglia.co.uk/wp-content/uploads/2020/06/New-Anglia-LEP-NSU-Recovery-Plan-2020-FINAL.pdf)

5.2.2 Climate Change

In November 2020 the government set out ambitions for investment in clean energy, transport and energy efficiency, designed to support the country's 2050 net zero emissions target and to support up to 250,000 new jobs. The 10-point plan³⁶ includes commitments on offshore wind, low carbon hydrogen production, electric vehicles and nuclear. Ten Point Plan are:

1. Advancing Offshore Wind
2. Driving the Growth of Low Carbon Hydrogen
3. Delivering New and Advanced Nuclear Power
4. Accelerating the Shift to Zero Emission Vehicles
5. Green Public Transport, Cycling and Walking
6. Jet Zero and Green Ships
7. Greener Buildings
8. Investing in Carbon Capture, Usage and Storage
9. Protecting Our Natural Environment
10. Green Finance and Innovation

The Energy white paper³⁷ expands on the Ten Point Plan and sets out the steps needed to cut emissions from industry, transport and buildings.

In March 2019, the UK Government and offshore wind industry agreed a Sector Deal, securing offshore wind's position at the heart of the future UK energy mix as a large-scale, low-carbon form of electricity.

5.2.3 Norfolk's Key Economic Sectors

There are significant geographic clusters of existing business activity that anchor the Norfolk economy, with a number of these offering significant potential for growth. The Norfolk and Suffolk Economic Strategy identifies nine key sectors:-

- Energy
- Advanced Agriculture, Food & Drink
- Life Sciences and Biotech (including health)
- ICT, Tech and Digital Creative
- Financial Services and Insurance
- Visitor Economy – Tourism and Culture
- Transport, Freight and Logistics
- Construction and Development
- Advanced Manufacturing and Engineering

³⁶ See [The Ten Point Plan for a Green Industrial Revolution -
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/
10_POINT_PLAN_BOOKLET.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/936567/10_POINT_PLAN_BOOKLET.pdf)

³⁷ See [Energy White Paper - Powering our Net Zero Future -
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/
201216_BEIS_EWP_Command_Paper_Accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945899/201216_BEIS_EWP_Command_Paper_Accessible.pdf)

The new Local Industrial Strategy has further refined priority sectors as:-

- Clean Energy
- Agri-Food
- Information and Communications Technology and Digital Creative

Whilst acknowledging the other underpinning sectors listed in the NSES.

Clean and Renewable Energy

Norfolk is well placed to be a global exemplar for clean, low carbon energy production, exporting services and skills globally, whilst increasing the availability of affordable sustainable energy for local communities and businesses. Norfolk has expertise in many forms of energy generation and sits at the heart of the world's largest market for offshore wind energy. Planned investment in renewable generation will make it a significant supplier of renewable energy to the UK. As well as a key role in the production of energy, Norfolk is also playing a leading role in the transition to a zero-carbon economy working with the Greater South East Energy Hub to deliver local projects at scale that benefit communities, private investors and businesses operating in the low carbon sector is a priority. Transforming the local energy system and new innovations in wider energy resource use will drive productivity gains across all businesses. Bacton Gas Terminal in North Norfolk is a major component of UK energy infrastructure, providing one third of the UK gas supply, making it an essential component in ensuring the future energy security of the UK. The Local Energy East Strategy sets out collective ambitions to 2030 underpinned by a range of activities that the Local Energy East Network and the Greater South East Energy Hub will take forward to ensure that the remains at the forefront of clean growth in the UK and grasps the opportunities ahead.

Life Sciences and biotech

Norfolk's life sciences sector is home to innovative, high-tech businesses and research institutions with close links to the food, health and agriculture sectors. Norwich Research Park (NRP) - comprising UEA, John Innes Centre, Earlham Institute, Quadram Institute, The Sainsbury Laboratory and Norfolk and Norwich University Hospital - is a world-leading research base, at the forefront of global food and health research. It is Europe's largest single site hub of research, training, education, and enterprise in food and health. The £76m Quadram Institute at NRP is helping create a fundamental shift in the way we understand and address the impact of food on health

The New Anglia Local Industrial Strategy sets out a range of actions that will be taken forward to maximise the clean agri-food opportunity including:

- Invest in a Food Innovation Hub based at the Honingham Food Enterprise Zone to deliver business growth through innovation, productivity, processing, exports and supporting new start-ups.
- Develop a world-leading hub for plant and microbial research at the John Innes Centre.

Advanced Agriculture Food and Drink

Home to an advanced and nationally significant farming sector, alongside globally renowned food and drink companies and a world-leading research base centred at Norwich Research Park (NRP). Building on Norfolk's historical agricultural strengths the sector is globally renowned and nationally significant.

Alongside this are a host of nationally and internationally significant food and drink companies, supported by a local supply chain of firms specialising in the manufacture of machinery and equipment to support them. This sector is an important employer in both rural and urban areas

Norfolk is home to the Honingham Food Enterprise Zone and to a world-leading research base centred at NRP, Norfolk is at the forefront of global agri-tech research, whilst innovative and export-intensive firms continue to develop commercially successful feeders, spreaders and pesticides.

Water Resources East has been set up to work in partnership to safeguard a sustainable supply of water for the east of England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential. Water Resources East is supported by all authorities in Norfolk either through the County Council's board membership or as standard members themselves.

ICT, Tech and Digital Creative

Norwich hosts a growing cluster of digital creative businesses. The New Anglia Local Industrial Strategy highlights plans to create a new digital hub in Norwich for the incubation of start-ups and accommodation of scale-up businesses in the digital and creative cluster. The University of East Anglia plays a key role in Norwich's tech community, supporting and connecting many of the active business groups. Norwich University of the Arts (NUA), with its specialism in arts, design and media, is centre of the dynamic creative community and home to the Ideas Factory incubation centre for digital creative businesses and user experience Lab.

Water Resources East³⁸ has been set up to work in partnership to safeguard a sustainable supply of water for the east of England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential. Water Resources East is supported by all authorities in Norfolk either through the County Council's board membership or as standard members themselves.

Visitor Economy - Tourism and Culture

A varied and rich tourist offer, from coast and countryside to postcard market towns, underpinned by a dynamic and pioneering cultural sector boasting internationally celebrated brands. Norfolk is a successful destination, evidenced by a thriving visitor economy. The area has traditional holiday destinations including the North Norfolk Coast and Great Yarmouth, together with unique natural assets such as the Broads National Park, the Brecks, and Areas of Outstanding Natural Beauty. It also has the home of important heritage sites such as Norwich (England's most complete medieval city). Norfolk's vibrant cultural sector boasts award-winning theatres, major international festivals such as Norwich, England's first UNESCO City of Literature. The cultural and heritage sector and natural landscape plays a unique role in creating the 'sense of place' that makes the area a great place to live, work, learn, invest and do business in. The sector is an important employer and attracts significant investment from national and international funding bodies.

Financial services and Insurance

Greater Norwich has been a base for financial industries for over 200 years and is one of the largest general insurance markets in Europe. Recognised as a centre for excellence for financial and professional services, Norwich is home to a significant cluster of global firms. Boasting a financially literate, highly-skilled and stable workforce, and the first National Skills Academy in the UK for financial services.

³⁸ See [Water resources East Website - https://wre.org.uk/](https://wre.org.uk/)

Transport, freight and logistics

Great Yarmouth port has a regional focus relating to the offshore energy sector. The sector is characterised by a strong logistics sector with international firms. Clustered around Norwich, there is also a sizable aviation sector, specialising in maintenance and repair, as well as servicing the offshore industry. The recently opened Aviation Academy, in collaboration with KLM Engineering, is a specialist centre of aircraft, overhaul and maintenance.

Construction and Development

Norfolk has a large and diverse construction and development sector, the UK's largest urban extension in Broadland and emerging specialisation in modern methods of construction and sustainable design. Norfolk's economy and attractive location for housing has driven economic success in the construction and development sector. The Construction Industry Training Board (CITB), a partner in the national Sector Skills Council for the construction industry, is based in Bircham Newton. The area has significant levels of employment across all construction-related industries. The sector also has an emerging specialism in modern construction and sustainable design, with the Fabric First Institute at Easton & Otley College.

Advanced Manufacturing and engineering

The advanced manufacturing and engineering sector in Norfolk reflects the area's diverse economic strengths. The sector links into the supply chain of specialisms such as agriculture and food production, civil aviation, transport and energy. Hethel Engineering Centre is the regional hub for innovation and technology and has the potential to expand to meet the demand for incubation space in this growing sector. Businesses are working together with UEA, through the New Anglia Advanced Manufacturing Engineering sector group, to develop a new Institute for Productivity. This will build on UEA's expertise in business education and engineering. There are several specialist advanced manufacturing and engineering companies in the area at sites including Hethel and Thetford.

Notwithstanding these clusters and our economic strengths, the challenge going forward is the Norfolk economy's high level of dependency on lower wage, lower-skill sectors such as food production, agriculture and tourism, and the related high concentrations of very deprived populations in some parts of the County and 'hidden' rural poverty elsewhere. This is reflected in productivity levels per head which are currently at 25% below the national average³⁹. This, coupled with low levels of investment, relatively poor infrastructure and skills attainment, impacts on potential future economic growth.

The development of this framework has concentrated on; identifying strategic sites, possible further interventions and cross boundary working that will need to be taken forward to deliver the shared objectives that have been agreed.

Supporting the growth of Norwich Research Park for example, and other key Enterprise Zone sites, will help to grow knowledge jobs in key sectors and enhance the commercialisation of research. A greater focus on supporting digital entrepreneurs will also help strengthen the growing cluster of tech/digital creative enterprises in and around Norwich's city centre, and strengthening supply

³⁹ See [East of England Forecast Model - https://cambridgeshireinsight.org.uk/eefm/](https://cambridgeshireinsight.org.uk/eefm/)

chains in the manufacturing, engineering and energy sectors will enhance business sustainability and employment growth.

5.2.4 Sector impact of the Coronavirus

The Covid 19 Economic Recovery Restart Plan will support the restart and renew of the local economy and focus activity on stabilising and renewing the foundation industries recognised in the Economic Strategy and Local Industrial Strategy, including the care and VCSE sectors. Economic activity will recover as lockdown is lifted, but the speed and degree is uncertain and will vary by sector, the impact on each sector is considered below:

Agri-food - Unprecedented demand at food retailers has put pressure on the food system in some areas, whereas the closure of the hospitality industry has created surplus in others.

Clean energy - The global pandemic has affected both the supply and demand for energy.

ICT digital - The lockdown has led to homeworking en masse, with people looking for new ways to work, learn, shop and socialise virtually. Home working will help support more rural areas but will require improved access to broadband and other digital connectivity (see section 9.5).

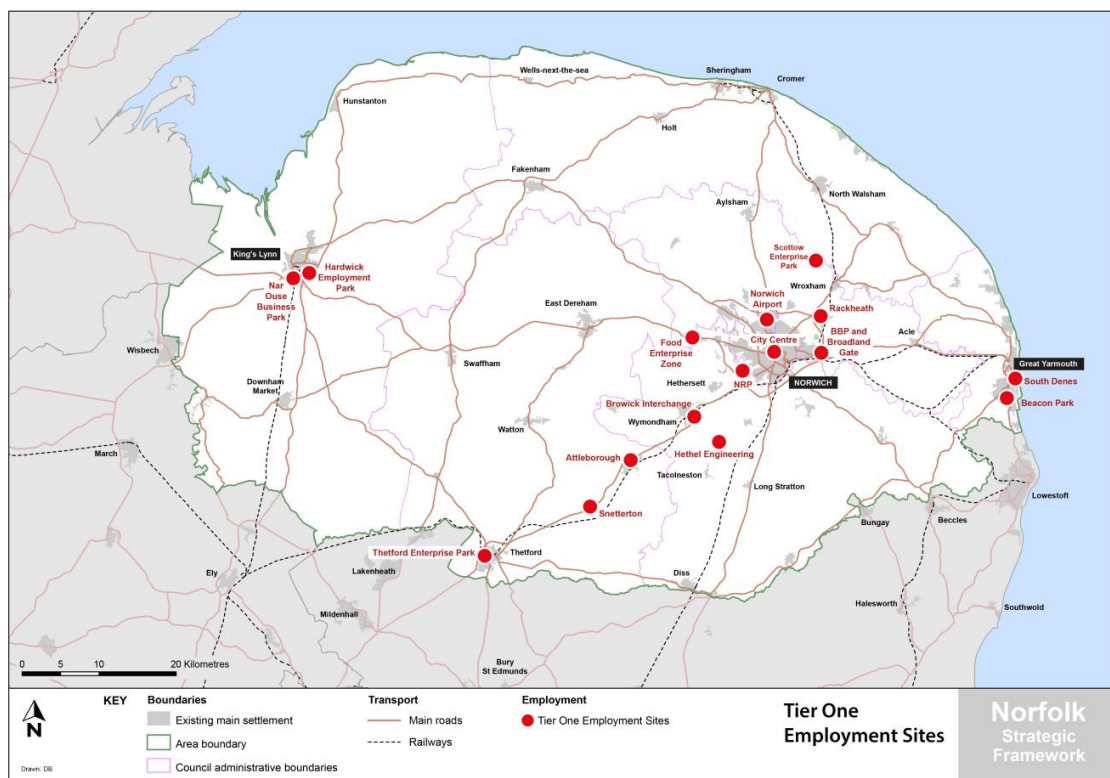
Visitor economy - The sector has been amongst the hardest hit, with businesses forced to stop trading just before the start of the season.

Health and social care - The pandemic has pushed the health and social care sector into the front line of dealing with the crisis. Nationally, care homes have seen high Covid-19 death rates in both residents and frontline staff, reinforcing the need for Personal Protective Equipment, correct training and capital Investment.

Voluntary - The pandemic has negatively affected resources, income and funding of third-sector organisations and impacted their ability to meet objectives in the longer term while demands continue to increase.

5.3 Strategic Employment Sites

Strategic employment sites have been agreed through joint activity on economic development and inward investment. They are all located in the growth locations identified in New Anglia LEP's Economic Strategy and Local Industrial Strategy and are targeted at the Norfolk and Suffolk Economic Strategy's key sectors. Therefore it is crucial to facilitate a step change in our economy and the focus of promotional activity.



Together they form a package of sites that provides a comprehensive offer for inward investment and strategic growth, a number of which have Enterprise Zone status. The number and availability of these sites gives Norfolk an economic advantage in attracting certain types of inward investment. In addition, as a result of their scale and type, these sites have additional potential through existing and planned close cross-boundary working. By their nature some of these sites form part of wider functional economic areas which span district/county boundaries, increasing potential for joint collaboration to enhance economic growth.

Agreement 8 recognises that these Tier 1 sites⁴⁰ should be protected from loss to alternative uses such as housing which is consistent with Paragraph 4.18 of the Housing White Paper which proposes that employment sites identified as “strategic” will not be subject to reduced protection from residential development. It is therefore proposed that the Tier 1 employment sites identified in Table 8 are formally recognised as “strategic” employment sites within Agreement 8.

⁴⁰ Tier 1 Employment sites are site identified by local authorities as significant in size (greater than 10 Hectares), Support key strategic sectors and support key growth locations.

Table 7: Tier one employment sites, sector, location and size. 2021

Site	Supports N&S Economic Strategy's Key Sector(s)	N&S Economic Strategy's Growth Location	Land available (approx.)
Attleborough	Advanced Manufacturing and Engineering	Tech Corridor	10 ha
Broadland Business Park area			
- plots on existing BBP			
- BBP Laurel Farm	Financial services	Greater Norwich	55ha
- St Andrews northside,	ICT & Digital Creative		
- Broadland Gate			
Browick Interchange (Wymondham)	Advanced Manufacturing & Engineering. ICT and Digital	Tech Corridor	20 ha
Food Enterprise Zone Honingham/Easton	Food, Drink & Agriculture	Greater Norwich / Tech-corridor	10 ha
Great Yarmouth Enterprise Zone and Energy Park sites:			
- Beacon Park (EZ)	Energy	Great Yarmouth and Lowestoft	13.5ha
- South Denes (EZ & EP)			25ha
Hardwick extension (King's Lynn)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10)	27 ha
Hethel Engineering Centre and Technology Park	Advanced Manufacturing & Engineering	Greater Norwich Tech Corridor	20ha
Nar Ouse Business Park (King's Lynn) (part EZ)	Advanced Manufacturing & Engineering ICT and Digital Creative	King's Lynn and Downham Market (A10 corridor)	17 ha (EZ)
Norwich City Centre	ICT and Digital Creative Financial Services Tourism and Culture	Greater Norwich	Multiple Sites
Norwich Airport			
- Aeropark			
- Southern area (around Hurricane Way)	Advanced Manufacturing & Engineering	Greater Norwich	75ha+
- Airport business park			
Norwich Research Park (part Enterprise Zone)	Life Sciences Food, Drink & Agriculture	Greater Norwich Tech Corridor	40ha (EZ 25ha)
Rackheath	Advanced Manufacturing and Engineering	Greater Norwich	25 ha
Scottow Enterprise Park	Logistics Energy	Greater Norwich/ North Norfolk	26 ha
Snetterton	Advanced Manufacturing & Engineering	Tech corridor	68ha
Thetford Enterprise Park	Advanced Manufacturing & Engineering Food, Drink & Agriculture	Tech corridor	18ha

Agreement 9 - The above list of locations are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses.

This list will need to be kept under review in the light of emerging Economic Strategy priorities and the progress on Local Plans.

5.4 Key Cross-Boundary Economic Issues and Interventions

This section identifies the principal strategic economic matters and other matters which can only be fully addressed through development plans in (or across) more than one local planning authority area. It therefore does not include a wide range of matters which whilst they are recognised as very important, but which do not meet the specific definition of strategic development 'Duty to Cooperate' matters laid down by the Localism Act. These include the generality of

- rural economy (including agriculture);
- tourism and recreation;
- development of market towns;
- Coastal Change;

Development associated and supporting these is addressed through individual local plans and informal joint working between local planning authorities, and these issues are addressed more widely through economic and other strategies. Neither is this section intended to include every economic issue that requires cross-boundary working, but just those of an extensive or special significance from a Norfolk wide perspective.

5.4.1 The role of Greater Norwich

Norwich and its immediate hinterland is the prime economic generator in the County. Its influence, and the policy measures required to make the most of this extend well beyond both the City Council's boundaries and the existing urban area.

A large part of the county depends upon the vibrancy of the city for employment, services, higher order retail, culture and leisure. It also has an economic importance as a public transport hub. The vibrancy and focus of activity in the city centre also attracts significant numbers of visitors, and helps make the wider area an appealing place to live, work, invest and locate businesses. The economy of this wide area of influence will benefit from ensuring that the city is accessible; the centre continues to thrive and is attractive to inward investment; and out of centre development complements the overall offer.

The Broadland Northway will support the delivery of planned housing and jobs to the north and north-east of Norwich. It will improve strategic access to a wide area of Broadland and North Norfolk. Realising the full range of economic opportunities will benefit from cooperation. The Airport supports the economy of the area including the off shore energy sector. The proposed Western Link will further enhance access to the Norwich Research Park, Food Enterprise Zone and Norwich Airport.

Broadland, Norwich, and South Norfolk, with Norfolk and the Broads Authority, are working through the Greater Norwich Development Partnership (GNDP) on the planning of the area.

The Five Year Infrastructure Investment Plan identifies the projects from the Greater Norwich Infrastructure Plan the delivery of which is considered to be a priority for achieving the economic growth targets, as set out in the Joint Core Strategy and the Greater Norwich City Deal. The Greater

Norwich Growth Programme identifies infrastructure schemes to be prioritised for delivery and development within each financial year, using pooled CIL funding.

The Norwich Area Transportation Strategy (NATS) identifies the transport improvements needed over the next 15+ years. The NATS Implementation Plan (agreed 2010, updated 2013) sets out a range of transport measures with their intended phasing for delivery over the short to medium term. The work is now branded as Transport for Norwich (TfN). The TfN Strategy is being reviewed and a consultation is expected later on in 2020. The Implementation plan is currently being developed through the work on Transforming Cities and a bid has been made to Government to fund a 3 year programme of delivery.

5.4.2 Cambridge to Norwich Technology Corridor

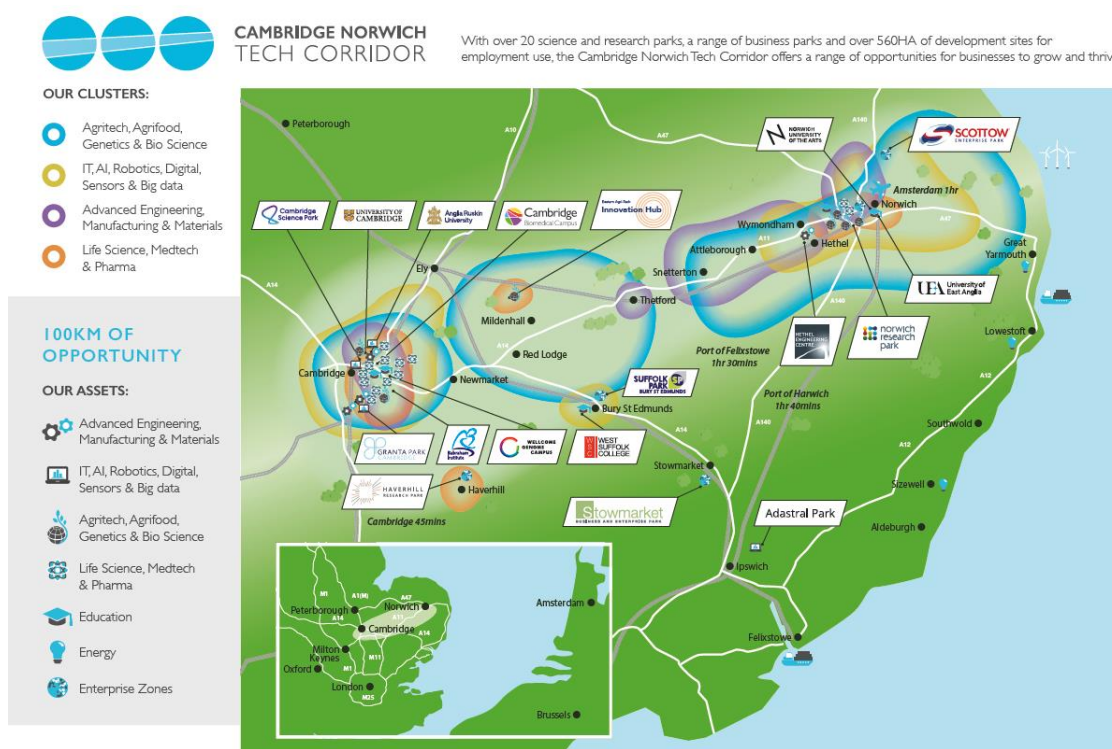
The corridor from Norwich to Cambridge, identified in Fig.7, includes a number of important existing and emerging clusters and strategic employment sites. It provides the potential for significant economic development, particularly as connectivity has improved with full dualling of the A11 between Norwich and Cambridge. The corridor also benefits from the Norwich to Cambridge railway line, direct trains between Norwich to Stansted airport and an increased number of internal and external route from Norwich Airport. These opportunities need to be supported and exploited to maximise economic benefits.

The corridor is identified as a key growth corridor in the New Anglia LEP's Economic Strategy, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan. The Cambridge Norwich Tech Corridor initiative⁴¹ has been established to maximise the economic benefits of this high quality location with its world class universities, research institutes and business clusters. The partnership will both capitalise on the talent pool, emerging clusters, low cost space, infrastructure networks, in conjunction with securing new investment for the area (e.g. SETI), to deliver innovation-led growth and investment.

In Norfolk the tech corridor extends through Norwich, South Norfolk and Breckland, and then into Suffolk and Cambridgeshire.

⁴¹ See [The Norwich Cambridge tech corridor website - http://www.techcorridor.co.uk/](http://www.techcorridor.co.uk/) for further information

Figure 7: The Cambridge Norwich Tech Corridor, 2019



5.4.3 A47 Corridor

The A47 crosses the county and, directly or indirectly, affects all Norfolk's districts, parts of Suffolk and Cambridgeshire. The current limitations of the A47 act as a brake on economic growth, hindering investment, adding business and commuter costs, cause disproportionate accident and safety issues and contribute to the 'peripheral' image of Norfolk. Improvements to the road will unlock jobs, increase GVA and attract additional private investment all along its length. The A47 Alliance comprises of representatives from all Local Authorities, the business community, MPs and stakeholders along the whole of the trunk road route between Peterborough and Lowestoft. The Alliance is working to make the case for improvements and to secure the necessary investment to implement these. Partners will need to consider how best to cooperate to realise the economic potential of improvements.

Further west on the A47, at Wisbech the emerging Garden Town proposal may result in up to 12,000 additional homes (on top of the 3,550 homes already allocated in the Fenland Local Plan) effectively doubling the size of the town. This is linked to a potential new rail connection which would put the town within commuting distance of Cambridge and Peterborough. The existing allocation relating to East Wisbech is incorporated into the emerging plan.

Currently there are four A47 road improvement schemes of direct relevance to Norfolk, committed to by Highways England

- Dualling the A47 North Tuddenham to Easton
- Dualling the A47 Blofield to North Burlingham
- Improving the A47/A11 Thicken junction
- Improving A47 Great Yarmouth junctions including reconstruction of the Vauxhall Roundabout

These A47 road improvements have the potential to support growing the corridor's economy.

5.4.4 Offshore Energy Sector / Ports of Great Yarmouth & Lowestoft

The ports of Great Yarmouth and Lowestoft are successfully developing their role in the huge growth in offshore wind generation and major planned gas field decommissioning in the southern North Sea, building on 50 years' experience in offshore energy. These ports also serve trade, fisheries and transportation sectors of the economy.

These two ports, in close proximity, together form a strategically significant economic (and infrastructure) resource, generating employment and supply chains of regional significance. The sector is also supported by businesses and facilities, such as Norwich Airport, in Greater Norwich. The critical mass of facilities, infrastructure and businesses helps the area compete with areas elsewhere, including on the other side of the North Sea.

There is a long and continuing history of collaboration between Great Yarmouth, East Suffolk, Norfolk and Suffolk Councils to make the most of these opportunities.

Through close cooperation, these bodies and the LEP were successful in bidding for an Enterprise Zone (EZ) covering six sites in Great Yarmouth and East Suffolk to strengthen and build the offshore energy sector in the area. This EZ is one of the most successful in the country, the only zone to have exceeded the original EZ targets. The two Norfolk sites in Great Yarmouth are South Denes and Beacon Park.

Great Yarmouth Borough Council, Norfolk County Council, Highways England and the New Anglia LEP have cooperated closely on developing the road transport infrastructure to support the growth of the offshore energy sector in Great Yarmouth. The third river crossing has now been through public examination as a Nationally Significant Infrastructure Project which will provide direct access to the Port from the trunk road network, rather than through the heart of the town as at present, and improving the A47 link to the rest of the country, construction is due to start in 2021.

Meanwhile Norfolk County Council with Great Yarmouth Borough Council, are looking at a range of new infrastructure projects associated with the port and the Great Yarmouth Energy Park in order to enhance the value of Yarmouth to the offshore renewables sector.

5.4.5 Norfolk Coast, the Broads and the Brecks

The Norfolk Coast, the Broads and the Brecks are the 3 key cross boundary areas of the county where economic benefits include not only their attraction for tourism and recreation, but also their contribution to quality of life, and hence the attractiveness of Norfolk as an area to live, work and to locate a business. The economies of these areas are dependent on businesses, infrastructure and environmental protection in surrounding areas. This is particularly the case for the Broads Authority Executive Area, where the Broads Authority boundary is very tightly drawn.

In order to maximise the economic benefits a number of issues require coordination across planning authority boundaries, including coastal change, erosion and flooding; environment, landscape and habitats; as well as tourism and recreation itself. By working together the relevant authorities can ensure complementary measures, and maximise potential economic benefits.

All the Norfolk coastal districts, together with the Broads Authority (part of which is on the coast), East Suffolk District Council in Suffolk, and the Environment Agency have worked together on one or more of the three Shoreline Management Plans covering the Norfolk Coast, developing understanding of the technical and political challenges involved, and coordination of efforts to address these.

The quality, importance and diversity of the natural environment, including the Coast, the Broads and the Brecks, is reflected in the numerous national and international designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, and Sites of Special Scientific Interest (SSSIs), and protected landscapes (Norfolk Coast Area of Outstanding Natural Beauty and the Broads). The planning authorities have a role in helping to protect and manage these assets, along with Natural England, the Environment Agency and a wide range of non-statutory environmental and community organisations. Ensuring that new development can proceed sustainably without harm to protected sites or species, or to biodiversity or geodiversity in the wider environment, is a particular challenge. Through joint working and cooperation across planning authority boundaries, a better understanding of the potential impacts from development (especially relating to housing and recreation) is being developed, and new ideas and best practice for monitoring and mitigating any impacts are being shared.

It is important that all of this care and concern about the natural environment continues to be captured within a Green Infrastructure approach, so that protecting and enhancing nature and natural processes are consciously integrated into spatial planning and area development.

5.4.6 A10 corridor

The A10, and parallel rail line from King's Lynn to Cambridge (passenger and freight), provides a strategic transport corridor. The section from King's Lynn to Downham Market is identified as a growth location in the Norfolk and Suffolk Economic Strategy. To realise the growth potential of the A10 Corridor there is a need to improve journey times, reliability of services and enhancement of operational capacity. Cambridgeshire County Council has commissioned studies of the economic potential and transport options for the route north of Cambridge. The Ely Area Capacity Enhancements Strategic Outline Business case was completed in Spring 2020 and has been approved. Proposals and options are expected to be consulted on in 2021 for the Ely area improvements to enable more frequent rail services to operate in future; while works have been completed to enable longer trains to run from King's Lynn from December 2020. A new Cambridge North railway station has enabled improved access to jobs in the businesses on the north side of Cambridge for Norfolk residents. There is potential for large-scale job growth in the corridor at Downham Market; while the largest housing allocation in the west at West Winch/North Runcton requires the completion of the West Winch Relief Road and Hardwick junction improvements to be fully developed.

Agreement 10 - The recently adopted and emerging Local Plans for the area will include appropriate policies and proposals to recognise the importance of the above cross boundary issues and interventions.

Section 6 – Housing

Strategic Housing Objectives

To address housing needs in Norfolk by:

- providing for the quantity of housing growth which will support the economic prospects of the County and address in full the identified need for new homes in line with the Economic Strategy of the New Anglia LEP and, Local Industrial Strategy and Covid 19 Economic Recovery Restart Plan;
- ensuring that new homes built are of the right sort in terms of size, type, and tenure to contribute positively towards addressing identified needs including for affordable homes, homes for the elderly and students, and other groups in society requiring specialist living accommodation;
- Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (e.g. through S106 agreements and/or Community Infrastructure Levy)
- contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services;
- delivering high quality, energy efficient homes in attractive communities which make a positive contribution to the health and well-being of communities; and
- ensuring that homes are delivered at the right time to address identified needs.

6.1 Introduction

The overall objective of national policy is to ensure that sufficient homes of the right type, are built in the right locations, and at the right time to address all existing and newly arising needs for homes. This means meeting both the market *demand* for new housing and addressing the *need* for homes including the needs of those who are currently unable to afford to buy or rent a suitable home locally. Homes built should be of the right type having regard to needs of the existing and future population and should address the specific needs of groups such as the elderly, those with disabilities, students and the gypsy and traveller community. Local Plans should include measures to address the need for appropriate specific types of dwellings, those wishing to build their own home, starter homes to purchase and other tenures of affordable housing. Whilst this document considers the likely scale of growth in the different parts of the County, it is not its purpose to determine how many new homes are required or where precisely these should be located. These will be decisions for individual Local Plans or any County wide development plans which may be prepared. Instead the focus is on cross boundary strategic considerations concerning, for example, the capacity of each authority to accommodate the required growth, considering how growth in one area may have impacts elsewhere, the need or otherwise to redistribute growth beyond the administrative boundaries of individual authorities and the implications of this, or the need to take collective measures to improve the rates of housing delivery in the County.

In February 2017 the Government published the Housing White Paper “Fixing our Broken Housing Market”⁴². This document set out a broad range of reforms that Government planned to introduce to help reform the housing market and increase the supply of new homes with the principal aim of increasing housing delivery in England to 300,000 net additional dwellings per year by the mid 2020’s.

Many of these measures were subsequently introduced via the updated National Planning Policy Framework including a new standardised national methodology to be used for calculating the minimum number of new homes which might be required. In December 2020 the government announced a further modification to the standard methodology for the top 20 cities and urban areas, however this hasn’t impacted the county. The government has also introduced a Housing Infrastructure Fund⁴³, published a Garden Communities Prospectus, invited bids for Housing Deals, and has committed to spending an additional £2 billion on affordable homes, all measures targeted at delivering an increased supply of homes. It is clear that increasing the delivery of new homes is likely to remain a major priority for the UK government for the foreseeable future.

Based on the government’s current standard methodology⁴⁴ Norfolk Authorities will need to collectively plan for at least an additional 65,856 (4,116 per annum) homes between 2021 and 2036. Many of these new homes are already included within adopted Local Plans in the County and a significant proportion already have planning permission.

As part of the duty to co-operate, and as reflected in the remainder of this section the Norfolk Authorities have reached a number of key agreements both about the geographical area over which it is most appropriate to prepare Local Plans, the period to be planned for, and how each plan will provide at least the minimum number of dwellings required over the agreed period. In reaching these Agreements the authorities have had regard to the needs which may arise from outside of the County and have collectively agreed a process for establishing each areas capacity to accommodate growth.

⁴² Available at [the housing white paper web page - https://www.gov.uk/government/collections/housing-white-paper](https://www.gov.uk/government/collections/housing-white-paper)

⁴³ Available at [the housing infrastructure fund web page - https://www.gov.uk/government/publications/housing-infrastructure-fund](https://www.gov.uk/government/publications/housing-infrastructure-fund)

⁴⁴ Derived from the ONS 2014 household projections

6.2 Existing targets, supply, and delivery rates up to 2021

The number of dwellings built in the County since 2007 have generally fallen behind published Local Plan targets due to the impact of the recession. As a consequence, the required annual rate of housebuilding required to meet existing Local Plan targets has been increasing as local authorities seek to address shortfalls. Furthermore to ensure that local targets can be addressed national policy⁴⁵ requires that each authority provides a buffer of deliverable supply thus ensuring that at all times more deliverable supply is available than is required to meet needs alone, with the size of the buffer determined by delivery rates over the preceding three years. This has resulted in some areas having very high annual targets over the next five years which are well above the long term requirements set out in their respective Local Plans or produced by applying the standard methodology.

It is likely that this trend of increasing annual rates of housebuilding requirements will not continue in the future, for two reasons: firstly, the rate at which housing is being delivered is increasing; and secondly, local planning authorities need to keep their assessments of housing need and local plans up to date. In reviewing housing need, the appropriate level of backlog that needs to be addressed is reconsidered and in parts of the County it appears that current levels of backlog arise in part from historic projections of levels of net in-migration in the period 2008-16 being considerably higher than the actual net in-migration levels that were observed during this period. Therefore, as new Local Plans are adopted, there may be tendency for rates of housebuilding required in the short term (i.e. the next five years) to reduce from their current levels due to reassessment of the backlog element within them.

It should also be noted that land supply issues may ease because since the recession and particularly the publication of the National Planning Policy Framework in 2012, the number of unbuilt planning permissions has also been increasing, resulting in a large stockpile of consented sites.

In practice, delivery rates of housing development will vary considerably from one year to the next, with significant periods of under-delivery in some years and over-delivery in others, depending on a wide range of factors including site availability, economic conditions, and the capacity of the local building industry. The impacts of the coronavirus pandemic on completion rates also remains unclear. For this reason annualised targets represent a blunt instrument against which to assess delivery. Individual authorities will continue to consider carefully how new housing needs evidence might be taken into account appropriately in plan-making and the determination of planning applications.

Detailed information on the availability and deliverability of new housing is published annually by each authority in their Five Year Land Supply Statements.

⁴⁵ National Housing Delivery Test – Results of this test are published by government in November of each year and compare the number of dwellings built over a three year period with the number required.

6.3 Future Housing Demand and Need until 2036.

The National Planning Policy Framework requires that the need for homes in terms of quantity, size, type and tenure within an area is addressed by planning authorities when preparing Local Plans, unless the consequences of doing so would result in unsustainable development. Where planning authorities conclude that it is not desirable to address identified needs within an individual authority area they should reach agreement with others to ensure that needs are met.

Following the publication of the revised NPPF in Feb 2019 the quantity of homes needed should be calculated in accordance with the new standard method in national guidance. This applies a fixed uplift to household projections based on the relationship between local incomes and house prices for each authority area with the result being capped to ensure that resulting figures are no more than 40% above existing requirements for any individual authority. The method was varied in February 2019 to make it clear that the baseline for the calculation should be the 2014 based household projections rather than the most recent projections. In some parts of the County the application of the standard methodology has resulted in the need to deliver higher quantities of new homes than was previously the case as identified in Strategic Housing Market Assessments.

Table 9: Local Housing Need based on mid 2014 household projections applying standard national methodology using the projected average annual household growth from 2020 to 2030 (correct as at November 2020)

Area	Annualised housing need in SHMAs	Annualised housing need applying standard methodology (2014 base)	Variation
Breckland	584 ⁴⁶	661	+77
Broadland	389	517	+128
Great Yarmouth	420	357	-63
KLWN	670	538	-132
North Norfolk	405	552 ⁴⁷	+147
Norwich	724	598	-126
South Norfolk	763	893	+130
Broads Authority (Norfolk part)	11	n/a ⁴⁸	
Norfolk	3,966	4,116	+150

⁴⁶ Note as the Breckland Local Plan is covering a period of 2011-36 it's annualised OAN is considered to be 612pa rather than 584pa as this reflects under delivery in the period 2011-15

⁴⁷ At this point in time North Norfolk is considering if an alternative approach to establishing OAN is justified

⁴⁸ The Government Consultation said 'where local planning authorities do not align with local authority boundaries, such as National Parks, the Broads Authority and Urban Development Corporations, available data does not allow local housing needs to be calculated using the standard method set out above'. In these cases we propose that authorities should continue to identify a housing need figure locally, but in doing so have regard to the best available information on anticipated changes in households.

The evidence⁴⁹ concludes that Norfolk is covered by all, or parts of, three separate Housing Market Areas and this has led to agreement about producing evidence and appropriate planning areas.

Strategic Housing Market Assessments have been prepared for each of these Housing Market Areas which prior to the publication of the Standard National Housing Needs Methodology identified the objectively assessed needs for new homes within each HMA and for each separate District within them. New evidence, including revised national population and household forecasts, will be published at regular intervals and Authorities will use the latest available information from a range of sources in relation to both demand, and their ability to plan a sustainable supply, when determining final housing targets for inclusion in Local Plans.

To ensure better alignment of Local Plans all Norfolk Authorities have agreed to prepare new Local Plans which address the level of housing need for the period until at least 2036 and have formally commenced the process of plan review. Broadland, Norwich and South Norfolk are producing a single Greater Norwich Local Plan allowing for consideration of how needs might be addressed across the larger plan area.

Agreement 11 - When determining their respective Local Plan housing targets each Norfolk Authority, working together where desirable, will aim to deliver at least the local housing need as identified in the most up to date evidence (Table 9). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.

The Broads

The total OAN in the Broads Authority Executive Area between 2015 and 2036 is 286 dwellings (approx. 14 per year). In the Central Norfolk SHMA these figures are broken down between the overlapping Districts as follows:

Table 10: Projected dwelling need within the Broads Authority area 2015-2036

	Broadland	North Norfolk	Norwich	South Norfolk	Great Yarmouth	East Suffolk
Total OAN	50	70	3	40	66	57

⁴⁹ **Central Norfolk Strategic Housing Market Assessment 2017** - covering Norwich, Broadland, and South Norfolk authorities, together with substantial parts of North Norfolk, Breckland and the Broads Authority, together with a more marginal interaction with other parts of Norfolk and Suffolk. **King's Lynn and West Norfolk Strategic Housing Market Assessment** - Covering the administrative area of King's Lynn and West Norfolk Borough Council.

Great Yarmouth Strategic Housing Market Assessment - Covering the administrative area of Great Yarmouth Borough Council.

In view of the special qualities of the Broads there has been a long standing agreement between the BA and their overlapping local councils about the other areas planning to meet any housing needs arising in the BA area⁵⁰. It would clearly not be in the best interests of good planning in Norfolk for planning in the Broads area to be driven by a need to meet statistically derived housing targets where this would be incompatible with the protection of the special qualities of the Broads. Agreements 11 and 12 below addresses this matter although it should be noted that emerging evidence suggests, with the possible exception of the part of the BA area in Great Yarmouth Council area, that the BA will be able to find sufficient sites for housing to meet identified needs within its own area in locations considered to be compatible with the protection of the Broads.

Agreement 12 – The Broads Authority will meet its calculated portion of the wider housing requirement as far as is compatible with the protection of the Broad’s landscape and special qualities.

Agreement 13 – South Norfolk, Norwich City, Broadland, North Norfolk, and Great Yarmouth Councils will seek to include appropriate provision within their Local Plans to address the housing needs arising from the parts of the Broads Authority area overlapping their administrative boundaries if these cannot be met within the Broads Local Plan.

East Suffolk Council (and hence not signatories to this framework) have also agreed to do the same.

Implications of the City Deal for Housing

In December 2013 the Greater Norwich City Deal was signed⁵¹. The City Deal was expected to see 300 new businesses supported and secure an additional £100 million of private investment. The deal was also expected to create more than 19,000 jobs, including 3,000 high value jobs at Norwich Research Park, 2,000 jobs around Norwich Airport, 1,000 jobs based around Norwich University of the Arts and 6,000 construction jobs.

The housing implications of the City Deal were assessed thoroughly as part of the Central Norfolk SHMA. This calculated that an upward adjustment of 9,505 dwellings to the housing requirement was needed to ensure sufficient homes are provided to meet the needs of the additional workers resulting from the City Deal. However, as the OAN for the Central Norfolk Authorities already included a response to market signals, it concludes that additional provision is only needed in the three Greater Norwich districts where the implications of the City Deal exceed the response to market signals already built into the figures. Because of the changes in calculating housing need the additional provision will be reconsidered within the Greater Norwich Local Plan.

Agreement 14 – Broadland, Norwich City, and South Norfolk Councils will seek to deliver an additional supply of homes within the Greater Norwich Local Plan to ensure the housing needs arising from the City Deal are met in full.

⁵⁰ See [Planning for Housing and Employment in and Around the Broads Memorandum of Understanding - http://www.broads-authority.gov.uk/_data/assets/pdf_file/0008/432998/Duty-to-Cooperate-Planning-For-Housing-and-Employment-in-and-Around-the-Broads-Proposed-Memorandum-of-Understanding-040113.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0008/432998/Duty-to-Cooperate-Planning-For-Housing-and-Employment-in-and-Around-the-Broads-Proposed-Memorandum-of-Understanding-040113.pdf)

⁵¹ See [Norwich City Deal - https://www.gov.uk/government/publications/city-deal-greater-norwich](https://www.gov.uk/government/publications/city-deal-greater-norwich)

6.4 Type of Homes

It is critically important to ensure that sufficient homes are provided but it is equally important that the homes that are built are the right type in terms of size, affordability and tenure. In this regard key issues affecting the County are providing suitable homes for:

- Those on lower household incomes who are unable to afford market prices and rents
- A rapidly aging population
- A growing student population in and around Norwich
- Gypsy and Traveller communities

Collectively, the Authorities are committed to the delivery of energy efficient homes which minimise the inefficient use of scarce resources and each Local Plan will consider the desirability of requiring enhanced construction standards which go beyond the requirements of the current National Building Regulations. For example, all authorities in the County have committed to introducing lower water consumption targets for new dwellings and most are likely to introduce enhanced accessibility requirements. Further consideration is also given to this area in the section on climate change.

Unless there is a significant increase in earnings or a slowing rate of house price increases the evidence concludes that dwelling affordability will continue to be a major issue in most parts of the County. Delivery of affordable homes, as with other types of housing has failed to keep pace with existing and newly arising needs. Forecasts indicate that across the County as a whole some 26% of the total future housing requirement will need to be provided as affordable homes but this masks significant local variations.

The significance of this issue for Norfolk should not be underestimated. There would be particularly severe impacts on a number of key economic sectors if housing affordability worsens and there is not considerable increase in the availability of forms of housing that meet the needs of people who are employed in low wage sectors across the county. The situation will vary from one council area to another so is best addressed through local plans rather than through collective agreement.

Inward migration from the rest of the UK, mainly due to retirement to the area, is forecast to be the major driver of population growth in the County over the next 20 years and a rapidly aging population, particularly outside of the three main urban centres will continue to increase the need for homes. By 2036 over 15% (153,372 people) of Norfolk's population is forecast to be over 75 years of age and if current trends continue this will increase the need for specialist forms of accommodation such as care, nursing and assisted living schemes. These specialist accommodation needs are not included within household projections and authorities should carefully consider the latest available evidence and develop strategies to ensure these needs are met. If current trends continue an increasing proportion of elderly people will remain in their homes for longer periods.

Specialist types of accommodation

Strategic Housing Market Assessments are prepared to establish the likely total need for new dwellings over a given period. These assessments quantify the needs of those residing in households including gypsy and travellers and those living in caravans and houseboats but they do not account for those living in other types of communal accommodation such as care and nursing homes and student halls of residence. Therefore in addition to the target for new dwellings Local Plans will need to separately quantify and provide for other specialist types of accommodation and fully understand the relationship between the need for new dwellings and the need for different types of non-household accommodation.

Elderly People

The identified Objectively Assessed Need across Norfolk includes the conventional housing needs of elderly people, but does not include people residing in care and nursing homes. On this basis, all self-contained elderly person housing is counted within the housing supply; but the supply of bed spaces in residential institutions (Use Class C2) is not. If sufficient Class C2 bed spaces are not provided then these people will not vacate existing dwellings and therefore more dwellings may be required.

As section 4 highlights, latest population projections estimate an increase in 65's of over 78,000 between 2018 and 2036 in the county. Local planning authorities were clear that further research was required into their housing needs. As part of the work to update this document a study was commissioned to identify the need and types of accommodation which are required to support the increase in the elderly population going forward.

The study has now been completed and highlights that a range of housing types are required to meet the needs of the elderly. It should be noted the many residents will be able to remain in conventional type of housing for many years but may choose to downsize or move to more suitable types of home like bungalows. Therefore housing types range from conventional housing (either modified or unmodified), age exclusive housing, sheltered housing with low level support to higher level support housing with on-site support or residential/nursing care homes. There are currently 8,612 units of specialist independent retirement housing in Norfolk, 78% of these units are sheltered⁵² housing with low level support and only 22% are extra care with higher level support⁵³. Across the whole of Norfolk in 2020 there is unmet need for 2,826 units of extra care housing and 4,034 units of sheltered housing. By 2041 these figures will have risen to 5,149 and 10,384 respectively. The report also highlights that care homes will also need to accommodate an additional 5,239 people and better provision should also be made for elderly with various levels of dementia with Norfolk likely to see an increase in residents with dementia by nearly 10,000 to 2041. Full details can be found in the report accompanying this study⁵⁴ Norfolk Local Authorities will work with registered providers and housing associations to support the delivery of specialist housing to meet the needs of an increasingly the elderly and retired population.

⁵² Sheltered housing is age restricted housing normally with either an onsite or visiting scheme manager or access to a bespoke helpline. There will normally be communal facilities which may include a café or shop but there is no bespoke site specific care package. Scheme residents are typically 75 or over, but the scheme may include some residents aged 65-74

⁵³ Extra Care housing is age restricted housing with an onsite scheme manager and provide a range of communal facilities. However residents will also have access to a site specific bespoke care package, usually including paying for a specified minimum number of hours of care a week with the option to increase usage if required. The care provider is CQC registered with specific carers allocated to the scheme. Scheme residents are typically 75 or over. Extra care housing can also be known as very sheltered housing, assisted living, enhanced sheltered or as housing with care.

⁵⁴ Link to study once published

Student Housing and the OAN

Planning Policy Guidance was updated in March 2015 to include specific reference to identifying the needs of students. It requires that Local Planning authorities should plan for sufficient student accommodation whether it consists of communal halls of residence or self-contained dwellings, and whether or not it is on campuses.

The largest higher education provider in Central Norfolk is the University of East Anglia (UEA). The University has a campus in Norwich and a total of 16,030 full time students (academic year 2018/19). In 2017 the University had 4,300 bed spaces on the campus (and nearby village) and 305 bed spaces in the city. Norwich also contains the Norwich University of the Arts which has 2,250 full-time students, with further students at City College and Easton College. In recent years however, there has been an increase in the provision of privately owned and managed purpose built student accommodation across Norwich City including significant accommodation at Pablo Fanque House, Ber Street and St Stephen's Towers.

The Central Norfolk Strategic Housing Market Assessment concludes that based on historical trend the student population in and around Norwich is likely to grow by around 420 students per year. The SHMA assumes that this student population will live in dwellings and this need is added to the OAN requirement for new homes. If accommodation is provided in the form of student halls of residence or other specialist student accommodation provided by the private sector the OAN dwelling requirement can be reduced accordingly at a suggested ratio of one dwelling reduction for each three bed spaces provided.

However, in 2018 Planning Practice Guidance updated the advice on including student housing within housing supply figures⁵⁵. Student accommodation can be included based on the amount of accommodation that new student housing releases to the wider housing market, and the extent to which this allows general market housing to remain in such use. Local authority's calculations should be based upon the average number of student living in student only accommodation using the most recently published census data. On this basis, student accommodation supply in Norwich should be counted at a ratio of 2.85 bedrooms to 1 equivalent dwelling, except for studio apartments which can be counted on a 1 for 1 basis. For delivery purposes, the Housing Delivery Test Rule Book⁵⁶ outlines that student accommodation should be counted at a ratio of 2.5 bedrooms to 1 equivalent dwelling. These ratios will be updated as necessary.

⁵⁵ [Planning Practice Guidance - https://www.gov.uk/guidance/housing-supply-and-delivery](https://www.gov.uk/guidance/housing-supply-and-delivery) Paragraph: 034
Reference ID: 68-034-20190722

⁵⁶ [Housing Delivery test - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728523/HDT_Measurement_Rule_Book.pdf)

The City Council also adopted the Purpose Built Student Accommodation (PBSA) Evidence and Best Practice Advice Note⁵⁷ in 2019. This advice note includes an assessment of the need for PBSA from UEA and NUA higher education institutions, guidance on a range of issues relating to the design and management of PBSA and how to encourage a mix of accommodation for a wide range of students. By encouraging good quality and appropriate student accommodation in Norwich, this advice note helps to support the success of the city's higher educational institutions and the city's economic prospects. As part of this Norwich City Council has set up a working group with the two main higher education institutions in Norwich that are likely to generate student housing need, and meets periodically to discuss how to help meet the need for PBSA in terms of student numbers and growth, to better inform planning decision making and the plans of Higher Education Institutions and to provide a forum to explore how high quality and affordable student accommodation can be achieved in Norwich.

The draft Greater Norwich Local Plan, due to be published for Regulation 19 consultation in February 2021, will contain a policy to support PBSA as part of policy 5(Homes).

Accommodation needs of Gypsies, Travellers, and other types of accommodation

The accommodation needs of Gypsies and Travellers, including Travelling Show people, and those residing in boats and mobile/park homes are included within the overall assessments of housing need and comprise part of that need rather than an additional requirement. These types of accommodation which are provided can therefore count towards addressing locally set housing targets. Locally authorities have prepared specific evidence to quantify the levels of need for such accommodation and use this evidence to inform Local Plan preparation. Five Norfolk authorities (Broadland, Gt Yarmouth, North Norfolk, Norwich and South Norfolk), plus the Broads Authority, commissioned a Caravans and Houseboats Needs Assessment to 2036, which was completed in October 2017⁵⁸. Breckland DC commissioned its own study⁵⁹ and the Borough Council of King's Lynn and West Norfolk is a partner in a Cambridgeshire-based needs assessment⁶⁰. Greater Norwich are updating their study and this is expected to be completed in spring 2021.

Agreement 15 - The Norfolk Planning Authorities will quantify the need for, and plan to provide for, the specialist accommodation needs of the elderly, students, gypsy and travelling Show People, and those residing in other specialist types of accommodation and working together will ensure that the distribution of provision responds to locally identified needs.

⁵⁷ [Purpose Built Student Accommodation \(PBSA\) Evidence and Best Practice Advice Note -
https://www.norwich.gov.uk/downloads/file/5448/pbsa_best_practice_and_advice_note -
adopted november 2019](https://www.norwich.gov.uk/downloads/file/5448/pbsa_best_practice_and_advice_note_-_adopted_november_2019)

⁵⁸ See [Caravans and Houseboats Needs Assessment to 2036 - https://www.north-norfolk.gov.uk/media/4081/norfolk-final-ana-09-10-17.pdf](https://www.north-norfolk.gov.uk/media/4081/norfolk-final-ana-09-10-17.pdf)

⁵⁹ See [Breckland Gypsy and Traveller Accommodation Assessment -
https://www.breckland.gov.uk/media/2662/Breckland-Gypsy-and-Traveller-Accommodation-
Assessment/pdf/2016_11_29_Breckland_GTAA_Final_Report.pdf](https://www.breckland.gov.uk/media/2662/Breckland-Gypsy-and-Traveller-Accommodation-Assessment/pdf/2016_11_29_Breckland_GTAA_Final_Report.pdf)

⁶⁰ See [West Norfolk Gypsy and Traveller Assessment - https://www.west-norfolk.gov.uk/download/downloads/id/2579/gypsy_and_traveller_accommodation_assessment_2016.pdf](https://www.west-norfolk.gov.uk/download/downloads/id/2579/gypsy_and_traveller_accommodation_assessment_2016.pdf)

Other forms of specialist accommodation such as self-build and accommodation for military personnel will be addressed by individual authorities but the Norfolk Strategic Planning Member Forum will keep this position under review.

6.5 Capacity and Distribution

Some parts of the County are more constrained than others and their capacity to accommodate new growth is similarly variable.

Each Authority has prepared Housing and Economic Land Availability Assessments (HELAAAs) using a standardised methodology which has been agreed by all Authorities. These are assessments of unconstrained capacity and take no account of the policy choices that each authority may make when preparing their Local Plan. It is anticipated that Norwich City, Broadland and South Norfolk will work jointly to address their shared housing need through the Greater Norwich Local Plan with other District Authorities having the capacity to address its own housing need.

Agreement 16 – All Norfolk Planning authorities will produce their Housing and Economic Land Availability Assessments to the standard Norfolk methodology.

6.6 Delivering Housing Growth

Over the past decade the quantity of new homes delivered in the County has not kept pace with published targets notwithstanding that the number of planning permissions granted typically exceeds the required quantity of development. This is likely to have been compounded by economic recession and poorer housing market conditions in some areas which may have reduced developer confidence.

Slower than required delivery rates have resulted in inadequate or marginal five year land supply positions resulting in the need to release unplanned development sites in some parts of the County. Recognising this, and reflecting the provisions of the Housing White Paper the Norfolk Authorities have agreed to take a range of actions to improve future housing delivery.

Agreement 17 - To minimise the risk of slow delivery over the next plan period, where it is sustainable to do so, the following will be done:

- **Housing strategies will seek to allocate a range of different sizes of sites, where such sites are available and would result sustainable development.**
- **Clear evidence and demonstration of ability to deliver development will be required prior to the allocation of larger sites for development.**

However, such is the scale of delivery challenge facing the County there may well be the need for further actions to be taken to ensure housing targets can be met. Norfolk authorities jointly commissioned a study to look further into the issues impacting delivery within the county. The report highlighted 10 measures to be considered which will be further addressed by Local Authorities in bringing forward their Local Plans:

- Allocating a balanced range of sites and scales of development
- Enable early stage engagement with high profile councillors and leader of the Council to facilitate stakeholder buy-in and community liaison at the site allocation stage.

- Support and encourage allocation and development of retirement developments, single storey dwellings, lifetime homes and extra care facilities for independent elderly living in suitable environments
- Use Planning Performance Agreements where appropriate for larger scale and more complex housing sites
- Employ or nominate strategic development officers to focus on larger scale growth allocations and assist developers through the planning process. These staff may be a shared resource between neighbouring authorities.
- Seek to invoke Service Level Agreements for Utilities and Network Rail related infrastructure where large scale sites are reliant on strategic interventions.
- Review the s106 approach for larger scale sites and consider a hybrid approach with early phases considered in more detail than later phases to enable flexibility for sites which have longer timeframes.
- Facilitate the creation of a county-wide developer forum
- Consider whether statutory powers can be used to assist with unlocking difficult sites
- Work up a funding strategy with the local highway and flood authorities to support sites where major infrastructure is required and this is not covered by CIL.

Alongside these possibilities there may also be other measures taken which would complement these actions:

- Greater support with infrastructure planning in relation to large scale plans for urban expansion to increase confidence and reduce risks for the industry and make them more attractive for housebuilders to build out at quicker rates than in the past. Increasing the number of housebuilders active in the Norfolk market and increased use of modular (off-site) building techniques will also assist here;
- Action to stimulate the SME's in the construction sector to increase the number of firms capable of building on the scale of sites that typically result in 5-50 dwellings being provided;
- Action to stimulate the self and custom build sector considerably.
- Further joint working to improve the speed, customer focus, predictability and efficiency of the planning system; and
- A considerable drive to increase the number of people entering the construction sector across the board, particularly in the light of the probable impact of Sizewell C construction on the market of skilled construction labour in Norfolk.

It should be noted that authorities housing delivery will be measured against the Housing Delivery Test (HDT) and if under 95% - authorities will be required to produce 'Action Plans' to address shortfalls in delivery.

Section 7 – Health

7.1 Introduction

The origins of the planning system are closely associated with wider health improvements and recognise that where people live, work, study and relax play a greater role in health and well-being at a population level than just access to health care. Equally we know that as population size and structure change, for example an aging population, so the demands upon health care facilities increase alongside the ever increasing need to prevent ill health in the first place. These matters are not influenced solely on an individual planning authority basis. Services are arranged and delivered across multiple boundaries. People move between areas to do different things and across their lifetime. Transport routes and methods inevitably impact wide geographic areas.

Health services in Norfolk are provided at geographies which extend beyond district and borough boundaries. The Norfolk and Waveney Clinical Commissioning Group covers the whole of Norfolk and also the former district council area of Waveney (in north-east Suffolk). Public Health provision is provided at the national, regional and local level (subject to recent national changes).

Given that the various healthcare organisations operate across district and borough boundaries it is considered that there is merit in looking at consistent approaches to planning for health and well-being across the Norfolk local planning authorities.

Consequently, the need to co-operate between agencies and across geographies is important.

7.2 Principles

The National Planning Policy Framework (NPPF) requires that ‘planning policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles’⁶¹. The health and wellbeing of the population, and health infrastructure should be considered in both plan and decision making.

The Planning White Paper (2020 paragraph 1.7) recognises that: “Where we live has a measurable effect on our physical and mental health, on how much we walk, on how many neighbours we know or how tense we feel on the daily journey to work or school. Places affect us from the air that we breathe to our ultimate sense of purpose and wellbeing.”

The TCPA has advocated the impact of good planning decisions through its Reuniting Health with Planning workstream since 2010 and has worked in partnership with NHS England, Public Health England and Sport England.

The review of Health Equity in England by Sir Michael Marmot⁶² highlights the need to build healthy and sustainable communities as one of 6 core recommendations to address the widening health inequalities. It states that ‘since 2010 life expectancy in England has stalled; this has not happened since at least 1900.....health is closely linked to the conditions in which people are born, grow, live, work and age’. There are clear links made to the quality, cost and condition of housing in the report,

⁶¹ NPPF revised Feb 2019, Chapter 8

⁶² See [Health Equity in England - https://www.health.org.uk/funding-and-partnerships/our-partnerships/health-equity-in-england-the-marmot-review-10-years-on](https://www.health.org.uk/funding-and-partnerships/our-partnerships/health-equity-in-england-the-marmot-review-10-years-on)

‘The costs of housing have increased significantly, including social housing, impacting on all the other social determinants of health and pushing many people into poverty, homelessness and ill health.’

The need for health infrastructure provision takes place in the context of:

- Stalling of life and healthy life expectancy rates (in the last decade 2011 onwards)
- Widening health inequalities and likely aggravation of this arising from impacts of Covid-19
- An increasingly ageing population, with impacts on health and social care provision and costs⁶³
- The number of premature deaths increasing, caused by smoking, lack of physical activity, obesity and alcohol misuse.⁶⁴ The UK wide NHS costs attributable to overweight and obesity are projected to be £9.7 billion a year by 2050 with wider costs to society estimated to reach £49.9 billion per year⁶⁵
- Increase in demand for mental health and wellbeing services
- Changing approaches to healthcare delivery.

7.3 Healthy living and Wellbeing – through better design

It is clear that health issues are increasingly important considerations in future planning activities. Therefore, development should facilitate a healthy lifestyle and provide opportunities for a high quality of life through a healthy environment where pollution is controlled and there is adequate access to open spaces and green and blue infrastructure. Availability of suitable and affordable housing and employment opportunities are also critical factors, as is access to active travel opportunities and affordable and practical public transport. It is also likely that, at least in the short to medium term, active consideration will need to be given to increased home working, space standards and overcrowding in homes and internal ventilation.

New developments present an opportunity to build homes, streets and neighbourhoods that support and enable healthy lifestyles through high quality provision of walking, cycling and accessible public transport. Good quality public spaces promote a sense of community and increase the variety of options to interact with the local environment and improve physical and mental health outcomes.

Both new and redesign of existing developments should consider a variety of needs of the Norfolk population. These could include:

- Recognising that greatest health benefits across the population are to be had by encouraging the inactive to be moderately active so build short active journeys in everyday life such as shopping, schooling, catching a bus and work
- Considering the particular needs of an ageing population when designing open space, access to public transport and physically active means of getting about. For example, siting of

⁶³ The King’s Fund: Future Trends, Demography, Ageing Populations

⁶⁴ British Heart Foundation, 2013: Economic costs of physical inactivity.

⁶⁵ Source: Guidance Health Matters: obesity and the food environment March 2017 (Public Health England)

benches and shelters, availability of toilets, safety when sharing pathways, level terrain and the provision of adult outdoor exercise equipment.

- It is important when designing built environments and making blue and green space more widely available that signage, navigation and layout actively consider needs of those, for example, with dementia or learning disabilities who may otherwise find some designs less accessible
- A number of these considerations may also support their use by, for example, adults with younger children, the less mobile across all age groups and those with a sensory disability
- Signage to facilities could be expressed in time taken to walk, for example, instead of distance and routes designed to break up longer journeys into manageable sizes
- Location of housing, employment, education and retail facilities to minimise journeys by non-private vehicle methods
- Where possible cycle lanes and footpaths should be situated away from busy roads, publicised and well sign posted to encourage use. They can provide opportunities for biodiversity enhancement by planting appropriate tree species, hedgerows and pollen and nectar rich flora, facilitating species movement and habitat connectivity.

The RTPI published Enabling Healthy Placemaking⁶⁶ which highlights the barriers to building healthy places⁶⁷ called for 'greater ...collaboration between health, social care, and planning professionals to ensure people's health needs are integrated into the conceptualisation, design and planning stages of new developments in the future'. It highlights 7 ways planners can take the lead:



⁶⁶ [Enabling Healthy Placemaking - https://www.rtpi.org.uk/media/5777/enabling-healthy-placemaking.pdf](https://www.rtpi.org.uk/media/5777/enabling-healthy-placemaking.pdf)
published July 2020

⁶⁷ Such as lack of funding; different requirements from developers; conflicting policy priorities.

7.4 Implementing Healthy Design

The NPPF states that local planning authorities should make use of tools and processes for assessing and improving the design of development, specifically recommending assessment frameworks such as Building for Life 12 (recently updated to Building for a Healthier Life⁶⁸).

[Building for a Healthier Life](#) replaced Building for Life 12 in July 2020; published in collaboration with NHS England, NHS Improvement and Homes England. 'Building for a Healthier life' is a Design Code to help people to improve the design of new and growing neighbourhoods and has been created for community, developer and local authority use. The 12 considerations capture areas of design and placemaking that need most attention but are often the most overlooked⁶⁹. It provides visual prompts to good practice rather than the previous 12 question approach.

The [Healthy Streets Approach](#) is a framework that emphasises a street that works for people and is a street that is good for health. It provides an evidence-based approach for creating fairer, sustainable attractive urban spaces. The Department for Transport has funded Healthy Streets Approach training for Local Authorities (including Norfolk) using Local Cycling and Walking Infrastructure Plans. The 10 indicators focus on the experience of people using streets and complements the use of the Building for a Healthier Life design code.

10 Healthy Street Indicators™



Source: Lucy Saunders

⁶⁸ NPPF revised Feb 2019, para 129.

⁶⁹ Building for a Healthier Life, pg 5.

7.5 Health Infrastructure Protocol

To help ensure these issues are addressed a protocol for joint working between planning, public health and health sector organisations was agreed in 2017 and has been revised to take account of the emergence of the NHS Sustainability and Transformation Partnership (STP). Throughout this revision support has come from several quarters, including each of the Norfolk and Waveney Clinical Commissioning Group (CCGs). The Protocol seeks to explain the relationship of land-use planning to public health, giving an overview of the planning system to health professionals and an overview of health service commissioning structures to land-use planners. There are mutual commitments to discuss development-related pressures on healthcare services and opportunities for high-quality place-making to enable people to make healthier lifestyle choices. The protocol also provides a single point of contact for local planning authorities within the healthcare system for feedback on planning applications and general advice. Working with STP colleagues affords an opportunity for long term planning and growth to be considered alongside health infrastructure needs.

The Protocol seeks for health professionals and town planners to work together to secure new healthcare facilities required as a result of development. To assist with such negotiations modelling data has been used to give an indication of future healthcare requirements for Norfolk. Based on each CCG area, projections are given on future demand for acute hospital beds, intermediate care beds, and the numbers of General Practitioners required. The population increases are modelled on low, medium and high scenarios for house-building rates, reflecting the uncertainty as to how economic conditions might affect the house-building industry in coming years. The Protocol also includes a *Health Planning Checklist* that consists of six place-making themes. Whilst use of the Checklist is not mandatory; it is simply made available to all practitioners as a convenient method to appraise development schemes in advance of, or at the point of, making a planning application. Additionally there is agreement that within the GNLP area all developments in excess of 500 homes should use a Health Impact assessment. HIA use is to be actively encouraged to tackle health inequalities and the promotion of good health across all areas alongside wider use of both HIAs and the checklist to actively consider designing in health benefits.

The Protocol should be reviewed by the middle of 2022 to take into account the specific health issues in the county; any changes required in the duty to co-operate and other changes currently drafted within the Planning White Paper.

Agreement 18 - Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.

Section 8 – Climate Change

8.1 Introduction

In Summer 2019 the Norfolk Strategic Planning Member Forum requested that a Climate Change sub group should be set up as part of the update process to the Norfolk Strategic Planning Framework. The group would review information in relation to Climate Change with a specific focus on the role and impact on Local Plans and the planning system generally. It would also explore some of the emerging policy work around climate change, and looks at best practice where applicable..

8.2 Background

Climate change has been embedded into Land Use Planning for many years, significant emphasis is placed on planners to address climate change through achieving sustainable development. It is recognised that considerable national, international and local research in relation to climate change has been completed in recent years. This includes reports by the Intergovernmental Panel on Climate Change, and there continues to be emerging changes in relation to Government policy on the matter.

In June 2019 the government amended the Climate Change Act 2008 to extend the national carbon reduction target within it with the aim to reduce carbon levels to net zero by 2050. In December 2020 the government also announced a new plan which aims for at least a 68% reduction in greenhouse gas emissions by the end of the decade, compared to 1990 levels⁷⁰. Many local authorities were galvanised to either declare climate emergencies, and/or set their own locally applicable targets, either replicating the governments or extending it further as well as enshrining the concept into corporate objectives and Plans.

Within Planning, Local Plans can play a central role in helping to facilitate this key national environmental objective. Effective strategic plan making can deliver sustainable development and help address the challenges that climate change brings, complementing measures outside of the planning sphere but not resolving climate change challenges on its own. Clearly the County is vulnerable to the impacts of climate change through flooding, drought, storm surges, sea rise etc. The costs of climate change are projected nationally to be high and it is emphasised that not taking action could cost more than taking steps to reducing emissions now to avoid the worst impacts of climate change. Sustainable development through land use policies is regarded as a key means of addressing climate change and as such the planning system has a duty to ensure that action is taken to encourage and deliver more sustainable development.

⁷⁰ See [Press Release - https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit](https://www.gov.uk/government/news/uk-sets-ambitious-new-climate-target-ahead-of-un-summit)

8.3 Climate Change Next Steps

Working collaboratively through the Norfolk Strategic Planning Member Forum, Local Planning Authority planning officers, along with colleagues from the Environment Agency, Local Enterprise Partnership and Norfolk County Council, worked together to develop ideas which could help local plans address climate change through land use policies at a strategic level. The group have produced a Climate Change Research Paper and sub topic reports which set out a number of approaches for local authorities to consider when drafting local plans. In the light of this work the following agreement has been reached.

Agreement 19 - Norfolk Planning Authorities agree that climate change is an urgent, strategic cross boundary issue which will be addressed at the heart of Local Plans. To do this, the Authorities agree to consider to the approaches contained in the NSPF Climate Change research paper when the relevant policies are next being reviewed and updated as part of the Local Plan process and their appropriateness considered against local factors including viability of developments. Norfolk Planning Authorities agree to collectively review the latest evidence and advice on a regular basis and to update this research to ensure that the most appropriate actions are being undertaken to support climate change initiatives.

Furthermore the Planning White Paper strengthens the need for local design initiatives and the work of this climate change group has highlighted that design and best practice climate change guidance could help with both climate change and healthy living initiatives. As such there is a strong case for looking at a Norfolk Design Guide or Charter. It is suggested that the initial steps would be to investigate how this could best be achieved and to what level all authorities are willing to work to a single design guide. It is clear for this to succeed that external and community involvement would be required and we would also need to understand in more detail any proposed changes to the NPPF and legislation, and the existing intentions of each local planning authority with providing further guidance.

A further agreement sets out Local Planning Authorities commitment to investigate the production of a countywide Design Guide:

Agreement 20 – Norfolk Planning Authorities agree to work together to investigate the production of a county wide design guide and produce a brief for this work. This work will help facilitate climate change and healthy living initiatives across the county by providing high level principles

The design guide would meet the requirements of the National Design Guide and look at other country wide initiatives like Building for a healthy life. Mitigating for and adapting to climate change could be a key consideration of this guide. Individual Local Planning Authorities could still produce their own guide or they can be produced as part of neighbourhood plans.

Section 9 – Infrastructure and Environment

Strategic Infrastructure and Environmental Objectives

To realise the economic potential of Norfolk and its people by:

- strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure; and
- ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements to strengthen inward investment.
- strengthening Norfolk's place competitiveness through the delivery of well-planned balanced new developments providing access to a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.
- Recognising the role of our city centre and town centres as a focus for investment and enhancing the quality of life for residents.
- recognising that the long term conservation of Norfolk's natural environment and heritage is a key element of the county's competitiveness.

To reduce Norfolk's greenhouse gas emissions and improving air quality as well as reducing the impact on, exposure to, and effects of climate change by:

- locating development so as to reduce the need to travel;
- reducing unnecessary car use and supporting the roll out of new technologies (such as Electric Vehicles and alternative fuels eg hydrogen) and alternative methods of transport including public transport, walking and cycling;
- maximising the energy efficiency of development and promoting the use of renewable and low carbon energy sources; and
- managing and mitigating against the risks of adverse weather events, sea level rise and flooding by reducing the impacts on people, property and wildlife habitats.

Together these measures will help create healthier more sustainable communities.

To improve the quality of life and health for all the population of Norfolk by:

- promoting development and design which seeks to actively improve health, prevent ill health and tackle widespread health inequalities
- ensuring new development fulfils the principles of sustainable communities, providing a well-designed and locally distinctive living environment adequately supported by social and green infrastructure;
- promoting social cohesion by significantly improving the educational performance of our schools, enhancing the skills of the workforce and improving access to work, services and other facilities, especially for those who are disadvantaged;
- maintaining cultural diversity while addressing the distinctive needs of each part of the county;
- ensuring all our communities are able to access excellent sporting facilities, health services and opportunities for informal recreation;
- promoting regeneration and renewal of disadvantaged areas; and
- increasing community involvement in the development process at local level.

To improve and conserve Norfolk's rich and biodiverse environment by:

- ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast;
- protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements;
- maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land;
- minimising, where possible, development on the best and most versatile agricultural land; where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- protecting, maintaining and, enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development;
- providing a coherent connected network of accessible multi-functional greenspaces;
- reducing the demand for and use of water and other natural resources; and
- Protecting and enhancing water, air, soil and other natural resource quality where possible.

9.1 Introduction

Infrastructure and Environmental objectives have been considered together in the context of the Norfolk Strategic Planning Framework. The issues addressed are complex and multi-faceted and much of the work that has been completed on this subject by working closely with appropriate expert groups.

As is reflected in the introductory text in this framework and is recognised in the agreed vision and objectives the future economic and social prospects for the County cannot be divorced from issues of environmental protection and infrastructure provision. The quality of Norfolk's environment, both in terms of the countryside, it's historic City and the wide range of distinctive towns and villages it includes, give access to a quality of life which is one of the key selling points of the County and the retention and enhancement of which will be crucial to attracting the growth in highly productive economic sectors that is sought. Yet, as is also noted, Norfolk's infrastructure is comparatively under developed compared to many other parts of the wider South and East of England and will need significant enhancement if growth is to be delivered at the scale envisaged without compromising the quality of life and environment on offer.

It would appear that there is a growing recognition of the comparative under development of Norfolk's Infrastructure and a number of announcements have been made about funding of investment in key infrastructure enhancements, especially in relation to transport. These are detailed later in the document and it will be important to ensure timely implementation of these projects.

The Norfolk Strategic Infrastructure Delivery Plan⁷¹ (NSIDP) has been produced by the County Council working with all the local planning authorities and utility providers. It identifies strategic infrastructure requirements and provides an update on the delivery of a range of projects. The

⁷¹See [Norfolk Strategic Infrastructure Delivery Plan](https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies) - <https://www.norfolk.gov.uk/what-we-do-and-how-we-work/policy-performance-and-partnerships/policies-and-strategies/business-policies>

projects in the NSIDP reflect the key infrastructure needed to deliver the scale of growth ambitions outlined in the NSPF. The NSIDP is a working document that will be regularly updated as information becomes available. A new version of the NSIDP was released in November 2020. The IDP will help co-ordination, implementation, prioritise activity and respond to any funding opportunities. It will also enable Local Authorities to prioritise the release of revenue funding for the development of scheme information to assist the prospects of successful bids being made for capital funding to deliver further projects. As it concentrates on strategic infrastructure it does not identify the full range of infrastructure required for development.

9.2 Utilities

To deliver the rate of growth that is planned across Norfolk in the coming years considerable further investment will be needed in utilities infrastructure. A list of the main schemes that are thought to be necessary is outlined below.

Table 11: Priority Utilities Projects for Promotion⁷²

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Attleborough Energy Supply	Not Known	£22m	BRP, NALEP, Private Sector
Broadland Growth Triangle Trunk Sewer	Delivery 2011-2026	TBC	Private sector
Sprowston Primary substation	Not Known	£2.5-10m	Community Infrastructure Levy and private sector
Peachman Way Primary Substation	Not Known	£2.5-10m	Community Infrastructure Levy and private sector
Snetterton Heath Energy Supply Long term Requirements	Not Known	TBC	NALEP, Private Sector, BRP
Thetford energy supply (Sustainable Urban Extension)	2021	£6.5m-£9.5m	BRP, NALEP
Thetford energy supply (Thetford Enterprise Park) Phase 1	Not Known	£3m	BRP, NALEP
Thetford energy supply (Thetford Enterprise Park) Phase 2	Not Known	£6.5m	BRP, NALEP
Earlham Substation	Not Known	£2.5-10m	Community Infrastructure Levy and private sector
Cringleford Primary Substation	Not Known	£2.5-10m	Community Infrastructure Levy and private sector

⁷² Anglian Water's Long Term Recycling Plan was published in the summer of 2018. Building on this version work has commenced on the drainage and wastewater managements plans, using a nationally agreed methodology, this will be published in 2022.

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Wymondham water supply connections	Not Known	£22m	Private sector
King's Lynn Sewerage improvements	Not Known	£1.5-1.7m	Community Infrastructure Levy and private sector

The following utilities project have successfully been funded since 2013:

Under construction or part-completed:

- Snetterton Energy Supply - £3.6m
- Thetford Water Supply – £9.8m
- Thetford Sewerage Scheme - £2m
- Easton, Hethersett and Cringleford sewerage upgrade - £11m

Planned, not yet started:

- Increased Surface Water Capacity North Lynn
- Snetterton Energy Supply Short term power needs £6.1m

9.3 Electricity

Provision of energy, particularly electricity is fundamental to housing and economic growth as energy consumers require access to reliable energy supplies. Since 2004, the UK have been a net importer of energy, and this has changed the way we view our energy security (Annual Energy Statement 2014). Housing and employment growth will put a greater strain on the electricity network with many of the primary substations in Norfolk already reaching capacity.

The 33kV main transmission network in Norfolk is the main network for new on-shore electricity providers and major users such as employment sites and large scale residential development. It is essentially three networks with one in the west serving King's Lynn and West Norfolk and extending in a limited way into the western side of North Norfolk and Breckland; one centred in Norwich and extending to Attleborough and the central and eastern parts of North Norfolk; and one serving the towns along the southern border and extending round to Great Yarmouth. This leaves significant, largely rural, parts of the county some distance from potential connections to this network. This particularly applies to a central swathe running north south, and a southern swathe running east west.

The electricity network is subject to a number of operational constraints which challenge the ability to predict the future capacity of substations over the time periods that are typical for Local Plans. UK Power Networks (UKPN) will not normally invest to provide additional unassigned capacity and the costs of capacity upgrades falling on developers can be significant. The ability of developers to reserve supply, and unexpected windfall development adds further uncertainty to the forward planning process. In addition, the power requirements of end users of employment sites can vary significantly and are unknown at the time the land is allocated in a Local Plan.

In developing Local Plans it is clear that Local Authorities will need to work closely with UKPN to ensure that identified locations where housing and employment growth will require strategic

enhancement of the electricity supply networks to support new developments can be delivered without delaying the delivery of development or rendering it unviable. Partners continue to work with UKPN to overcome current constraints and prevent future issues, and to explore mechanisms to ensure the cost of electricity infrastructure is shared proportionately between planned developments. To support this partners are working with UKPN to ensure there is more detailed information available to authorities providing an understanding of potential constraints and where development will require strategic enhancement of the electricity supply networks. Some Norfolk Planning authorities have also completed electricity infrastructure studies to investigate power supply issues and assess local constraints in more detail, these include the Greater Norwich Energy Infrastructure Study⁷³ and the North Norfolk Power Study⁷⁴.

Additionally all Local Plans across Norfolk will need to promote new developments which minimises energy use; minimise reliance on non-renewable or high-carbon energy sources and promote and encourage the use of decentralised and renewable or low-carbon energy sources and sustainable construction technologies ensure that investment decisions help promote growth and overcome constraints and there are forward looking decision on energy investment.

9.4 Water

Norfolk lies within one of the driest parts of the UK. Planned growth in housing and employment will significantly increase water demand. The area's large agricultural sector is also dependent on water availability in the summer. Water quality is crucial, due to the number of protected sites relying on high water quality, including the Broads.

Anglian Water supplies water to the majority of Norfolk County with parts of Great Yarmouth and the Broads Authority being served by Essex and Suffolk Water. Water companies have a statutory obligation to prepare and review Water Resource Management Plans (WRMP) once every 5 years setting how they will maintain a sustainable balance between water supplies and demand.

Anglian Water's Current Water Resources Management Plan (WRMP) was published in 2019 and runs to 2045⁷⁵. This is currently under review in parallel to Water Resources East (WRE's) Regional Strategy. This demonstrates how sufficient water for future growth will be provided via a twin-track approach. Anglian Water will focus on the demand side first and reduce the amount of water used by installing smart meters, reducing leakage and investing in water efficiency. But they will also invest in the supply-side to increase the amount of water available. This includes investing in a series of interconnecting pipes to better join up their network and ensure they make best use of available resources before developing new ones. In the medium- to long-term, Anglian Water are likely to need additional resources. This could include winter storage, recirculation of recycled water, or

⁷³ See [Greater Norwich Energy Infrastructure Study - https://gnlp.oc2.uk/docfiles/46/P3723%20Greater%20Norwich%20Energy%20Infrastructure%20Study%20with%20Appendices.pdf](https://gnlp.oc2.uk/docfiles/46/P3723%20Greater%20Norwich%20Energy%20Infrastructure%20Study%20with%20Appendices.pdf)

⁷⁴ See [North Norfolk Power Study - https://www.north-norfolk.gov.uk/media/5583/north-norfolk-power-study-report-march-2019.pdf](https://www.north-norfolk.gov.uk/media/5583/north-norfolk-power-study-report-march-2019.pdf)

⁷⁵ See [Water Resources Management Plan - https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/wrmp-report-2019.pdf)

desalination. Anglian Water will be working with regional stakeholders and neighbouring water companies through Water Resources East (WRE) over the next two to three years to identify the best options to take forward to WRMP 2024. The measures undertaken by AW mean that water supply should not be a strategic constraint to development. Essex and Suffolk Water also have a WRMP⁷⁶ for the same period covering the areas of Norfolk they supply.

Norfolk Authorities will work with Water Resources East (WRE) and its members, including the two water companies, to help safeguard a sustainable supply of water for Eastern England, resilient to future challenges and enabling the area's communities, environment and economy to reach their full potential.

In the period through to September 2023, WRE will develop a draft single, multi-sector Regional Plan for Eastern England, working with water companies, Local Authorities and Local Enterprise Partnerships, the energy and agricultural sectors, landowners and key environmental NGOs and through co-creation, engagement and collective decision making, the plan, and its subsequent iterations, will:

- Increase the level of resilience for water resources for all sectors and the environment.
- Deliver wider benefits in terms of flood risk, river flows and water quality.
- Ensure that water (either too much or not enough) is not a barrier to economic development in the region.
- Identify opportunities and delivery mechanisms to restore and enhance the environment, in line with the biodiversity net gain and wider aspirations of the 25 Year Environment Plan.
- Explore innovative funding and delivery models for water management solutions.
- Promote schemes which represent the best value for the region, seeking through collaboration to deliver more efficient solutions.
- Co-deliver the water related elements of other key regional strategies and plans,
- Focus on delivery of water-related climate change mitigation and adaptation strategies including net zero carbon ambition.
- Provide academically rigorous evidence to policy makers.

As part of WRE's work programme, with the support of councils, the Norfolk Strategic Fund have provided a grant to WRE for the development of a Water Management Strategy for the county. This project will develop short term water-related Covid-19 recovery interventions, the detailed Water Management Strategy and Plan and will establish a partnership structure known as a "Water Fund" to facilitate delivery of nature-based solutions for water management in the medium and long term. This project will be supported by a partnership of Norfolk County Council and [Water Resources East](#), the international environmental charity [The Nature Conservancy](#) (TNC) and Anglian Water.

Water Funds are governance and financing mechanisms allowing public and private sectors to work collectively to secure water for their communities. They are used successfully around the world to leverage blended finance streams to ensure coordinated delivery, funding and monitoring of nature-

⁷⁶ See [Essex and Suffolk Water: Water Resources Management Plan -
https://www.nwg.co.uk/globalassets/corporate/reports/esw-final-wrmp19.pdf](https://www.nwg.co.uk/globalassets/corporate/reports/esw-final-wrmp19.pdf)

based solutions (NBS) for water security. In 40 locations, across North America, Latin America, Asia and Africa, TNC collaborates with partners to set up Water Funds based on science-based plans and innovative tools for representing water management challenges, strong monitoring and mobilisation of diverse funding streams. This programme will establish TNC's first Water Fund in Europe. Being part of the global Water Fund network will access collective experience, accelerating the project, and enable Norfolk to be featured as a global exemplar for water resource management, thereby facilitating access to further financial and human resources.

The project will create a new multi-stakeholder governance structure which will include representatives from councils, New Anglia LEP, water companies, environmental organisations and the agri-food and energy sectors. This governance structure will be set up in 2 stages:

- a Water Management Board to generate consensus across all local actors for the preparation of a prioritised plan;
- a more permanent structure (a Water Fund) to: supervise and coordinate implementation of the plan, monitor results, enable mobilisation of funding and repayable financing from public and private sources

Progress with the project will be regularly reported to councils across the county.

Agreement 21– Norfolk Authorities have agreed to become members of WRE, and to work collaboratively with its other members in the development of the Norfolk Water Strategy to ensure the project delivers the best outcomes for the county. Norfolk Authorities will also work collaboratively as part of WRE to enable the successful co-creation of WRE's wider Regional Plan.

Other work is also ongoing across the county considering the wider impacts of water and associated infrastructure. Norwich City Council leads the River Wensum Strategy Partnership, working alongside the Environment Agency, Norfolk County Council, the Broads Authority and Norwich Society. The strategy has the overall vision of breathing new life into the river by enhancing it for the benefit of all and increasing access to, and making greater use of, this important asset. It will consider social, environmental and economic factors in achieving this vision. Some of the projects already delivered or planned as part of this strategy look to improve water quality and reduce flood risk on a catchment wide basis. In addition, the CATCH project, (Norfolk County Council along with Norwich City Council, Broadland District Council and Anglian Water) is working to find long-term solutions to the problem of surface water flooding in Norwich. The pilot project offers homes, businesses and schools the chance to have a slow-release water butts or rain water planters installed completely free of charge. The project is funded by Anglian Water and the Interreg European Union CATCH Climate Change and Flood Reduction Project. The EU are currently considering further phases of project work.

Local Plans can also contribute to long term water resilience by ensuring that new development incorporates water efficiency measures including the adoption of the optional higher water efficiency standard (110 litres/per person/per day).

Agreement 22 – Norfolk is identified as an area of serious water stress, the Norfolk Planning Authorities have agreed that when preparing Local Plans to seek to include the optional higher water efficiency standard (110 litres/per person/per day) for residential development.

Individual authorities may also wish to consider the inclusion of a specific water efficiency BREEAM standard for commercial development within their Local Plans. Improved water efficiency is not limited to measures within dwellings and commercial buildings and a collaborative approach to promote innovation in water efficiency/re-use is required working closely with water companies and site promoters/developers.

Anglian Water's aim is to see residential developers go beyond the optional higher water efficiency standard (110 litres/per person/per day) and in time to move to water neutrality as outlined in their Green Recovery Plan⁷⁷ this could include water re-use measures in new developments including stormwater and rainwater harvesting and grey water recycling forming part of an integrated approach to water management.

The disposal of waste water is addressed by Anglian Water's Water Recycling Long-Term Plan (WRLTP)⁷⁸ which highlights the investment needed over the next 25-years to balance the supply and demand for water recycling. The plan considers risk from growth, climate change, severe drought, and customer behaviours. It promotes sustainable solutions for maintaining reliable and affordable levels of service, and facilitates working in partnership to mitigate flood risk. Developing on the WRLTP Anglian Water are preparing a Drainage and Wastewater Management Plan with Stakeholders to be published in 2022⁷⁹ Anglian Water has also implemented new charging rules setting out a fixed, upfront schedule of fees that they charge for laying mains and pipes that connect new buildings and housing developments to their network⁸⁰. This is a significant step towards ensuring that water companies provide an excellent service to developers of all sizes.

It will be necessary to take a co-ordinated approach to water through water cycle studies to address water supply, quality, waste water treatment and flood risk. Flood risk assessments should be used effectively to ensure development is located appropriately, to help achieve this a Strategic Flood Risk Assessment (SFRA) has been produced jointly by most Norfolk authorities⁸¹.

The release of land for development will be dependent on there being sufficient water infrastructure to meet the additional requirements arising from the new development to ensure that water quality is protected or improved, with no detriment to areas of environmental importance. Growth in several parts of the county is dependent on investment at sewage treatment works. The timing of these investments will have an important effect on the phasing of development.

⁷⁷ See [Green Recovery Plan - https://www.anglianwater.co.uk/siteassets/household/about-us/green-recovery-five-point-plan.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/green-recovery-five-point-plan.pdf)

⁷⁸ See [Water recycling long term plan - https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-recycling-long-term-plan/](https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/water-recycling-long-term-plan/)

⁷⁹ See [Drainage and Wastewater Management Plan - https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-and-wastewater-management-plan/](https://www.anglianwater.co.uk/about-us/our-strategies-and-plans/drainage-and-wastewater-management-plan/)

⁸⁰ See [DS charging arrangements - https://www.anglianwater.co.uk/siteassets/developers/development-services/ds-charging-arrangements-2019-2020.pdf](https://www.anglianwater.co.uk/siteassets/developers/development-services/ds-charging-arrangements-2019-2020.pdf)

⁸¹ See [Strategic flood risk assessment - http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra](http://www.broads-authority.gov.uk/planning/planning-policies/sfra/sfra)

Agreement 23 – The Norfolk Authorities, Anglian Water and Essex and Suffolk Water have agreed to provide regular and timely updates to each other on the delivery of development sites and proposed utility projects to ensure that development is aligned with water and wastewater infrastructure. LPAs will produce Habitat Regulation Assessments, as required, that will also consider impact of development on sensitive sites.

In considering the distribution of growth Local Planning Authorities will need to ensure that distribution avoids cumulative detrimental impact on the most sensitive water courses particularly, those in the Broads and on the Wensum which cross a number of Local Planning Authority boundaries. Each public body will have regard to River Basin Management Plan⁸² to ensure that their plans and actions do not risk delivery of the environmental objectives for each water body in the County (not just protected sites).

9.5 Digital Connectivity

Broadband

Having access to high-speed and reliable broadband is now regarded as essential by many residents and businesses. The picture regarding superfast broadband coverage is rapidly improving; 95% of the county's homes and businesses can now access superfast broadband, up from 42% in 2012⁸³.

The Better Broadband for Norfolk (BBfN) project was launched in 2012, with the aim of ensuring that by the end of 2015 more than 80% of Norfolk's premises could access superfast broadband (24 Mbps download, also known as Next Generation Access (NGA)). The BBfN Programme signed a third contract during 2019; as a result a further £13 million will be invested to implement Fibre to the Premises for over 10,000 Norfolk properties that do not have access to Superfast broadband. As a result, by spring 2023, Superfast broadband coverage across Norfolk is expected to increase to 97%.

In order to extend the provision of superfast broadband further, additional funding would be needed. Where this is not possible or feasible, wireless (Wi-Fi) solutions can be investigated as well as satellite broadband, although it is recognised that there will be many parts of the county where these are not currently practicable.

In April 2016, changes to Building Regulations R1⁸⁴ were finalised. For applications made on or after 1 January 2017 new buildings are required to have physical infrastructure to support high-speed broadband (greater than 30Mbps). However, there is no requirement to provide external or site-wide infrastructure beyond the access point.

⁸² See [Anglian district river basin management plan - https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan](https://www.gov.uk/government/publications/anglian-district-river-basin-management-plan)

⁸³ See [Local broadband Information Website - http://labs.thinkbroadband.com/local/index.php?area=E10000020](http://labs.thinkbroadband.com/local/index.php?area=E10000020)

⁸⁴ See [Building Regulations R1 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/517789/BR_PDF_AD_R_2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/517789/BR_PDF_AD_R_2016.pdf)

The availability of high-speed broadband is clearly of major strategic significance for Norfolk and Norfolk authorities welcome Openreach's offer to install Fibre to the Premises (FTTP) free of charge to all new housing developments of 20 or more homes and an improved pricing structure all the way down to two homes⁸⁵. However the further rollout of broadband to existing homes cannot be required through any current Local Plan, but the Norfolk authorities are working closely with Better Broadband for Norfolk and other bodies and providers to ensure that high-speed broadband is delivered to more parts of the county as soon as is practicable.

Norfolk County Council in conjunction with all Norfolk districts, boroughs, Norwich city, the chamber of commerce, the LEP and other relevant regional groups has secured circa. £8 million in 2019 via the Government's Local Full Fibre Network programme and a further £2m in 2020 from Ministry of Housing, Communities and Local Government. This will provide Fibre to the Premises for over 400 public sector sites, and importantly also offers potential for nearby homes and businesses to access Full Fibre connectivity via a Government Gigabit Voucher Scheme.

The revised NPPF (para 112) highlights the importance of reliable communications infrastructure in economic growth and social well-being and requires policies to set out how high quality digital infrastructure is expected to be delivered, authorities will engage proactively with broadband and mobile network providers to better encourage the rollout of new infrastructure, particularly Openreach, and will seek to involve Openreach at the pre-application stage of major residential and commercial planning applications, as well as through consultations on the emerging Local Plans.

As part of the work to update this document a specialist group was set up to provide further guidance to local authorities on supporting broadband in local plans. Also, in March 2020 the Government published its response to the consultation⁸⁶ on: New Build Developments: delivering gigabit-capable **connections** which outlined Government's proposals to mandate gigabit-capable connections in all new build developments. Following publication of the response Government will:

- Amend the Building Regulations 2010 to require all new build developments to have the physical infrastructure to support gigabit-capable connections.
- Amend the Building Regulations 2010 to create a requirement on housing developers to work with network operators so that gigabit broadband is installed in new build developments, up to a cost cap.
- Publish supporting statutory guidance (Approved Documents) as soon as possible.
- Continue to work with network operators to ensure they are connecting as many new build developments as possible and at the lowest possible price.
- Work with housing developers and their representative bodies to raise awareness of these new requirements.

⁸⁵ See [Fibre for developers rate card](https://www.openreach.com/content/dam/openreach/openreach-dam-files/images/fibre-broadband/fibre-for-developers/Rate%20card%20website.pdf) - <https://www.openreach.com/content/dam/openreach/openreach-dam-files/images/fibre-broadband/fibre-for-developers/Rate%20card%20website.pdf>

⁸⁶ [New Build Developments: delivering gigabit-capable connections response](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872990/New_Build_Developments_HMG_consultation_response.pdf) - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/872990/New_Build_Developments_HMG_consultation_response.pdf

There are no further details on the timetable for the amended regulatory changes but in the meantime Local Planning Authorities can opt to encourage and support high speed broadband provision in new developments by incorporating objectives and policies to support Broadband in local plans and core strategies, as well as referencing the issue in pre-application discussions and adding it to planning application validation lists as a consideration. Local Planning authorities can also ensure they are able to support developers with information regarding the connection of Fibre to the Premises (FTTP) and discuss applications with the County Council to understand how their initiatives can help deliver high speed broadband provision to developments. Local planning authorities can implement Wayleave policies that only seek to cover costs and work with landowners to improve connectivity.

Agreement 24 - To support the high speed broadband provision in emerging Local Plans Norfolk Planning Authorities will consider the extent to which they could require high-speed broadband to be delivered as part of new developments and consider the promotion of Fibre to the Premises (FTTP) to smaller sites. Norfolk Planning Authorities will consider policies to require all residential developments over 10 dwellings and all employment developments to enable FTTP and strongly encourage FTTP on smaller sites.

Mobile Connectivity

Mobile telephone connectivity has, like broadband, become increasingly important. Significant change is now underway with the rollout of 5G services now having commenced in the County.

Coverage in Norfolk

Interactive mapping (available from Consumer Group Which⁸⁷) shows the general coverage for 2G, 3G 4G and 5G data across Norfolk. The majority of areas across Norfolk receive a weak 2/3/4G signal, with the strongest signals in Norwich and market towns such as King's Lynn and Great Yarmouth.

Norfolk County Council commissioned AWTG (Advanced Wireless Technology Group) to conduct an independent benchmark assessment of mobile coverage and user experience across Norfolk. The benchmarking campaign was conducted between February and March 2018 using a robust four-tier methodology to maximise the extent and breadth of data collection. This included Walk Testing at over 30 locations including museums, tourist attractions, camping and caravan sites, Rail Testing on all main rail routes in Norfolk, Drive Testing on over 5,500 kilometres of Trunk, A, B and C class roads across Norfolk and Stationary Testing at enterprise zones and 28 Norfolk Broads mooring points. The scope of the campaign covered a detailed assessment of the GSM (2G), UMTS (3G) and LTE (4G) radio network (coverage) performance and received signal strength of the four main mobile network operators in the UK. The results of this assessment can be found at [the Norfolk Mobile Coverage web page - www.norfolk.gov.uk/mobilemap](http://www.norfolk.gov.uk/mobilemap).

⁸⁷ [Which mobile phone coverage map - http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map](http://www.which.co.uk/reviews/mobile-phone-providers/article/mobile-phone-coverage-map)

Nevertheless many mobile “not-spots” remain in Norfolk (some rural areas and parts of the coast in particular), particularly for 4G data coverage, the most significant improvements in rural coverage will be delivered through the Shared Rural Network (SRN) programme. This Programme will see the four main mobile operators and government jointly invest £1bn in improving mobile coverage in rural areas. The target is to deliver 4G coverage to 95% of the UK by 2025. The work started in 2020, initially with £500m investment from the four MNOs to share masts in areas where there is coverage already available from one or more MNO, but not all four. The next stage will entail a further £500m investment from government to fund coverage improvements in areas where there is no existing coverage. Through shared and new infrastructure, the Shared Rural Network is planned to increase the parts of the UK that get 4G coverage from all operators from 66% to 84%, improving consumer choice. The mobile operators expect the Shared Rural Network will extend mobile coverage to an additional 280,000 premises and for people in cars on an additional 16,000km of the UK’s roads, boosting productivity and investment in rural areas. Norfolk local authorities will continue to work proactively and collaboratively with the MNOs and their network build partners to improve mobile phone coverage including fast data services availability over 4G & 5G services.

5G

The next generation of mobile networks will be 5G which will probably encompass the following:

- 60-100 times faster than 4G Instantaneous playback from downloading speeds and
- Sufficient bandwidth to enable a multitude of internet-connected devices to communicate effectively.

5G uses higher frequency radio bands which travel less well than 4G, and can be disturbed by buildings, trees, weather etc. Whilst more base stations will be required Mobile Network Operators will use Multi-Input and Multiple-Output (MIMO) technology which will be rolled out on existing infrastructure where possible. Getting high quality 5G infrastructure rolled out across Norfolk will be important to delivering the vision of the NSPF. The main benefit of 5G is that it could, in theory, provide ultra-high speed broadband access to all, without the bandwidth capacity challenges of 4G. This should enable location to be much less of a barrier to receiving broadband than previously, with benefits for homeowners and businesses. It could remove a barrier to location of employment opportunities, particularly home-based and rural-based businesses.

Norfolk authorities are currently working with Mobile UK and the mobile network operators to advance knowledge and plans to ensure that rural areas of Norfolk get 5G as early as possible.

On 22 July 2020 the Government published its response to the joint MHCLG and DCMS consultation published last year on proposed planning reforms to support the deployment of 5G and extend mobile coverage. This included the principle of amending permitted development rights for operators with rights under the Electronic Communications Code and the circumstances in which it would be appropriate to do so.

The government response summarises the submissions received and confirms its intention to take forward the in-principle proposals consulted on. This will be subject to a technical consultation with representatives from both the local planning authority and mobile industry sector, on the detail of the proposals, including for appropriate environmental protections and other safeguards to mitigate the impact of new mobile infrastructure.

This will be undertaken prior to amending Part 16 of Schedule 2 to the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) to enable:

- the deployment of taller and wider masts;
- building-based masts located nearer to highways; and
- faster deployment of radio equipment housing, such as equipment cabinets.

The key conclusion is that some consistency of approach from all Norfolk Planning Authorities is clearly important for 5G if the very high degree of nationwide coverage required for 5G to be effective is to be secured. Broadly, it should be made as straightforward as possible for 5G base stations and transmitters to be approved where they fall outside of the remit of permitted development, and common development management policy text to facilitate this should be explored, taking into account material planning considerations. In particular, care will need to be taken to ensure that new telecommunications equipment is sited and located sensitively in respect of the public realm, street-scene, historic environment and wider landscapes.

As part of the work to update this document a specialist group was set up to provide further guidance to local authorities on supporting the roll out of 5G. The group have produced a supporting document of Shared Objectives for extending 4G coverage and the rollout of 5G infrastructure in the County of Norfolk.

Agreement 25 - To maximise the speed of rollout of 5G telecommunications to Norfolk, Norfolk Planning Authorities will continue to engage with Mobile Network Operators and Mobile UK on their 5G rollout plans for Norfolk. When reviewing Local Plans and updating relevant policies, Local Planning Authorities agree to have regard to the shared objectives for extending 4G coverage and the rollout of 5G infrastructure in Norfolk produced by the technical group, taking into account material planning considerations.

9.6 Education

Education

Norfolk's School Capacity return to the DfE (SCAP) indicates that Norfolk's school population will begin to stabilise over the next 10 years. The larger cohorts experienced at primary school are now moving through to secondary indicating a rise in secondary numbers over the next 10 years but a drop in primary school numbers. Calculating a 10 year forecast for primary school numbers does come with certain caveats. The calculations are based on the past 3 years of children born, and therefore only produce three years of predicted future data. The 3 years from 2020 are smaller year groups than those from 5 years ago which may explain the predicted drop in primary school numbers.

Primary age population including the influence of housing planned will drop by around 7.2% and secondary will rise by 4.2% (children currently in the school system including the additional 4% covered by growth). The impact of housing included in these figures is based purely on housing with full planning permission and some areas of the County have significant growth planned. Once these new homes come forward the figures are likely to change.

Previously reported increases in the school population at reception age are changing but numbers have been stable over the past 3 years at around 9000 per year group. Secondary school numbers at year 7 are increasing with the higher year groups currently in primary moving through to secondary. The speed of delivering houses is key to the requirements of school places so careful monitoring of housing progress is undertaken between County Council/District/Borough Councils.

Standards in Norfolk schools have risen considerably over the past 5 years with 83% of schools being graded Good or Outstanding in 2020 compared with 68% 7 years ago – data as at September 2020. The Local Authority retains responsibility for ensuring that there is a sufficient supply of school places and works with a range of partners, e.g. Dioceses and Academy Trusts to develop local schemes.

Norfolk County Council's School Growth and Investment Plan, published every January identifies three growth areas requiring more than one new primary phase school and a further 10 areas requiring one new school. Expansion to existing schools will also be required in some areas of the County. A new High School for north east Norwich is also being discussed and planned.

Our strategic priorities were agreed by NCC Cabinet in February 2020 to guide the work with local partners and any proposals for investment in the education infrastructure. Norfolk County Council works closely with Local Planning authorities as per agreement 21.

Agreement 26: Norfolk Planning authorities will continue to work closely with the County Council and school providers to ensure a sufficient supply of school places and land for school expansion or new schools, and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate. The authorities agree to continue supporting the implementation of the County Council's Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure.

9.7 Transportation

There will be a need for considerable further investment in transport infrastructure if this is not to constrain growth. A background paper was previously produced summarising the state of the County's transport network, providing much of the evidence base for the production of the first version of the NSPF and subsequent Local Plans⁸⁸. The paper aims to identify: the current state of the transport system; the constraints (current and future); and opportunities and includes a review of transport constraints to identify issues that, without resolution, may prove a barrier to growth. The information is now being updated via the Norfolk Strategic Infrastructure Delivery Plan as mentioned in Section 9.1.

Current Network

Norfolk is served by two trunk roads: the A11 from London and Cambridge, and the A47 from the west. The A47 continues from Great Yarmouth to Lowestoft. The A11 is fully dual carriageway and the corridor will see some of the largest scale growth planned in the county (at Thetford, Attleborough, Wymondham, Hethersett and the Norwich fringe at Colney/Cringleford). The A47 is a mix of single and dual carriageway, both within and beyond Norfolk.

Away from the strategic road network, Norfolk's road network is a largely rural, single carriageway network. Much of it has not seen significant improvement schemes and so journey times can be slow, particularly away from the higher standard A-class network.

The following projects have successfully been funded since 2013

Completed:

- Broadland Northway (Norwich Northern Distributor Road (inc Postwick)) - £205m
- Norwich Pedal ways - £14m
- Great Yarmouth Beacon Park Link (A47/143 Link) - £6.8m
- A11 dualling Barton Mills to Thetford- £105m
- Great Yarmouth Right Turn at the rail station - £400,000
- Great Yarmouth Rail Station to the Market Place improvement- £2m
- Great Yarmouth sustainable transport package (Part 1) - £2.5m
- Thetford Enterprise Park Roundabout- £1.5m
- King's Lynn Lynnsport Link Road- £3.5m
- A140 Hempsall Roundabout - £4m
- A11/Outer Ring Road Daniels Road junction improvement- £2m
- Great Yarmouth congestion-busting projects- £3.3m
- Norwich (various projects including Dereham Road roundabout- £2m, Cycle link extension to Wymondham- £1.3m, City centre Prince of Wales Road- £2.6m, Dereham Road widening- £3m)

Under construction or part-completed:

- Attleborough Town Centre Improvements - £4.5m
- Great Yarmouth sustainable transport package (Part 2) - £3.5m

⁸⁸ See [NSPF Supporting Transport Information - https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/NSFTTransport_OutputV4.docx](https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework/supporting_documents/NSFTTransport_OutputV4.docx)

Planned, not yet started:

- Great Yarmouth Third River Crossing- £120m
- A47 improvements £2-300m (incl Thickthorn and Great Yarmouth junction improvements and dualling Blofield to North Burlingham, and Easton to North Tuddenham)

Norfolk County Council, in partnership with Norwich City Council, Broadland District Council and South Norfolk Council, has made an application to the Department for Transport (DfT) as part of the Transforming Cities Fund. The fund aims to make it easier for people to access jobs, training and retail, and also aims to respond to issues around air quality. In September 2018, Greater Norwich was one of 10 city areas shortlisted to apply for a share of the £840m grant. In September 2020 the DfT confirmed that Norfolk County Council will receive £32 million from the Transforming Cities Fund with a further £27m from bus operator First Eastern Counties, local councils and private contributions⁸⁹.

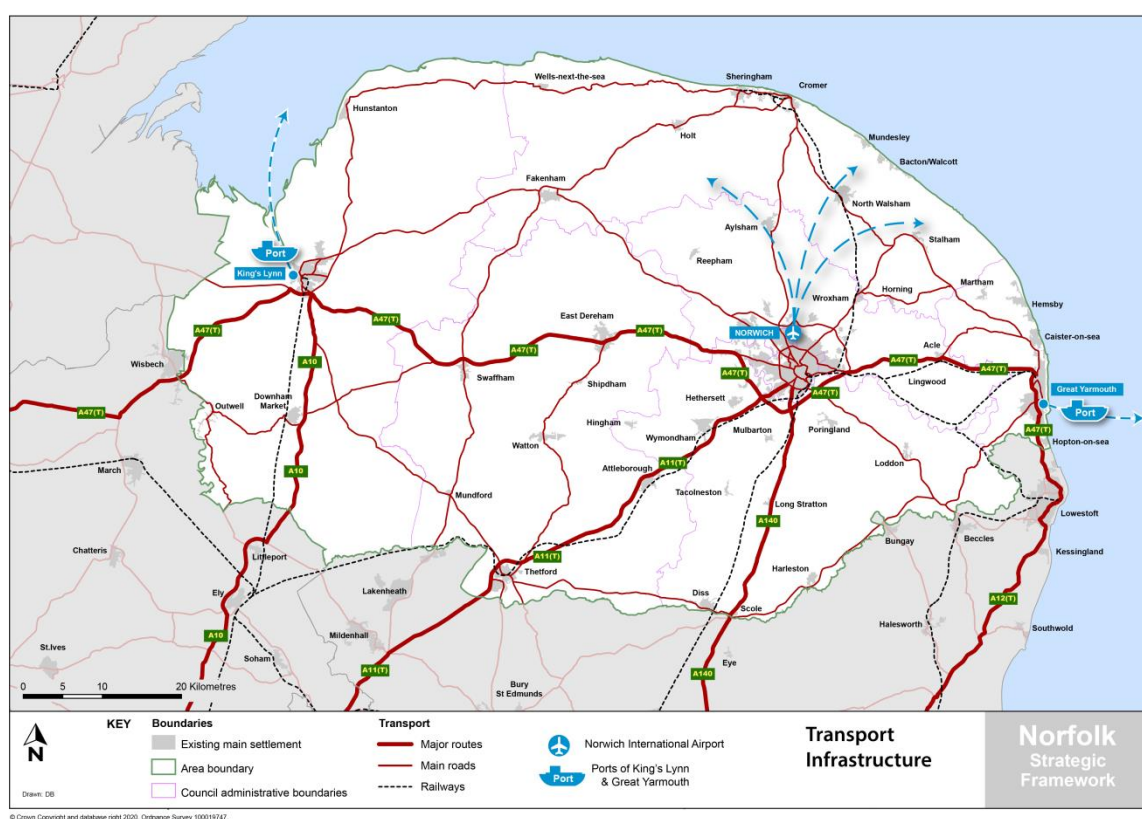


Figure 9: Norfolk Transport Infrastructure, 2021

Norwich Airport is situated some 5km north of Norwich city centre. It operates a number of scheduled and charter flights and provides servicing for the offshore energy industries via helicopter flights. The airport terminal has capacity for 700,000 passengers per year. In 2017 the airport published its draft masterplan setting out a vision for the airport's continued growth over the next

⁸⁹See [Councils secure £59 million for sustainable transport - https://www.norfolk.gov.uk/news/2020/09/councils-secure-59-million-for-sustainable-transport](https://www.norfolk.gov.uk/news/2020/09/councils-secure-59-million-for-sustainable-transport)

30 years. The masterplan has been adopted and endorsed by Norwich City Council subject to production of a surface access strategy. Continued endorsement is subject to the surface access strategy being produced however this has been delayed due to covid-19.⁹⁰ The Coronavirus has had a significant impact on air travel however the long term impacts remains unclear, the relevant Local Authorities will work with the airport to support any recovery plans once these are understood.

Great Yarmouth is the largest port in the county. It is a modern, multipurpose facility with 24/7 unrestricted operations, integrating a well-established river port with a fully operational deep water outer harbour with more than 1 km of quayside, accepting vessels up to 220 metres in length and up to 10.5 metres draught at all states of tide.

Levels of both walking and cycling to work are relatively high in Norwich. In South Norfolk and Broadland Districts levels of walking are comparatively lower than elsewhere in the county, probably reflecting that many people from these districts work in Norwich and many parts of these districts are too far from Norwich to walk. A comprehensive cycle network has been identified in Norwich, and the city has also benefited from a large amount of funding that has been used to upgrade parts of the cycle network. There is still however a considerable amount of work required to upgrade the network in its entirety.

Accessibility by public transport to services and facilities is problematic in some more rural and isolated parts of Norfolk. Overall, accessibility tends to be poorest in the more rural districts of Breckland and West Norfolk, where there is a significant number of smaller villages, hamlets and isolated dwellings. Providing bus services within these smaller settlements is often unviable due to low population numbers.

Tables below lists some of the key road projects that the County Council in collaboration with partners is seeking to progress in the next 10 years.

Table 12: Key Infrastructure Road Projects in Local Authority Control

Project Name	Estimated Start date	Estimated Cost	Funding sources
Broadland Growth Triangle Link Road	2023	£38m	Developer funding, CIL, BRP, HIF
A140 Long Stratton Bypass	2023	£37.5m	Developer funding, NALEP, CIL, NPIF, Government Major Road Network
A10 West Winch Housing Access Road	2024	£30-50m	Developer funding, DfT Major Road Network
A148 Fakenham Roundabout Enhancement	2022	£3.5m	NPIF, NALEP
Attleborough Link Road	TBC	£18m	BRP, developer finance, NALEP, Homes England loan, HIF
Norwich Western Link (A47 to NDR)	2023	Indicative £160m	NALEP, Local Major Transport Scheme

⁹⁰ See [Norwich Airport Masterplan - http://www.norwichairport.co.uk/masterplan/](http://www.norwichairport.co.uk/masterplan/)

Table 13: Priority Road Projects for delivery by other organisations

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
A11 Thetford bypass junctions	2020-2025	Not Known	NPIF, Highways England Roads Investment Strategy 3 (2025-2030), Major Road Network Funding
A47 Wisbech Bypass Junctions	2020	Not Known	NPIF, developer funding, Highways England Roads Investment Strategy 2 (2020-2025), CPCA Business Board Growth Deal Funding
A47 Acle Straight dualling	2025-2030	£79m	Highways England Roads Investment Strategy 3 (2025-2030)
A47 Tilney to East Winch Dualling	2025-2030	£130m	Highways England Roads Investment Strategy 3 (2025-2030)

Timely delivery of the above list of commitments will doubtless serve to stimulate the local economy and enhance the prospects of delivery of planned growth. Whilst the growing recognition of the need for further development of Norfolk's infrastructure is very welcome because of its contribution to the delivery of the objectives of the NSPF there remains a considerable need for further infrastructure investment in the County if the vision in this framework is to be realised.

Furthermore, the background paper previously produced identified three key strategic issues affecting the County including: the relatively poor transport connectivity between our main settlements and destinations outside Norfolk resulting in long journey times; the poor connectivity within the County particularly for east-west journeys, exacerbated by congestion and unreliable journey times on parts of the network (especially the A47) adding to business costs; and difficulties in delivering major enhancements to transport networks within our urban areas and market towns which tend to have historical street patterns where the scope for major improvements is limited.

It should also be noted that the area of transport is considered to be an area where new technology may have a particularly significant impact during the duration of this framework and this makes predicting the full range of enhancements to travel networks difficult at this stage.

It is clear that providing suitable transport provision to meet the needs of existing and future populations while reducing travel need and impact will be one of the greatest challenges faced by Norfolk in delivering the level of growth that is anticipated over the coming decades. Given the overall scale of growth that is planned across the County a key matter will be ensuring that transport is a significant consideration in locating this growth and development levels are maximised in areas that are best served by transport networks and have the greatest potential for promoting the use of non-car based modes.

Rail

Norfolk has a limited rail network, meaning that many of its towns are not served by rail. Also, the services offered provide a very limited range of destinations and frequencies. In particular, services to the Midlands and Home Counties are poor. Whilst rail generally provides faster journeys to other major centres compared to road, average rail speeds compare poorly with connections between major centres out of the County.

There are two lines from London: the Great Eastern Main Line from London Liverpool Street via Ipswich to Norwich; and the Fensline / Great Northern Route from London King's Cross via Cambridge to King's Lynn. (King's Lynn also has one train per day to London Liverpool Street). Norwich is directly connected to Cambridge, Great Yarmouth, Lowestoft and Sheringham; and longer distance services to Liverpool via Peterborough.

The tables below set out some key shared priority schemes for rail improvement that the authorities will work together to promote for funding. These include Norwich in 90 which requires track improvements including the Trowse swing bridge, Haughley Junction, loops in Essex and level crossing upgrades. Also a large number of rail services pass through Ely. Major rail infrastructure improvements are required to accommodate all services committed within franchise agreements and for further frequency improvements in the future. Local authorities are working with local enterprise partnerships, government and Network Rail to bring forward the improvements for delivery in the next round of rail spending, between 2019 and 2024, known as Control Period 6.

Table 14: Priority Rail Projects for promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Norwich to London rail (Norwich in 90)	2019-2024	Being evaluated	Network Rail Control Period 6
Great Yarmouth Rail Station	2019-2024	TBC	Network Rail Control Period 6
Ely area enhancements	Mid 2020's	TBC	Network Rail Control Period 6, NALEP
Broadland Business Park station	Mid 2020s	£6.5 million	Growth Deal, Rail Industry
East West Rail (Cambridge to Oxford)	Late 2020s	Not Known	Government via special purpose delivery vehicle

9.8 Coastal and Marine Planning

The Norfolk coast is of recreational, environmental, economic and cultural importance but it is also home to industry (energy, ports and logistics, digital, food and drink and creative sector), agriculture and tourism.

Coastal Partnership East

Officially launched on 10th June 2016, Coastal Partnership East brings together the coastal management expertise from three local authorities (Great Yarmouth Borough Council, North Norfolk District Council, and East Suffolk Council) these face significant, diverse but also common challenges of a dynamic coastline.

Coastal Partnership East is responsible for 92km of the 173km of coastline in Norfolk and Suffolk, from Holkham in North Norfolk to Landguard Point in Felixstowe. There are approximately 352,000 people who live in the direct coastal zone and many more that work on and visit our coast.

Shoreline Management Plans

The East Anglia Coastal Group's role is to influence and support members to manage the coast for the benefit of the Anglian Region, this role includes supporting the Shoreline Management Plans Process. Shoreline Management Plans (SMPs) are non-statutory plans for coastal defence management planning prepared by the Environment Agency. The aim of an SMP is to provide a strategy for managing flood and erosion risk for a particular stretch of coastline, they provide a large-scale assessment of the risks associated with coastal processes and helps reduce these risks to people and the developed, historic and natural environments.

The SMPs provide estimates of how the coast is likely to change over the next 100 years, taking into account the future implementation of coastal policies, geology, likely impacts of climate change and the existing condition of the coast including coastal defences.

Three Shoreline Management Plans are active along the Norfolk coastal frontage:

- SMP4 the Wash Shoreline Management Plan covers approximately 110 km of coast from Gibraltar Point to Old Hunstanton.
- SMP5 which incorporates the coast to the west of Kelling Hard.
- SMP6 which incorporates the coast to the east of Kelling Hard to Lowestoft Ness.

Shoreline Management Plans exist around all of the coastline of England and Wales.

Marine Plans

The East Inshore and East Offshore Marine Plans have been prepared by the Marine Management Organisation (MMO) and were adopted in April 2014. The East Inshore Marine Plan area includes the coastline stretching from Flamborough Head to Felixstowe, extending from mean high water out to 12 nautical miles, including inland areas such as the Broads and other waters subject to tidal influence, and covers an area of 6,000 square kilometres. The East Offshore Marine Plan area covers the marine area from 12 nautical miles out to the maritime borders with the Netherlands, Belgium and France, a total of approximately 49,000 square kilometres of sea.

The aim of marine plans is to help ensure the sustainable development of the marine area. Marine plans will contribute to economic growth in a way that benefits society whilst respecting the needs of local communities and protecting the marine ecosystem. They will help to reduce the net regulatory burden on applicants and users by acting as an enabling mechanism for those seeking to undertake activities or development in the future and providing more certainty about where

activities could best take place. The MMO is responsible for preparing marine plans for the English inshore and offshore waters. At its landward extent the Marine Plan boundaries extend up to the level of the mean high water spring tides mark (which includes the tidal extent of any rivers), there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. For Norfolk The East Inshore Marine Plan area extends up to Norwich on the River Yare, as well as to Wroxham on the River Bure, and to near Ellingham on the River Waveney and in West Norfolk the River Great Ouse and River Nene are tidal and so the East Inshore Marine Plan area, extends beyond the Borough boundary almost to Peterborough on the Nene and just beyond Earith on the Great Ouse.

The MMO are consulted as part of the local plan process for authorities with coastal borders or where tidal rivers are part of their area. The MMO are also involved with a range of local coastal groups and strategies.

Agreement 27 - Norfolk Planning Authorities and the MMO agree that there are currently no strategic planning issues remaining to be identified and that there is no conflict at a strategic level between the NSPF and adopted Marine Plans. Both parties agree to continue to work together in the preparation of Local Plans being brought forward in Norfolk and any review of the MMOs Marine Plans. Both parties have identified the following areas of common strategic issues:

- Infrastructure
- Governance
- Heritage
- Marine Protected areas
- Marine and coastal employment
- Sustainable port development
- Energy – offshore wind and oil and gas
- Access for tourism and recreation
- Sustainable fisheries and aquaculture in small harbour towns
- AONB and Seascape and landscape (character and natural beauty)
- Biodiversity
- Marine aggregates
- Cabling
- Water quality/water supply and sewerage
- Climate change/ Coastal erosion and coastal change management

9.9 Flood Management and Green Infrastructure

Flood Management

Flood risk is an important issue for Norfolk. Significant parts of the County are vulnerable to tidal, fluvial or surface water flooding from extreme weather events. Such events can pose a significant risk to life as well as property. The three main settlements in the County which all developed in their locations due in part to their access to tidal waters can all be impacted by flooding.

Much of the Norfolk coastline is reliant on flood defences to reduce flood risk to existing development. Considerable further information on the planned interventions that are necessary in order to protect our communities from coastal flooding are set out in the NSIDP. In addition to that an interactive Environment Agency Map can be accessed at [the EA web page - https://environment.data.gov.uk/asset-management/index.html](https://environment.data.gov.uk/asset-management/index.html) which details managed flood risk assets and planned capital schemes. UK Government studies have concluded that climate change over the next 100 years is likely to result in hotter, drier summers and warmer, wetter winters, with more extreme weather events including droughts, floods and sea level rise increasing the level of risk from flooding that is faced by communities in Norfolk.

To address these strategic issues it will be necessary to take a co-ordinated and proportionate approach to managing flood risk including the opportunities not only for mitigation but also adaptation. Flood risk assessments are to be used effectively to ensure development is located appropriately and away from areas of flood risk wherever possible. Developers will need to work closely with the relevant risk management authorities in minimising flood risk from all sources through a combination of high quality urban design, natural flood risk management including green infrastructure, as well as use of Sustainable Drainage Systems (SUDs) which can provide multi-functional benefits not limited to flood risk and can form part of an integrated approach to water management with water re-use measures forming part of the overall design of developments. Early engagement with the relevant risk management authorities is required prior to the submission of some planning applications. Anglian Water's Water Smart Communities⁹¹ combine different elements of water management together with town planning and design to deliver multiple benefits for communities and the environment. They use a more holistic and integrated approach to urban water management, with the aim to:

- Enhance liveability by contributing to green streetscapes and high quality open space
- Promote sustainable use of water resources and infrastructure to enable growth
- Build resilience against the potential impacts of climate change and extreme weather events
- Contribute to natural capital and biodiversity through multi-functional water features
- Deliver water efficient homes to reduce household bills and support affordability

Anglian Water together with the LLFAs (including Norfolk County Council) have also created a Water Management Checklist⁹² for Local Plan policies.

⁹¹ See [Water smart Communities - https://prod-swd.anglianwater.co.uk/siteassets/household/about-us/aws-water-smart-communities---flyer.pdf](https://prod-swd.anglianwater.co.uk/siteassets/household/about-us/aws-water-smart-communities---flyer.pdf)

⁹² See [AW water management checklist - https://www.anglianwater.co.uk/siteassets/household/about-us/water-management-checklist-for-local-policies.pdf](https://www.anglianwater.co.uk/siteassets/household/about-us/water-management-checklist-for-local-policies.pdf)

Further guidance on how this will be done is available on the County Council website in its role as the Lead Local Flood Authority for the County⁹³. The Government has also set out the National Flood and Coastal Erosion Risk Management Strategy for England⁹⁴. This strategy's long-term vision is for a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100. It has 3 long-term ambitions, underpinned by evidence about future risk and investment needs. They are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action

The Local Flood Risk Management Strategy (LFRMS) for Norfolk must be consistent with the National FCERM Strategy. The LFRMS is in the process of being updated to include policies for zero emissions and environmental net gain in local flood risk activities and supporting communities to be more flood resilient.

⁹³ See in particular [Lead Local Flood Authority Information - https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf](https://www.norfolk.gov.uk/-/media/norfolk/downloads/rubbish-recycling-planning/flood-and-water-management/guidance-on-norfolk-county-councils-lead-local-flood-authority-role-as-statutory-consultee-to-planning.pdf)

⁹⁴ See [National Flood and Coastal Erosion Risk Management Strategy for England - https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2](https://www.gov.uk/government/publications/national-flood-and-coastal-erosion-risk-management-strategy-for-england--2)

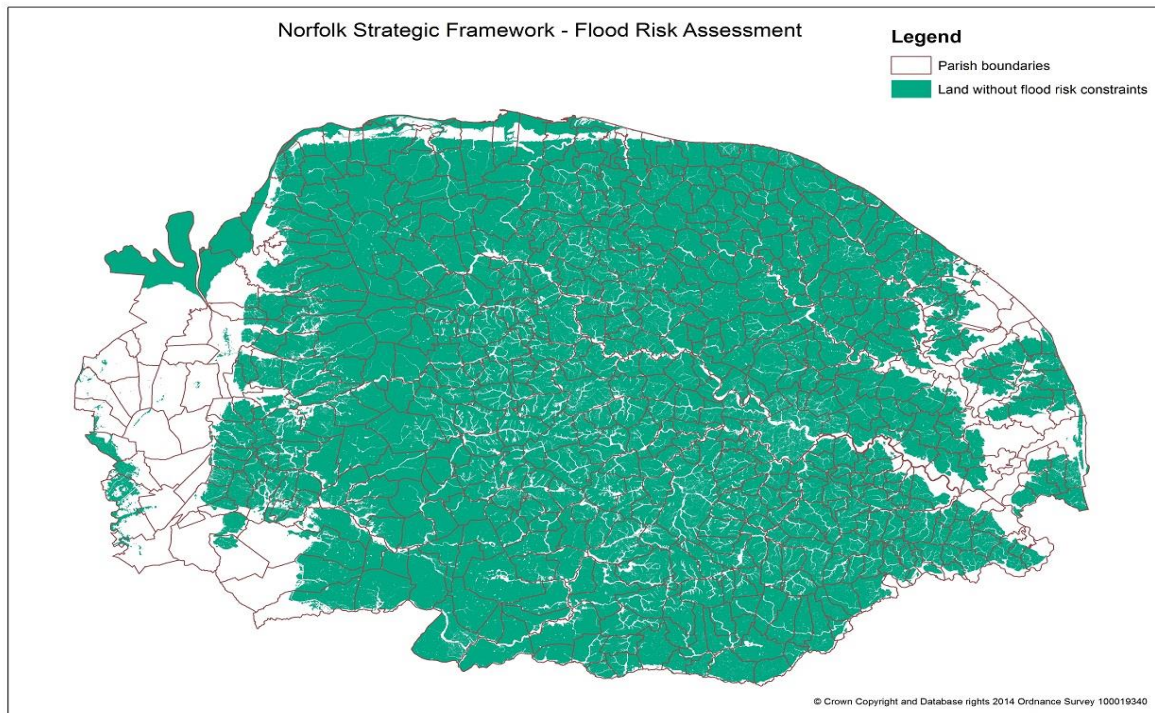


Figure 10: Norfolk Flood Risk Map. 2016

Figure 10 provides an illustration, at a broad scale, of the extent of land with and without flood risk constraints from rivers and the sea in Norfolk. Whilst it is clear that significant areas of the County are free from flood risk constraint it should be noted that many of the currently developed urban areas are at some risk of flooding. It will be important to ensure that a pragmatic approach is taken to new development and consideration of on-site and off-site flood risk. If planned correctly and measures for betterment are agreed and implemented, new development can significantly reduce the flood risk faced by existing communities in these areas.

As flood waters do not respect administrative boundaries there will be a need for the Norfolk Planning Authorities to continue to work closely together on assessing and minimising flood risk as well as on responding to emergencies when they do occur. For example, the Broadland Futures Initiative is a strategic project to explore how best to manage flood risk in the inter-related areas of the Norfolk and Suffolk Broads, the coast between Eccles and Winterton (which protects the Northern Broads) and the entrance to the Broads system through Great Yarmouth. The project will guide decision making over the short, medium and long term.

A number of significant investments have recently been made or are planned in the near future to help alleviate flood risk, this includes the completion on the £19.3m Bacton Walcott Sandscaping scheme. Further projects are detailed in Local Plans, coastal management plans and strategic flood risk assessments and included in the county wide NSIDP.

Table 15: Priority Strategic Flood Defence Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
Great Yarmouth Tidal Defences (Epoch 2)	Commenced Oct 2019	£40.3 million	NALEP, Local Authorities and Private Sector
Great Yarmouth Tidal Defences (Epoch 3)	mid 2023	£29.5 million	NALEP, Local Authorities and Private Sector
Future Fens – Flood Risk Management	2030	Phase 2 £10-15m	Central Government, Local Government, Internal Drainage Boards and other funding sources from beneficiaries.

Green Infrastructure and the Environment

Green infrastructure (GI)⁹⁵ is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of economic, environmental and quality of life benefits for local communities. The provision of green infrastructure in and around urban areas helps create high quality places where people want to live and work. New GI can also mitigate impacts on existing sensitive sites and support heritage and conserve the historic environment. Access is an integral part of GI and PROW and 'Norfolk Trails' are an important asset.

The area has a wealth of environmental assets ranging from international and national status, to those of local importance. These must be safeguarded and enhanced for the benefit of current and future generations. Many of Norfolk's natural habitats have been lost and fragmented with once extensive areas of habitats reduced to small remnants isolated from each other and surrounded by relatively inhospitable land uses, reducing biodiversity and increasing vulnerability.

⁹⁵ [The definition of GI is set out in the Natural England document GI Guidance -
http://publications.naturalengland.org.uk/file/94026](http://publications.naturalengland.org.uk/file/94026) , in terms of the NSPF it includes 'blue infrastructure' ie water environments - rivers, lakes, ponds etc.

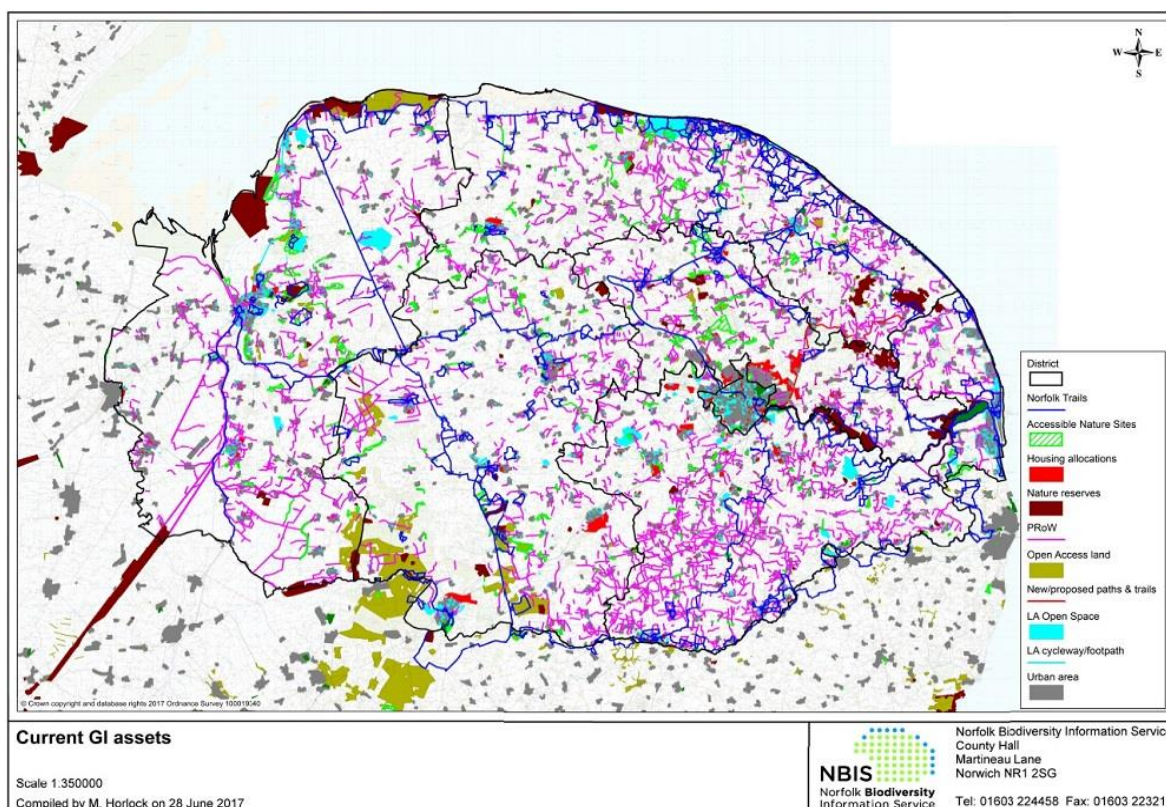


Figure 11: Norfolk's current GI assets. 2017

Current GI assets are set out in Figure 11⁹⁶. Green infrastructure should be provided as an integral part of all new development, where appropriate, alongside other infrastructure such as utilities and transport networks.

Planning for green infrastructure should occur at the evidence gathering (survey and analysis) stage of the planning process, so that green infrastructure responds to character and place, and that standards are set for green infrastructure accessibility, quantity and quality. Early integration of green infrastructure can also ensure that it is properly planned in advance of development or delivered alongside development on a phased basis. In this way green infrastructure can be planned as an integral part of the community. (Natural England Green infrastructure guidance, P43)

With the anticipated introduction of the Environment Bill in January 2021, legally binding targets for Biodiversity Net Gain and Local Nature Recovery Networks will support the vision of the 25 year Environment Plan and the GI Network work will form an important foundation for this.

⁹⁶ Further more detailed maps are available from the NBIS website see <http://www.nbis.org.uk/sites/default/files/documents/Maps.zip>

As Norfolk grows and changes in terms of its demographic profile considerable investment in the provision and maintenance of a GI network will be needed in order to facilitate and support growth whilst also:

- Minimising the contributions to climate change and addressing their impact;
- Protecting, managing and enhancing the natural, built and historical environment, including landscapes, natural resources and areas of natural habitat or nature conservation value;
- Creating more or restoring lost wildlife rich habitat outside protected site networks to reverse the loss of biodiversity
- Ensuring existing and new residents many of whom may be elderly receive the health and quality of life benefits of good green infrastructure and are able to access appropriate recreational opportunities;
- Maintaining the economic benefits of a high quality environment for tourism; and
- Protecting and maintaining the Wensum, Coast, Brecks and the Broads.

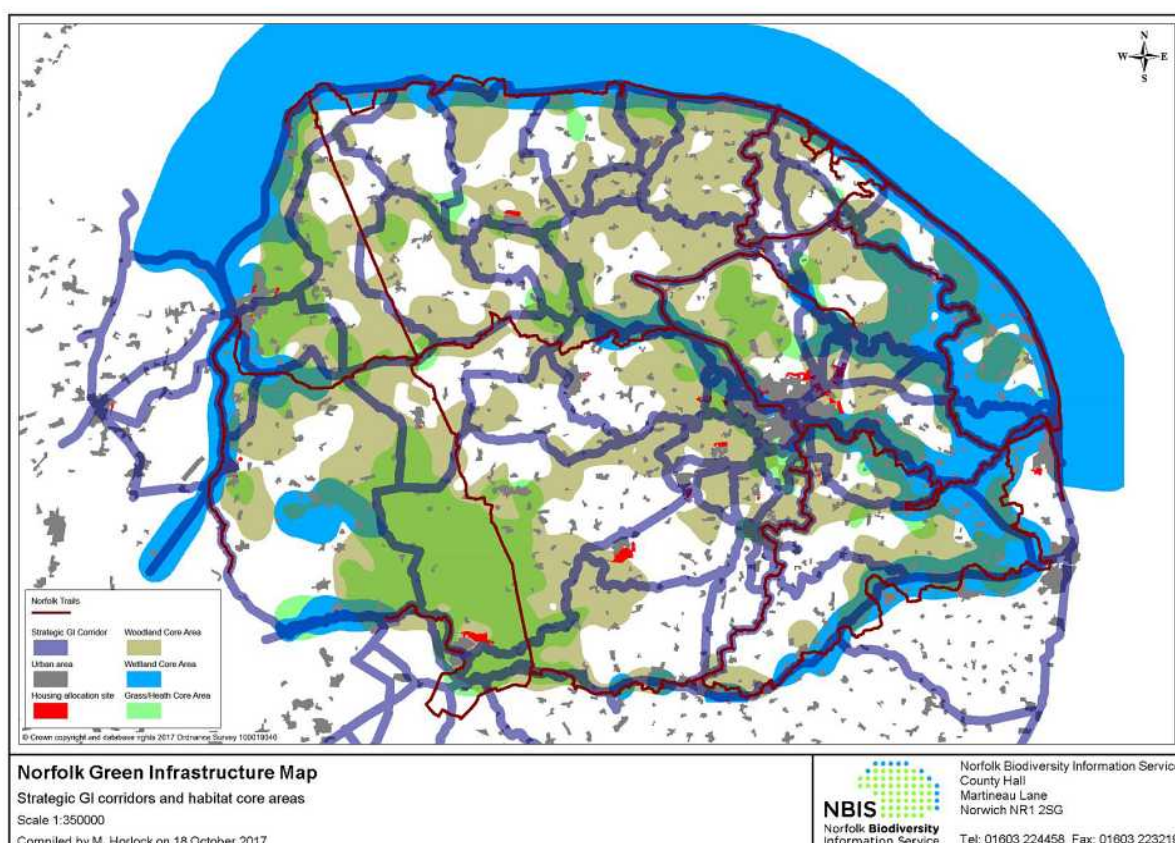


Figure 12: Norfolk's GI corridors. 2017

Figure 12 shows the identified potential Green Infrastructure Corridors. The intention is for this map to inform Local Plans, and also local GI Strategies. It should be noted that depending on the nature of corridor they may not constrain development, indeed in some circumstances promoting growth in these corridors may enhance their GI value.

One of the strategic aims for the Environment section is to not only 'protect, maintain and enhance biodiversity' but also to restore and create habitats which support biodiversity. New growth in

Norfolk must respect this aim, but the use of green infrastructure either existing or new can greatly aid the assimilation of new development.

A commissioned report by Footprint Ecology on the impact of recreational pressures on Natura 2000 protected sites e.g. North Norfolk Coast, The Broads and the Brecks, likely to arise from new housing growth gave insights into the scale and location of that pressure. This is a complex area, many of the Natura 2000 sites attract large numbers of visitors, acting as green infrastructure, but are sensitive environments with specific legislative requirements.

As part of producing this Framework the authorities are working to produce, in collaboration with the Environment Agency, Natural England, Wild Anglia, Forestry Commission and other local partners, the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy. This is an action plan which looks to address the recreational pressures on Natura 2000 protected sites in a coordinated way and therefore helps address requirements arising from Habitat Regulations Assessments from respective Local Plans. The Strategy includes:

- A Recreational Impact Avoidance and Mitigation Strategy (RAMs) - a County Wide programme of mitigation measures to avoid adverse effects on protected habitat sites from the in-combination recreational impacts from new residential development. The cost of measures is proposed to be funded by a tariff on new residential development.
- Identification of GI opportunities which aims to divert visitors from sensitive habitat sites

Agreement 28: In recognition of:

a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity;

b) the pressure that development in Norfolk could place on these assets; and

c) the importance of ecological connections between habitats

Norfolk Planning Authorities will work together to complete and deliver the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy which will aid Local Plans in protecting and where appropriate enhancing the relevant assets.

With regard to the emerging priority projects for short term effort to bring forward, the following feature within the SNIDP.

Table 16: Priority Green Infrastructure Projects for Promotion

Project Name	Estimated Start date	Estimated Cost	Likely funding sources
The Green Loop (Walking/cycling route linking Norwich – Aylsham – Hoveton –NE Growth Triangle)	Not Known	£5.7m	S106, CIL, DfT, NALEP, Interreg Experience-secured
Weavers Way	2023	£3.1m	RDPE,HLF,NALEP
North West Woodlands Country Park	Ongoing	£2m	BDC, CIL, BRP
Burlingham Country Park	2021	TBC	CIL, BRP, NCC, Developer Funding

9.10 Minerals and Waste

Minerals

Carstone is a type of sandstone that is quarried in west Norfolk. It has traditionally been used as a vernacular building material, although it is no longer used to any significant degree. Although it is classed as a 'hard rock' it is not used as a hard rock (e.g. road dressing), instead it is used primarily as fill (to raise the levels of land prior to construction) or in the formation of embankments. Therefore it is often used in the construction of roads.

Carstone deposits are located in very limited areas of west Norfolk. In 2019 there were two carstone extraction sites in Norfolk, located at Middleton and Snettisham.

Carstone production in Norfolk was 39,878 tonnes in 2019. The 10 year rolling average of carstone sales was 75,380 tonnes in the period 2010-2019. The 3 year rolling average of carstone sales was 81,245 tonnes in the period 2017-2019. The permitted reserves for carstone extraction sites in Norfolk were 1.72 million tonnes at the end of 2019. Based on the 10 year sales average, at the end of 2019 there was a carstone landbank of permitted reserves of over 22 years.

Silica sand deposits are located in very limited areas of west Norfolk, a relatively narrow band which runs north to south just to the east of King's Lynn. The northern extent of the silica sand resource is at Heacham, and the southern extent around Hilgay. In Norfolk the silica sand resource is split into two broad categories, the Mintlyn Beds and the Leziate Beds; historically the Leziate Beds have been used principally for glass sand and the Mintlyn Beds for the production of foundry sand. Processing of sand for foundry use has stopped at Leziate and those parts of the process plant dedicated to their production have been removed. This reflects a general decline in the demand for foundry sand in England.

The deposit which is being worked at Leziate is one of two in England where silica sand of sufficient purity and grade for the manufacture of colourless flint (container) and float (window) glass is extracted. The other extraction site of silica sand of comparable quality is in Surrey.

Silica sand which is to be used for glass manufacture requires a significant amount of processing prior to being suitable for onward shipment to the glass manufacturers. This processing requires large and capital intensive plant such as the one operated by Sibelco UK Ltd which is located at Leziate. Consistency of material is an important consideration and this requires blending of sand from different areas of the working. The processing plant site includes a rail head to export the processed mineral for use by glass manufactures elsewhere. Norfolk is one of the most important sources of silica sand in Great Britain, accounting for approximately 16 per cent of total silica sand production and 58 per cent of glass sand production in Great Britain in 2018.

Due to the cost and largely fixed nature of the processing plant and railhead, silica sand working has historically taken place in close proximity to the Leziate processing plant. However, this now means that the most accessible areas have either been worked or are in the process of being worked.

The 10 year rolling average of silica sand sales in Norfolk was 780,700 tonnes in the period 2010-2019. The 3 year rolling average of silica sand sales was 854,100 tonnes in the period 2017-2019. The permitted reserves for silica sand extraction sites in Norfolk were 3.181 million tonnes at the end of 2019. Based on the 10 year sales average, at the end of 2019 there was a silica sand landbank of permitted reserves of over 4 years.

Sand and gravel resources are located throughout the County (with the exception of the Fens area in the far west and south-west of Norfolk). Sand and gravel is used in the construction of roads and buildings and it is a key ingredient in the production of concrete and mortar, asphalt coating for roads, as a drainage medium and in the construction of embankments and foundations. The distribution of sand and gravel sites throughout Norfolk is widespread with a relatively large number of small operators. In 2019 there were 25 permitted sand and gravel extraction sites in Norfolk operated by 14 different companies. There are, however, particular clusters of sand and gravel workings near to King's Lynn, in the north of Breckland District and around Norwich.

Sand and gravel production in Norfolk was 1.329 million tonnes in 2019. The 10 year rolling average of sand and gravel sales was 1.356 million tonnes in the period 2010-2019. The 3 year rolling average of sand and gravel sales was 1.48 million tonnes in the period 2017-2019. The permitted reserves for sand and gravel extraction sites in Norfolk were 13.52 million tonnes at the end of 2019. Based on the 10 year sales average, at the end of 2019 there was a sand and gravel landbank of permitted reserves of over 9 years.

Secondary and recycled aggregates are also sourced within Norfolk. The annual average quantity of inert and construction/demolition waste recovered at waste management facilities over the ten years from 2009-2018 was 412,100 tonnes, however, some parts of this waste stream are unsuitable for use as a recycled aggregate (such as soil or timber). The data is not comprehensive because many operations, such as on-site recovery, are not recorded.

Marine aggregate dredging is carried out by companies on behalf of the Crown Estate and the sites are licensed by The Crown Estate and the MMO. Aggregates from marine dredging are not currently received at any ports or wharves in Norfolk. A total of less than 500 tonnes of marine sourced aggregates was consumed in Norfolk in 2014 (the most recently available date), this represents such a small percentage of the total aggregates used in Norfolk that no adjustments have been made to the mineral requirement figures in the Norfolk Minerals and Waste Local Plan based on marine sourced aggregates. Norfolk County Council does not determine planning applications for marine aggregates and they do not form part of the Minerals and Waste Local Plan.

Clay and chalk are also extracted in Norfolk. Clay is primarily used in the engineering of landfill sites and in flood protection schemes. Chalk is primarily used as a liming agent for farmland. In 2019 there was one active clay working at Middleton, and three active chalk workings located at Castle Acre, Caister St Edmund and Hillington. However, the resource for these minerals is considered to be abundant in Norfolk relative to the demand.

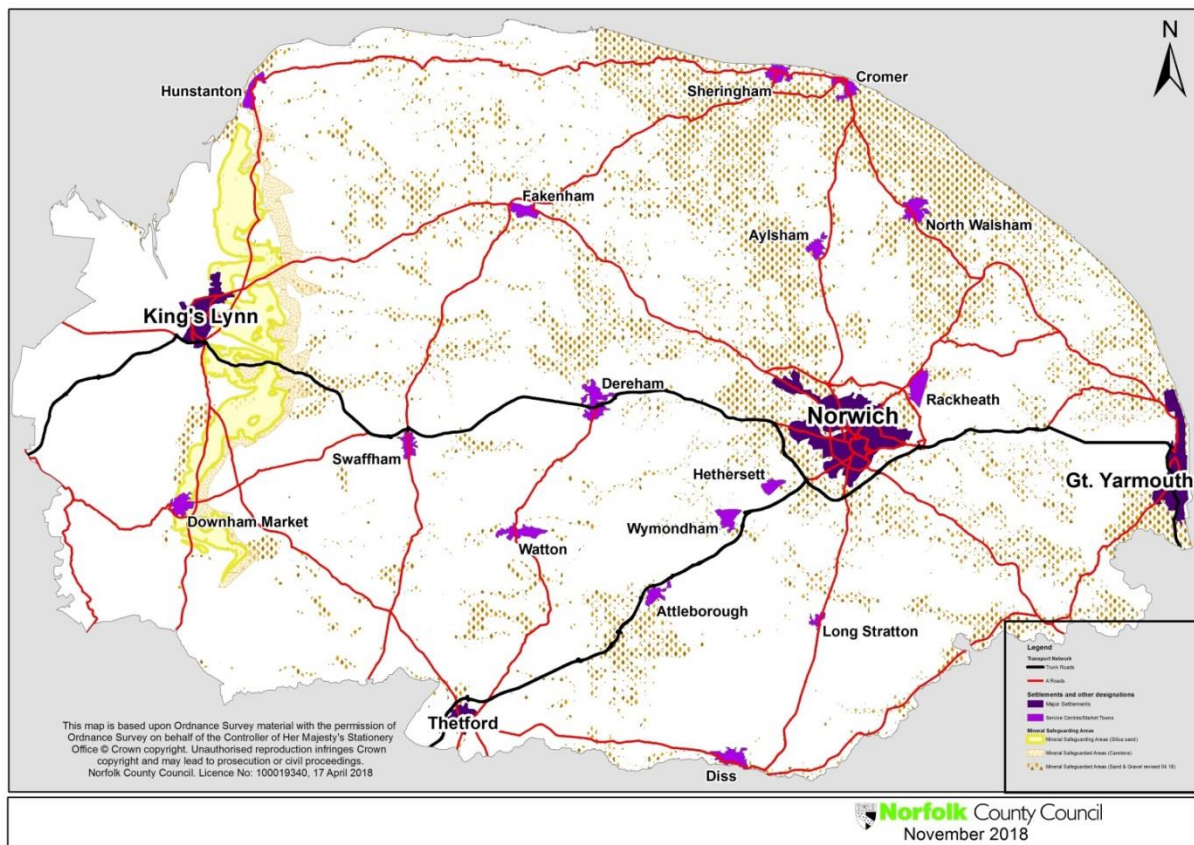


Figure 13: Mineral Resources within Norfolk

Waste

There are a number of waste management facilities within Norfolk. They include:

20 Household Waste Recycling Centres, provided by Norfolk County Council, which accepted nearly 67,000 tonnes of waste in 2018/19.

7 commercial composting facilities which received nearly over 107,000 tonnes of waste in 2018/19, as well as a few small community composting facilities;

There are two metal recycling facilities at Lenwade and Great Yarmouth, one metal recycling facility at King's Lynn docks and a large number of small sites accepting scrap metal or end-of life vehicles. The metal recycling facilities received nearly 192,000 tonnes of waste in 2018/19;

58 operational sites for the treatment and/or transfer of waste (including municipal, commercial and industrial, hazardous, clinical, construction and demolition), which received over 1,746,000 tonnes of waste in 2018/19 and 24 sites for the treatment and transfer of inert waste (including construction and demolition waste) only, which received over 260,000 tonnes of waste in 2018/19;

There are two non-hazardous landfill sites (Blackborough End and Feltwell) in Norfolk. Feltwell landfill site has not received any waste since 2012; it is required to be restored by 2041. Blackborough End landfill site did not receive any waste for disposal for nearly four years, during 2016 to 2019, but it started receiving waste again in 2020. Blackborough End landfill site is required to be restored by the end of 2026. These two sites have a permitted void capacity (remaining landfill space) for non-hazardous waste estimated to be 1.534 million cubic metres, plus capacity for 3.5

million tonnes of inert waste disposal. In 2018/19 over 260,000 tonnes of inert waste was received at inert landfill sites or used in the restoration of mineral workings.

There is a renewable energy plant operated by EPR at Thetford which received over 666,600 tonnes of waste in 2018/19. The waste received at this facility is poultry litter which is burned to produce energy.

Agreement 29 :

It is agreed that:

- 1) It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. The Norfolk Minerals and Waste Local Plan will therefore enable Norfolk to continue to be self-sufficient in the production of sand and gravel, whilst making an important contribution to the national production of silica sand.**
- 2) A steady and adequate supply of minerals to support sustainable economic growth will be planned for through allocating sufficient sites and/or areas in the Norfolk Minerals and Waste Local Plan to meet the forecast need for sand and gravel, carstone, and silica sand.**
- 3) Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation. Resources of sand and gravel, carstone and silica sand within defined Mineral Safeguarding Areas will be safeguarded from needless sterilisation by non-mineral development. Infrastructure for the handling, processing and transportation of minerals will also be safeguarded from incompatible development. Defined waste management facilities and water recycling centres will be safeguarded from incompatible development.**
- 4) The Norfolk Minerals and Waste Local Plan policies will enable the re-use, recycling and recovery of waste in Norfolk to increase, thereby reducing the quantity and proportion of waste arising in Norfolk that requires disposal, in accordance with the Waste Hierarchy.**
- 5) The Norfolk Minerals and Waste Local Plan will enable Norfolk to be net self-sufficient in waste management, where practicable and to enable sufficient waste management infrastructure to be provided in order for Norfolk to meet the existing and forecast amount of waste expected to arise over the Plan period.**
- 6) The Norfolk Minerals and Waste Local Plan will direct new waste management facilities to be located in proximity to Norfolk's urban areas and main towns. Priority for the location of new waste management facilities will be given to the re-use of previously-developed land, sites identified for employment uses, and redundant agricultural and forestry buildings and their curtilages.**
- 7) The Norfolk Minerals and Waste Local Plan will contain policies to ensure that minerals development and waste management facilities will be located, designed and operated without unacceptable adverse impacts on the amenity of local communities, the natural, built and historic environment, the landscape and townscape of Norfolk.**

Section 10 – Conclusions and Next Steps

This Framework documents how the Norfolk Planning Authorities maintain effective cooperation between themselves, with the neighbouring district and county planning authorities, and with other key relevant agencies and utilities. In doing so it meets the relevant requirements of Section 3 of the 2019 National Planning Policy Framework (NPPF).

As referred to in section one of this document the government has announced a consultation on landmark reforms to the planning system under the Planning for the Future White Paper⁹⁷ which includes the proposed change to abolish the Duty to Cooperate. Once further clarification is provided by central government through new legislation and a revised National Planning Policy Framework it will become clear if Norfolk Planning Authorities can continue to address strategic planning matters through a revision of this document.

However Norfolk Planning Authorities recognise the benefits of joint working beyond the Duty to Cooperate and will maintain the following agreement:

Agreement 30 In recognition of the benefits gained by co-ordinating and co-operating on strategic planning activities the Norfolk Planning Authorities agree to support the activities of the Norfolk Strategic Planning Member Forum and to continue to appropriately resource joint planning activity.

There remains significant value in continuing with a work programme into the next financial year to address strategic cross boundary issues going forward.

As part of the proposed joint planning activity Norfolk Planning Authorities have agreed to undertake the following programme of work:

- **Investigate the production of a Norfolk Design Guide/Charter** - The white paper strengthens the need for local design initiatives and the work of the NSPF completed this year has highlighted that design guidance could help with both climate change and healthy living initiatives. The initial steps would be to investigate how this could best be achieved and to what level all authorities are willing to work to a single design guide.
- **Develop an implementation programme for a county wide RAMS tariff** and Enhanced Green Infrastructure Study - Subject to the approval of all Norfolk authorities to the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy there will be a requirement to implement and start collection of the new RAMS Tariff. The report and Natural England also recommend that further work is also carried out to undertake an enhanced Green Infrastructure audit and this should highlight appropriate measure in areas of deficiency.
- **Review of the Norfolk HELAA Methodology** - The County wide Housing and Economic Land Availability Assessment Methodology is now nearly 5 years old and based on the 2012 version of the NPPF. Norfolk Local Planning authorities have agreed to review this in light of any new requirements from a revised NPPF.

⁹⁷ See [the planning for the future consultation - https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system](https://www.gov.uk/government/news/launch-of-planning-for-the-future-consultation-to-reform-the-planning-system)

- **Review of the health protocol** – as highlighted in section 7
- **Review of new evidence requirements to support the production of future local plans** - whilst the White paper lacks much detail, it is likely that evidence in a number of areas will need to be created or updated to support the production of local plans.
- **Possible Requirements to update this document** - Once further clarification is provided by central government through new legislation and a revised NPPF it will become clearer if Norfolk Local Planning Authorities can continue to address strategic planning matters through a revision to the NSPF.

There also remains other significant benefits to continue with the current strategic planning activities completed under this remit, these included:

- Maintaining links to other neighbouring counties and their strategic planning work.
- Maintain links to public bodies and Utilities involved in the preparation of local plans eg Natural England, Environment Agency, Anglian Water, MMO, and UKPN.
- Maintain links to other key initiatives in the county eg Water Resources East, Hydrogen East, Greater South East Energy Hub
- Support the county in the production of a county wide Infrastructure Delivery Plan and any potential economic or growth strategies
- Support of Local Plan processes across the county
- Maintain links to NHS estates and the CCG with regular meetings to share updates on key developments and progress of Local Plans
- Scope to continue to commission joint studies across the county to reduce costs

The current NPPF also sets out the requirement for local authorities to prepare and maintain one or more statements of common ground. This document is intended to meet this requirement in a single document for all matters relevant to all Norfolk Local Authorities. Additionally individual local authorities may seek to enter into further statements of common ground with neighbouring or other authorities to address further strategic planning issues as part of the local plan preparation process.

Agreement 31: Norfolk Planning Authorities with support of the signatories of the document agree to maintain this statement of common ground.

Appendix 1 – NSPF Contacts:

Please direct all representations relating to the NSPF to the NSPF Project Manager as detailed below. Use the Local Planning Authority contact details only if you have enquiries concerning a specific authority area.

NSPF Programme Manager	
Trevor Wiggett City Hall St Peter's Street Norwich NR2 1NH Email: trevorwiggett@norwich.gov.uk	
Breckland Council	Broadland and South Norfolk Councils
Andrew Darcey Planning Policy Manager Breckland Council and South Holland Council Elizabeth House, Walpole Loke Dereham NR19 1EE Tel 07901873599 Email : Andrew.Darcey@breckland.gov.uk	Paul Harris Place Shaping Manager Broadland District Council Thorpe Lodge 1 Yarmouth Road Norwich NR70DU Tel 01603 430444 Email : paul.harris@broadland.gov.uk
The Broads Authority	Great Yarmouth Borough Council
Natalie Beal Planning Policy Officer Broads Authority Yare House 62-64 Thorpe Road Norwich NR1 1RY Tel 01603 756050 Email : Natalie.Beal@broads-authority.gov.uk	Sam Hubbard Strategic Planning Manager Great Yarmouth Borough Council Town Hall, Hall Plain Great Yarmouth Norfolk NR30 2QF Tel 01493 846624 Email: sam.hubbard@great-yarmouth.gov.uk
Borough Council of King's Lynn and West Norfolk	Norfolk County Council
Alan Gomm Planning Policy Manager Borough Council of King's Lynn and West Norfolk Kings Court, Chapel Street King's Lynn PE30 1EX Tel 01553 616237 Email : alan.gomm@west-norfolk.gov.uk	Stephen Faulkner Principal Planner Norfolk County Council Martineau Ln Norwich NR1 2UA Tel 01603 222752 Email : stephen.faulker@norfolk.gov.uk
North Norfolk District Council	Norwich City Council
Mark Ashwell Planning Policy Manager North Norfolk District Council Council Offices, Holt Road Cromer NR27 9EN Mail : mark.ashwell@north-norfolk.gov.uk Tel 01263 516325	Judith Davison Planning Policy Team Leader City Hall St Peter's Street Norwich NR2 1NH Mail : judithdavison@norwich.gov.uk Tel 01603 989314

Appendix 2 – Cross Border Cooperation Initiatives

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
Coastal Partnership East	North Norfolk, Great Yarmouth, East Suffolk	Shared Coastal Management Team for the four authorities.	Ongoing	Coastal Zone Planning Statement of Common Ground (2018), setting out an agreed approach to coastal planning (<u>note</u> additional signatories to Statement: Broads Authority, BC King's Lynn & West Norfolk; and endorsed by Environment Agency).	<u>Coastal Partnership East Website - https://www.coasteast.org.uk/</u>
Membership of Broads Authority	Broadland, Great Yarmouth, North Norfolk, Norwich, South Norfolk, East Suffolk, Norfolk and Suffolk.	Each provides members to govern the Broads Authority.	Ongoing		<u>Membership of Broads Authority - http://www.broads-authority.gov.uk/about-us/who-we-are/members/meet-our-members</u>
East Suffolk/Great Yarmouth sub regional meetings	East Suffolk, Great Yarmouth, Broads Authority.	Quarterly Periodic meetings between these three eastern authorities to discuss strategic cross boundary issues pertinent to the area.	Ongoing	East Suffolk Local Plan Duty to Cooperate Statement of Common Ground (2018) on Housing Market Area, Functional Economic Area and Objectively Assessed Need, between East Suffolk, Great Yarmouth, Broads Authority, South Norfolk, Suffolk Coastal, and Mid-Suffolk.	n/a
Norfolk Coast (AONB) Partnership	Great Yarmouth, North Norfolk, King's Lynn & West Norfolk, Norfolk, Broads Authority, Natural England	Management of the Norfolk Coast Area of Outstanding Natural Beauty.	Ongoing	The Partnership also includes 2 community representatives.	<u>Norfolk Coast (AONB) Partnership website - http://www.norfolkcoastaonb.org.uk/partnership/core-management-group/169</u>
Memorandum of Understanding – Treatment of Housing and Employment Needs	Broads Authority, Broadland, South Norfolk, Norwich, Great Yarmouth, East	Agreed mechanism for distribution of housing (and employment) development in relation to targets for	2014 (and previously)	Further Statement of Common Ground (2017) between Broads Authority and Great Yarmouth Borough Council updating and	n/a

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
and Delivery in the Broads Authority Area	Suffolk, Norfolk, Suffolk.	overlapping district and Broads areas.		specifying this in relation to housing in Proposed Broads Local Plan	
New Anglia Local Enterprise Partnership	All Norfolk and Suffolk District and County Councils	To lead economic growth and job creation across Norfolk and Suffolk.	Ongoing	Partnership also includes private sector and education representatives.	New Anglia Local Enterprise Partnership website - https://newanglia.co.uk/
Wherry Line Community Rail Partnership	Norfolk, Suffolk, Norwich, Broadland, Great Yarmouth, East Suffolk.	To promote the railway and the surrounding area to develop economic and environmental benefits for residents, visitors and tourists.	Ongoing	Partnership also includes Abellio Greater Anglia, Network Rail, Railfuture, Norfolk Association of Local Councils, rail users, station adopters, RSPB, and local businesses.	Greater Anglia Community partnerships - https://www.greateranglia.co.uk/about-us/community-rail-partnerships
Great Yarmouth Transport and Infrastructure Steering Group	Great Yarmouth, Norfolk, Environment Agency, Highways England	To promote and coordinate infrastructure improvements in, around and benefitting Great Yarmouth Borough	Ongoing		Great Yarmouth Transport and Infrastructure Steering Group - https://great-yarmouth.cmis.uk.com/great-yarmouth/Committees/CommitteeSystemfromMay2016/tabid/142/ctl/ViewCMIS_CommitteeDetails/mid/562/id/170/Default.aspx
A47 Alliance	Norfolk, Great Yarmouth, Broadland, Norwich, Breckland, King's Lynn & West Norfolk, Broads Authority	Seeks to promote the dualling of the A47.		Alliance also includes Peterborough & Cambridgeshire local authorities, MPs, business groups, LEs, etc.	A47 Alliance website - http://www.a47alliance.co.uk/
Greater Norwich Development Partnership	Norwich, Broadland, South Norfolk, Norfolk County Council and the Broads Authority	Partnership to produce Local Plan for Greater Norwich Area and address related planning policy issues such as housing land supply and monitoring. This involves a member level group and joint officer team.	Ongoing		Greater Norwich website - http://www.greaternorwichgrowth.org.uk/
Greater Norwich Growth Board	Norwich, Broadland, South Norfolk, Norfolk County Council and the Broads Authority	Member level Board and joint officer team for strategic investment planning and delivery across the Greater Norwich area. This includes pooling of CIL receipts and a joint CIL process.	Ongoing		Greater Norwich website - http://www.greaternorwichgrowth.org.uk/

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
Norfolk Strategic Planning Officers Group	All Norfolk Local Planning Authorities	Monthly meeting of Heads of Planning Policy teams to discuss cross boundary issues.	Ongoing		Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf
Norfolk Member Forum	All Norfolk Local Planning Authorities	Over sees Duty to Cooperate requirements at a member level, in particular the production of the NSPF.	Ongoing		Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf
Norfolk Strategic Planning Framework	All Norfolk Local Planning Authorities	Shows how the Authorities work together and forms the Statement of Common Ground for the area. Addresses cross boundary issues.	Reviewed for 2021.		Norfolk Strategic Planning Member Forum web page - www.norfolk.gov.uk/nsf
The Wash and North Norfolk Marine Partnership	East Linsey, Boston, Fenland, South Holland, Kings Lynn & West Norfolk, North Norfolk, Lincolnshire County Council and Norfolk County Council	Local Communities and Management Groups working together to protect marine heritage	On-going	Many other Agencies and local groups involved	The Wash and North Norfolk Marine Partnership website - https://wnnmp.co.uk/home/partnerships/
Norfolk/Suffolk Cross border Meeting	Babergh and Mid Suffolk, South Norfolk, Great Yarmouth, Broads Authority, Ipswich Borough, Suffolk County, West Suffolk, Breckland, Kings Lynn & West Norfolk, East Suffolk	Quarterly meetings of Planning Policy teams to discuss cross boundary issues.	Ongoing		
Wisbech Access Strategy Steering Group	Kings Lynn & West Norfolk, Norfolk County Council, Cambridgeshire County Council,		Ongoing		

Cooperation mechanism	Authorities involved	Brief details	Date	Other Comments	Website link (if relevant)
	Fenland DC, Wisbech Town Council				
Norfolk Rail Group	Norfolk & Suffolk County Councils, all districts		Ongoing		
Joint SFRA Update	Kings Lynn & West Norfolk, North Norfolk DC, Greater Norwich, Broads Authority, Great Yarmouth	Team over was the production of a Joint SFRA across most of Norfolk	Completed		
East of England Aggregates Working Party	Norfolk, Suffolk, Essex, Hertfordshire and Cambridgeshire County Councils. Peterborough, Thurrock, Southend-on-Sea, Luton, Bedford, Central Bedfordshire Councils	Quarterly meetings. Collect data relating to the supply and demand of aggregates, publish an annual monitoring report, provides technical advice to Mineral Planning Authorities on their Local Aggregate Assessments. Line of communication between MPAs and MHCLG.	Ongoing	The EoEAWP also includes representatives from the minerals industry, Marine Management Organisation, and MHCLG. Includes feedback and liaison with London AWP and South East AWP.	East of England Aggregates Working Party web page - http://www.centralbedfordshire.gov.uk/planning/minerals-waste/aggregate/overview.aspx
East of England Waste Technical Advisory Body	Norfolk, Suffolk, Essex, Hertfordshire and Cambridgeshire County Councils. Peterborough, Thurrock, Southend-on-Sea, Luton, Bedford, Central Bedfordshire Councils	Quarterly meetings. Forum for discussion relating to waste planning including waste data, capacities and forecasting.	Ongoing	The EoEWTAB is also attended by the Environment Agency. Includes feedback and liaison with London WTAB and South East WTAB.	

Report to Sustainable Development Panel
18 March 2021
Report of Director of place
Subject Right to Regenerate Consultation

Item

6

Purpose

To comment on Norwich City Council's response to the Right to Regenerate Consultation.

The Ministry of Housing, Communities and Local Government recently consulted on the Right to Regenerate. The government's aim is that through reforming the current Right to Contest and relaunching it as the Right to Regenerate, it will be easier for individuals, businesses and organisation to identify, purchase and redevelop underused or unused land which is currently in public ownership.

The consultation was published on 16 January 2021 and closed on 13 March 2021. Owing to the timescales the attached response has already been submitted, but the council has reserved the right to submit an amended response following the meeting.

Recommendation

To agree the contents of the Norwich City Council's response to the Right to Regenerate Consultation and note that the panel has the opportunity to submit further comments.

Corporate and service priorities

The report helps to meet the corporate priorities of great neighbourhoods, housing and environment, people living well and inclusive economy and the service plan priority to implement the local plan for the city.

Financial implications: None directly

Wards: All wards

Cabinet member: Councillor Stonard – Sustainable and inclusive growth

Contact officer(s)

Joy Brown, Senior planner (policy), 01603 989245

Background documents

None

Report

Introduction

1. Strand 2 of the Community Right to Contest allows members of the public to request that the government directs the disposal of unused or underused land, including vacant homes and garages, owned by public bodies. This right is little-known and little-used, with only one direction to dispose issued since 2014 (192 requests have been submitted under strand 2 and of these 145 were refused, 10 withdrawn, 9 are still pending, 27 were not a valid request). The right came in in 1980.
2. The government believes that reforming the Right To Contest and relaunching it as a new 'Right to Regenerate' could provide a quicker and easier route for individuals, businesses and organisations to identify, purchase and redevelop underused or empty land in their area. In turn, a strengthened right would support greater regeneration of brownfield land, boost housing supply and empower people to turn blights and empty spaces in their areas into more beautiful developments.
3. The government is recently consulted on the effectiveness of these requests as it considers reforms to make the process more efficient and more transparent. The deadline for responses was 13 March 2021 and the consultation document was available [here](#).¹

The current Right to Contest

4. Anyone can currently use Right to Contest to challenge Local Authorities about a site, as long as they believe that all the following apply:
 - The site is empty or under-used;
 - There are no plans to bring it back into use.
5. Nationally, most requests come in from members of the public rather than community groups or companies. The case is considered by MHCLG and the decision will be made on the basis of whether the land or property is in use or whether it is likely to be used in a suitable period of time.
6. The current reasons that Local Authorities give for not selling land under the Right to Contest is that the site is vital for operational purposes or other considerations will outweigh the potential better economic use. In the past refusals have largely arisen because the public body has a use/intended use for the land or it is allocated in the Local Plan.

¹ <https://www.gov.uk/government/consultations/right-to-regenerate-reform-of-the-right-to-contest>

What will be the implications of the Right to Regenerate for Norwich?

7. Strand 2 of the 'Right to Regenerate' only applies to land owned by Local Authorities and public bodies listed [here](#).² It does not apply to any privately owned land. It also only applies to unused or underused land. Currently there is no definition of what constitutes 'unused or underused land' and the consultation document asks if there is a requirement for this and what such definition should include.
8. There is no knowing what level of uptake there will be for the reformed Right to Regenerate both nationally or for Norwich itself. The sections below give an officer view as to the possible implications for Norwich City Council.

Resources

9. As part of the process there is likely to be a requirement for the Council to publish quarterly reports and where requests do come in then we will need to publish/publicise these.
10. Where requests are received (either informal or formal) this could potentially be quite resource intensive (especially if the Council needs to put together an argument to retain the land) and will need a quick turnaround.
11. Norwich City Council is likely to have the skills in house to accurately value and manage our assets but resources are stretched. As such Norwich City Council is of the view that new burdens introduced on Councils at this time is not helpful.

Towns Deal Fund

12. Norwich City Council has recently produced a Town Investment Plan which sets out a comprehensive package of eight schemes for investment totalling £26.13m. It is not considered that the Right to Regenerate is likely to have any implications on any of the projects.

Site allocations

13. Norwich City Council owns several sites which are currently allocated or proposed to be allocated within the GNLP. Only council owned sites that are underused or unused would be affected by the 'Right to Regenerate' and the level of vulnerability would be dependent upon timescales for bringing forward regeneration and development.

2

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/6068/1926839.pdf

Garage sites and vacant Council housing

14. The strengthened right would apply to unused or underused publicly owned social housing and garages. The level of vulnerability would depend upon their level of use and timescales for regeneration and the precise wording of the Right to Regeneration legislation.
15. The replacement homes program seeks to identify small HRA sites (typically garages or vacant/underused land) with development potential and work with a partner registered provider to develop the sites for affordable housing. Norwich City Council is due to go through a procurement process to establish an RP partner to do this over the next 5 years.

Asset management strategy and any other land holdings/premises

16. It is currently anticipated that the Asset Management Strategy will lead to a re-categorisation of all Norwich City Council owned land over time. This will assist in identifying any underutilised land and indeed some land may be identified for disposal (in which case Norwich City Council may welcome a community group offering to take it off our hands).
17. It will also identify land designated for redevelopment / regeneration with the aim of having a clear plan and timescale for redevelopment of such sites. This will help reduce our vulnerability to the Right to Regenerate but the potential implications will depend upon timescales for redevelopment.

Response to Consultation

18. Overall Norwich City Council does not welcome the proposed Right to Regenerate. Not only could this potentially be resource intensive at a time when council resources are stretched but it could also hinder the council from achieving longer term wider regeneration proposals.
19. Furthermore the proposal lacks any evidence base as to the extent of land that is currently unused or underused which are owned by Local Planning Authorities and it seems perverse that nothing is being done to unlock land in private ownership that is unused or underused in urban areas. Moreover the council has concerns that assets could be transferred from public to private ownership and then remain undeveloped unless if there is a condition which requires the new owner to redevelop the site within a certain time period.
20. Officers have identified some allocated and non-allocated sites that could be vulnerable although the level of uptake of the right is unknown. To minimise the risk, the council needs to have clear plans for any unused or underused land and a clear timescale for regeneration.
21. The consultation sets out 11 questions. The questions along with Norwich City Council's response are set out in Appendix 1 of this report.

Appendix 1 - Responses to consultation

Dear Sir/Madam

Thank you for consulting Norwich City Council on the Right to Regenerate Consultation. Please find attached Norwich City Council's response to the consultation questions. This response has been produced by officers and is due to be considered by the Council's Sustainable Development Panel on 18th March 2021. The Council reserves the right to amend aspects of its response following the meeting.

I would be grateful if you could acknowledge receipt of our response.

Kind regards

Joy Brown

Response to questions

Increasing the usefulness and effectiveness of the right

The government is seeking view on the usefulness of the right as well as potential reforms to increase effectiveness.

Q1 – Is the Right to Contest useful?

This right is little-known and little-used, with only one direction to dispose issued since 2014 (192 requests have been submitted under strand 2 and of these 145 were refused, 10 withdrawn, 9 are still pending, 27 were not a valid request).

Evidence would suggest that Right to Contest is not useful. It is little-known and used with only one direction to dispose issued nationally since 2014.

Q2 – Do you think there are any barriers and how can these be overcome?

Evidence shows that the Right to Contest legislation is not currently useful. Norwich City Council is of the view that the proposal to change to the 'Right to Regenerate' will not be helpful especially in terms of the Council carrying out its strategic role. Furthermore the proposal is unlikely to tackle the problem of unused and underused land, as unused and underused land in private ownership is much more of an issue in Norwich than land in public ownership. A lot more development land could be unlocked by effective Right to Regenerate applying to private land in urban areas that has been derelict or under used for significant time periods and it is this barrier that needs to be overcome.

Making it clearer when land is unused or underused

The government is considering publishing a definition of land that is unused or underused, to help guide people in making applications.

Q3 – Would a definition of unused or underused land be useful and what should such a definition include?

Norwich City Council does not support the Right to Regenerate however if it is brought forward then a definition of unused and underused land should be included. Norwich City Council would suggest that the definition includes the following:

- *Length of time a site needs to be unused or underused.*
- *What is meant by underused.*
- *Clarification as to whether the right applies to existing buildings or just vacant land*
- *If part of a site is used and part is vacant how would the right work? i.e. if you had a garage site and half of the garages were in used whilst the other half were vacant.*
- *If it does apply to buildings clarification as to whether the right would apply if some floors of a building are in use and other are vacant.*
- *Whether the right applies to small areas of open space/amenity land.*

Extending the scope of the right

The government is interested in views as to whether the right should be extended to include land owned by town and parish councils.

Q4 Should it be extended to land owned by town and parish Councils?

No comment

Land where a public body has an intended use

Many requests are refused as the public body indicates that it has an intended use for the land. This may be some sites are left unused or underused for some time until those plans materialise. The government is considering incentivising temporary uses by ordering sales where temporary uses cannot be identified.

Q5 – Should the government incentivise temporary use of unused land which has plans for longer term future use?

Norwich City Council does not support the Right to Regenerate proposal and does not agree with ordering sales where temporary uses cannot be identified. If the Council is required to find a temporary use for a site in order to retain it for longer term regeneration this could hinder the Council from achieving wider long term regeneration proposals. In particular, Norwich City Council has concerns that this could hinder site investigation. Furthermore, it could also be inappropriate on brownfield sites which have contamination as the costs of preparing the site for a temporary use could be disproportionate. In addition it could lead to issues when seeking to redevelop a site where the temporary use has to be removed (e.g. if the sites is used temporarily as a community garden), particularly if redevelopment plans are unpopular. There could also be potential issues in terms of the landlord and tenant act if temporary users gain more of an interest in the land or there could be legal issues around licenses.

A greater role for local authorities

The Right to Contest was designed as a last resort where listed public bodies have refused to engage with, or refused, a request to bring unused land into use. The government is inviting views as to whether it should require applicants making a request under the right to contact their local authority before making a request. The purpose would be for the applicant to find out more about the land and the likelihood of granting or agreeing to sale (a formal request may not then be needed).

Q6 – Should the government introduce a requirement for local authorities to be contacted before a request is made?

Norwich City Council does not support the Right to Regenerate proposal; however if it is brought in Norwich City Council would support the requirement for early discussions with the applicant as this may remove the need for a formal request altogether.

Presumption in favour of disposal

The government welcomes views on whether there should be a presumption in favour of disposal. i.e. disposals will be ordered unless there is a compelling reason not to do so.

Q7 – Should the government introduce a presumption in favour of disposal?

Norwich City Council does not support the Right to Regenerate and would not support a presumption in favour of disposal. The proposal could hinder the Council from achieving wider regeneration proposals and prejudice the future long term development of some of our sites.

Publicity and reporting

To improve transparency the government is considering placing requirements on local authorities such as

- Quarterly reports by a local authority officer on the number of preliminary enquiries made
- Requiring the display of physical and electronic publicity where a request has been submitted for the release of a site
- Requiring local authorities to publish all requests, together with their outcomes and reasoning, on their websites.

Q8 – Do you agree that the government should require these publicity measures where requests are made under the right?

Norwich City Council does not support the Right to Regenerate as it will place additional burden upon the Council at a time when resources are already stretched. Producing quarterly reports for example could be quite resource intensive and onerous. Therefore if the proposal is brought forward annual reporting would be more favourable and the Council would be willing to publicise any requests. However the consultation document fails to make clear what the purpose of publishing these

applications is. Is the public able to comment or are the publicity measures solely for notification purposes?

Right of first refusal

Successful requests lead to the land being placed on the open market. This can act as a significant disincentive for those putting in a request as community groups for example can struggle to raise finances quickly. The government is considering introducing a 'right of first refusal' to those who make the request recognising that they may need extra time to prepare a bid. This would usually be for market value and would be for a limited period of time.

Q9 – Should government offer a right of first refusal to the applicant as a condition of disposal?

Norwich City Council does not support the Right to Regenerate; however if it is brought forward then the Council would favour a right of first refusal but only where it is a community group that has put in the request.

Conditions attached to disposals

The SoS has the power to specify terms and conditions for disposal of the land. This could be for example that the sale could only be to someone with the intention to redevelop a site.

Q10 – Should the government impose conditions on the disposal of land?

Norwich City Council does not support the Right to Regenerate; however if brought in then the Council would strongly support the imposition of conditions. In particular it would be imperative that an applicant could demonstrate that there is a reasonable prospect of the site being redeveloped within a certain time period of the disposal (for example 2 years for commencement). The Council is extremely concerned that without such conditions assets could be transferred from public to private ownership and then remain undeveloped. It would then be more difficult to unlock development on land and assets which pass from public to private if they continue to be stalled.

Other suggestions

Q11 – Do you have any additional suggestions regarding reforms that could improve the effectiveness of the Right to Contest process?

Norwich City Council does not support the Right to Regenerate as the proposal lacks any evidence base as to the extent of land that is currently unused or underused which are owned by Local Authorities and it seems perverse that nothing is being done to unlock land in private ownership that is unused or underused in urban areas. Norwich City Council has concerns that assets could be transferred from public to private ownership and then remain undeveloped unless if there is a condition which requires the new owner to redevelop the site within a certain time period.

Land in private ownership is a much more significant problem in Norwich and one that Norwich City Council is seeking to address via a revolving fund as part of the towns deals package. However, CPO is time consuming, expensive and has risks

with it. A lot more development land could be unlock by effective Right to Regenerate applying to private land in urban areas that has been derelict or under used for significant time periods.

The Right to Regenerate would be more effective if community groups were able to identify, purchase and redevelop underused or empty land in their area which is currently in private ownership.

Report to	Sustainable Development Panel	Item
	18 March 2021	
Report of	Director of place	7
Subject	National Planning Policy Framework and National Model Design Code Consultation	

Purpose

To comments on Norwich City Council's response to the National Planning Policy Framework (NPPF) and National Model Design Code Consultation.

The Ministry of Housing, Communities and Local Government is currently consulting on changes to the National Planning Policy Framework and also on the National Model Design Code. Most of the proposed changes to the NPPF relate to policy on the quality of new development and respond to recommendations on the Building Better, Building Beautiful Commission. The government has however taken the opportunity to make a number of environment-related changes, including amendments on flood risk and climate change. There is also an update on the use of Article 4 directions.

The consultation was published on 30 January and the deadline for responses is 27 March 2021.

Recommendation

To comment on Norwich City Council's response to the National Planning Policy Framework and National Model Design Code Consultation.

Corporate and service priorities

The report helps to meet the corporate priority of great neighbourhoods, housing and environment and people living well, and the service plan priority to implement the local plan for the city.

Financial implications: None directly

Wards: All wards

Cabinet member: Councillor Stonard – Sustainable and inclusive growth

Contact officer(s)

Joy Brown, Senior Planner (Policy), 01603 989245
Ben Webster, Design, Conservation and Landscape manager, 01603 989621

Background documents

None

Report

Introduction

1. The government is proposing to make a number of changes to the National Planning Policy Framework (NPPF). Most of the changes relate to policy on the quality of new development and respond to the recommendations of the Building Better, Building Beautiful Commission. The government has however taken the opportunity to make a number of environment-related changes, including amendments on flood risk and climate change. There are also some minor factual changes and there is an update on the use of Article 4 directions.
2. The consultation also seeks views on the draft National Model Design Code which provides detailed guidance on the production of design codes, guides and policies to promote successful design.
3. A fuller review of the NPPF is likely in due course in order to reflect the wider reforms set out in the Planning for the Future consultation document.
4. The deadline for responses is 27 March 2021 and the consultation documents can be found [here](#).¹

Building Better, Building Beautiful Commission

5. The government convened the Building Better, Building Beautiful Commission with the aim of championing beauty in the built environment. The commission had three primary aims which are:
 - a) to promote better design and style of homes, villages, towns and high streets, to reflect what communities want, building on the knowledge and tradition of what they know works for their area
 - b) to explore how new settlements can be developed with greater community consent; and
 - c) to make the planning system work in support of better design and style, not against it.
6. The commission's report proposed three overall aims; ask for beauty, refuse ugliness and promote stewardship and made 45 propositions.

National Model Design Code

¹ <https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals>

7. The purpose of the National Model Design Code is to provide detailed guidance on the production of design codes, guides and policies to promote successful design. It expands on the ten characteristics of good design set out in the National Design Guide.
8. The design code is a set of illustrated design requirements that provides specific, detailed parameters for the physical development of a site or area. The government has published two new documents in draft that are intended to supplement the National Design Guide (updated Jan 2021): the National Model Design Code (NMDC) and Guidance Notes for Design Codes. The NMDC is intended to be used as a toolkit to guide local planning authorities on the design parameters and issues that need to be considered and tailored to their own context when producing design codes and guides as well as methods to capture and reflect the views of the local community from the outset and at each stage in the process. The government has indicated that where a local planning authority has not produced design codes the National Model Design Code will apply by default and the design codes will underpin a fast-track approval process for beautiful schemes.

Summary of proposed amendments to the NPPF

9. The consultation document sets out the main changes that are proposed to the framework. In summary these are as follows:
 - (a) implement policy changes in response to the Building Better, Building Beautiful Commission recommendation.
 - (b) make a number of changes to strengthen environmental policies – including those arising from the Defra review of flood risk
 - (c) include minor changes to clarify policy in order to address legal issues
 - (d) include changes to remove or amend out of date materials
 - (e) include an update to reflect a recent change made in a Written Ministerial Statement about retaining and explaining statues
 - (f) clarification on the use of Article 4 directions.

Response to Consultation

10. Overall Norwich City Council is supportive of the proposed changes to the NPPF. There are however two areas of concern which are as follows:
 - (a) In relation to article 4 directions it is proposed to amend the wording to only allow article 4 directions to be used where they are targeted and fully justified. One of the two options is that article 4 directions for the change of use to residential will be limited to situations where this is necessary to protect an interest of national significance. Furthermore it is proposed that it should apply to the smallest geographical area possible. Officers are concerned that this could prevent the introduction of an article 4 direction to prevent the uncontrolled loss of offices to residential across the city centre.

(b) Paragraph 64 has been amended to clarify that, where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership. This is to address confusion as to whether the 10% requirement applies to all units or the affordable housing contribution. Our concern is two-fold. Firstly the emerging GNLP sets out that 10% of affordable homes should be made available for affordable home ownership where this meets local needs. Therefore the GNLP policy will not be in accordance with the NPPF. Secondly in Norwich there is little need for affordable home ownership. There is a much greater need for social/affordable rent so it is important that we have flexibility in order for us to meet the needs of our communities.

11. With regard to the National Model Design Code, Norwich City Council agrees that design coding is a tool that should play a greater role in the planning process and that guidance on how to code is needed. The government has correctly identified design coding as an antidote to the tendency of local planning authorities to frame policies in words rather than maps, diagrams and images that can give greater clarity about the key characteristics of urban form that a development should feature. The government's loosening of planning control over changes of use makes shaping development form and targeting public investment in infrastructure and site development more important.
12. The National Model Design Code describes an approach to design coding across a whole town or city. Design coding has previously been applied mainly to large sites rather than whole settlements. This strategic urban design approach could bring a very useful dimension to spatial planning that visually illustrates the relationship between the aspects of the morphology of the settlement e.g. green infrastructure corridors, transport accessibility and development density. It would be interesting to explore how this could complement the process of producing the next iteration of the local plan.
13. Given the potential importance of design coding it is however an officer view that the documents published for consultation do not provide sufficiently clear guidance for a number of reasons. These are set out in question 15 of appendix 1.
14. The consultation sets out 16 questions. The full questions, along with an explanation of the proposed changes are set out in the [consultation document](#). Norwich City Council's proposed response are set out in appendix 1 of this report.

Appendix 1 - Responses to consultation questions

Chapter 2: Achieving sustainable development

Q1: Norwich City Council supports the proposed changes.

Chapter 3: Plan- making

Q2: Norwich City Council supports the proposed changes.

Chapter 4: Decision-making

Q3: Norwich City Council does not support the proposed changes to paragraph 53 of the NPPF in relation to Article 4 directions. It would appear that the government's intention is to significantly increase the ability for business premises to change to residential without the ability for Local Planning Authorities to consider all material planning matters and Norwich City Council feels that where there is evidence that this is causing harm at a local or regional level, they should be able to introduce an article 4 direction in order protect their towns and cities.

Norwich is intending to introduce an article 4 direction to prevent the uncontrolled loss of office to residential as recent evidence would suggest that the uncontrolled loss of office accommodation has left Norwich's office market in a fragile state ([Ramidus - 2020 - A Review of Office Accommodation in Norwich](#)). Protecting offices in Norwich will not be of national importance but their uncontrolled loss has had a significantly detrimental impact on Norwich's economy which is a regional centre within the East of England.

In terms of the two options whilst we would strongly object to the second one where this is limiting article 4 direction to situations where this is necessary in order to protect an interest of national significance, we would also have concerns regarding the first option as it is currently unclear as to what 'wholly unacceptable adverse impacts' would include.

We also have concerns in relation to restricting article 4 directions to the smallest geographical area possible. Whilst we acknowledge that article 4 directions should not extend further than necessary, it is the Local Planning Authority that is best placed to define the extent of a geographical area and in the case of Norwich's proposed article 4 direction, the evidence base would suggest that this should include the majority of the city centre.

Chapter 5: Delivering a wide choice of high quality homes

Q4: Norwich City Council does not support the proposed changes to paragraph 64. Within Norwich there is little need for affordable home ownership with the much greater need being for social/affordable rent. The requirement to have 10% of all homes as affordable home ownership will significantly impact on our ability to deliver the tenure that is much needed for our communities, especially where the level of affordable housing is challenged through the viability process. It is fundamental that there is flexibility in order for Local Planning Authorities to meet their local needs.

Norwich City Council supports the other changes to chapter 5.

Chapter 8: Promoting healthy and safe communities

Q5: Norwich City Council supports the proposed changes.

Chapter 9: Promoting sustainable transport

Q6: Norwich City Council supports the proposed changes.

Chapter 11: Making effective use of land

Q7: Norwich City Council supports the proposed changes.

Chapter 12: Achieving well-designed places

Q8: Norwich City Council supports the proposed changes and with regards to the National Model Design Code, Norwich City Council agrees that design coding is a tool that should play a greater role in the planning process. However Norwich City Council does have a number of concerns regarding the clarity of the guidance and also has significant concerns about having sufficient resources to produce such guides and codes at a time when Local Authority resources are being stretched. These are expanded upon in Q15.

Chapter 13: Protecting the Green Belt

Q9: No comment

Chapter 14: Meeting the challenges of climate change, flooding and coastal change

Q10: Norwich City Council supports the proposed changes.

Chapter 15: Conserving and enhancing the natural environment

Q11: Norwich City Council supports the proposed changes.

Chapter 16: Conserving and enhancing the historic environment

Q12: Norwich City Council would agree that Local Planning Authorities are the best placed to make decisions on the removal or alterations of historic statues, plaques and memorials.

Chapter 17: Facilitating the sustainable use of minerals

Q13: No comment

Annex 2: Glossary

Q14: Norwich City Council has no comments on the changes to the glossary; however we would suggest that beautiful is defined within the glossary.

National Model Design Code

Q15: Norwich City Council agrees that design coding is a tool that should play a greater role in the planning process and that guidance on how to code is needed. Norwich City Council also agrees that maps, diagrams and images can give greater clarity about the key characteristics of urban form that a development should feature.

Design coding has previously been applied mainly to large sites rather than whole settlements. However Norwich City Council agrees that applying the design coding approach to whole towns or cities could bring a very useful dimension to spatial planning that visually illustrates the relationship between the aspects of the morphology of the settlement e.g. green infrastructure corridors, transport accessibility and development density.

Norwich City Council agrees that design coding could potential be very useful and important; however we do have some concerns as we do not feel that the documents published for consultation provide sufficiently clear guidance, the reasons for which are set out below. Furthermore we have concerns about having sufficient resources to produce such guides and codes at a time when Local Authority resources are being stretched.

- 1) The National Model Design Code and guidance notes not explain when a coding approach is appropriate rather than another design tool, such as a masterplan, design guide or planning / development brief.
- 2) There is insufficient explanation of how coding at different geographical scales requires different techniques.
- 3) The guidance notes provide an elaboration of the content of the National Design Guide rather than a handbook for coding.
- 4) There is a confusion relationship between the National Model Design Code and the Guidance Notes – these should be combined into one document.
- 5) No extracts from actual coding document are included within the documents so the reader is left in ignorance about what a successful design code document might look like.
- 6) The Planning White Paper sees coding as operating within the context of a zonal planning system where a code would provide the regulatory parameters for what is allowed in different zoned areas. For example, legislation would stipulate that permission in principle would only be granted in areas zoned for growth if a masterplan and design code were to be produced. It is therefore confusing that the design coding documents do not refer to this and several other aspects of the White Paper, such as how the White Paper proposals for machine-readable data on coding to be produced in a standardised format. This might be because it would be seen to pre-empt decisions on whether the proposals in the White Paper will be implements.
- 7) The documents need to be clear about what should feature in a local plan and what should be left to a code. There are occasional references to this, such as parking standards, but no systematic explanation of what sits where.
- 8) The consultation document sets out that where a local planning authority has not produced design codes the National Model Design Code will apply by default. However, this calls into question the purpose of the document –

is it a Design Code that can be used to guide and regulate the form of development nationwide or a document that explains how to do design coding?

- 9) Design codes are expected to be based on a design vocabulary that can be empirically demonstrated as popular. Without this evidence they will have little or no weight in the planning process. Community engagement is therefore key. However community engagement will be a big challenge because design codes are technical documents that are likely to only interest a small proportion of people. Getting the technique of community engagement right will be vital but the section on this topic at the end of the Guidance Notes is particularly weak.

Public Sector Equality Duty

Q16: No comment