

## Cabinet

**Date:** Wednesday, 14 October 2020

**Time:** 16:30

**Venue:** Remote, [Venue Address]

### Committee members:

#### Councillors:

Waters (chair)  
Harris (vice chair)  
Davis  
Jones  
Kendrick  
Maguire  
Packer  
Stonard

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## Information for members of the public

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## Agenda

### Page nos

#### 1 Apologies

To receive apologies for absence

#### 2 Declarations of interest

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

#### 3 Public questions/petitions

To receive questions / petitions from the public.

Please note that all questions must be received by the committee officer detailed on the front of the agenda by **10am on Friday 9 October 2020**.

Petitions must be received by the committee officer detailed on the front of the agenda by **10am on Monday 12 October 2020**.

**For guidance on submitting public questions or petitions please see appendix 1 of the council's constitution.**

#### 4 Minutes

5 - 12

To agree the accuracy of the minutes of the meeting held on 9 September 2020.

#### 5 Temporary revision to the council's Statement of Community Involvement to reflect Covid-19 restrictions

13 - 56

**Purpose:** To consider the proposed updates to the Statement of Community Involvement.

#### 6 Council response to Planning White Paper consultation

57 - 80

**Purpose:** To consider the current government consultation on the Planning White Paper and the proposed consultation response, and the now closed consultation 'Changes to the current planning system'.

#### 7 Scrutiny committee recommendations

81 - 90

**Purpose:** To consider the recommendations from the scrutiny committee meeting held virtually on 17 September 2020.

#### 8 Home improvement team and disabled adaptations service - key

91 - 102

**decision**

**Purpose:** To consider the home improvements work provided by Norwich City Council and to seek approval to enhance the service for council tenants as part of a tenure neutral approach.

- |            |   |           |
|------------|---|-----------|
| <b>9</b>   | <b>To award a contract for solar thermal water heating to social housing properties - key decision</b><br><b>Purpose:</b> To seek approval to award a contract for solar thermal water heating to social housing properties.  | 103 - 108 |
| <br>       |   |           |
| <b>10</b>  | <b>Vehicle lease and future contract awards for Norwich City Services Limited - key decision</b><br><b>Purpose:</b> To seek approval to award a vehicle lease contract for Norwich City Services Limited and to delegate future contract awards.                            | 109 - 116 |
| <br>       |   |           |
| <b>11</b>  | <b>The award of contract for IT contract renewal - Outsystems (digital development platform) - key decision</b><br><b>Purpose:</b> To seek approval for the award of a new contract for the provision of a digital development platform to replace the current LGSS service | 117 - 124 |
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| <b>12</b>  | <b>The award of contract for cash collections - key decision</b><br><b>Purpose:</b> To seek approval to award a contract for Cash collections.  | 125 - 132 |
| <br>       |   |           |
| <b>13</b>  | <b>Managing assets (Housing) - key decision</b><br><b>Purpose:</b> To consider the disposal of the land detailed in this report.  | 133 - 142 |
| <br>       |   |           |
| <b>*14</b> | <b>Exclusion of the public</b><br>Consideration of exclusion of the public.   |           |

## **EXEMPT ITEMS:**

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

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

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

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### **\*15 Managing assets (Housing) - exempt appendix**

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

Date of publication: **Friday, 09 October 2020**

**Cabinet****16:30 to 18:20****9 September 2020**

Present: Councillors Waters (chair), Harris (vice chair), Jones, Kendrick, Maguire, Packer and Stonard.

Apologies Councillors Davis and Wright

Also present: Councillor Bogelein

**1. Public Questions/Petitions**

One public question had been received.

Abigail Murray and Fiona Leggo asked the cabinet member for safe and sustainable city environment the following question:

“As a resident of Rosary Road we have for some years suffered anti social behaviour from the street prostitutes. Even during these times of Covid we are still experiencing regular disturbances. We are frequently woken up by shouting and screaming all night long. Neighbours and friends are harassed on the street and while parking their cars by the prostitutes soliciting them. We often find used condoms and needles in the area. We have also reported human faeces in Old Library Wood and in our back alley.

These local problems are documented in emails to councillors and the police and have been raised at SNAP meetings as well as by this council’s scrutiny committee, which previously referred the matter to the cabinet. I have also reported them via the city council website and to the police.

We are aware that a PSPO renewal is required in autumn 2020 and that this renewal offers a good opportunity for the area covered by a PSPO to be extended and for additional types of anti-social behaviour to be covered. We would like the areas around Rosary Road, Old Library Wood, King Street and Mousehold Street to be covered by PSPOs focusing on street prostitution and kerb crawlers. We know that this PSPO extension is supported by the Thorpe Hamlet ward councillors - and we thank them for their help so far. Other councillors who have attended SNAP meetings at which a PSPO extension has been discussed will also be aware of the strength of feeling from residents on this subject. The police also appear to have shown some support for the idea.

Recommendations from the scrutiny committee were discussed at the cabinet meeting on 11 March 2020 where senior officers said that PSPOs could be ‘useful’ and ‘effective’. We were disappointed not to receive further support at that time.

We are sure that cabinet members must be just as keen as we are to eliminate this type of anti- social behaviour, and, therefore, we ask for a commitment to supporting PSPOs in the east of Norwich to help combat these activities which make life so difficult for residents.”

Councillor Maguire, cabinet member for safe and sustainable city environment, gave the following reply:

“Thank you for your question Ms Murray and Ms Leggo. This comes at a most apposite time when everyone of us is reviewing our safety in the climate of the pandemic.

I am pleased to have the opportunity to advise and explain the action which the council has taken and the proposals to renewal of the existing PSPOs which are currently being reviewed.

The public space protection orders which are currently being reviewed are for the management of dog fouling across the city and the management of alcohol and associated anti-social behaviour in the city centre.

The council has been working with the police to address the matters which you raise and part of this is using the existing legal powers available to the police and the council to address and prevent anti-social behaviour.

The supporting evidence provided by the police for the management of alcohol and associated anti-social behaviour is being reviewed together with any other areas that should be considered. Any designation of a PSPO requires a clear pattern of evidence and for it to be seen to be proportionate for the issue it is setting out to resolve.

The issue of street sex working is complex and any additional enforcement powers deployed does require a response to help support those street sex workers out of the business otherwise it risks displacing the issue rather than resolving it through an enforcement approach alone. The reference to a PSPO targeting kerb crawlers would I believe create the same issue and my understanding is that this has been used in the London Borough of Redbridge, and officers are keeping an eye on what it is achieving.

Most of what I believe is undertaken in Redbridge is to engage with kerb crawlers to explain why they are there and what the consequence of engaging with prostitutes will be, issuing fixed penalty notices, and engaging the women involved in prostitution to encourage exit.

Redbridge does appear to have an outreach support service which is not available in Norwich, which in Norfolk would be a service commissioned by Norfolk county council as a public health function.

Discussions with the constabulary at a senior level is that any further enforcement requires at the same time, a solution focussed on supporting the women. At this time they do not support a PSPO focussing on street sex working.

It is important to note that the police already have a variety of powers to deal with kerb crawling as a criminal matter and adding a PSPO for tackling kerb crawling I don't believe adds anything to resolve the problems in itself.

This year officers have discussed in detail the scope of a new PSPO and the addition of extra powers which may assist the police in managing anti-social behaviour.

It is important though, that the solutions include the necessary encouragement and support to change the sex workers lifestyle, and although this work takes time it has been shown to have been successful in addressing the problems that arise.

Dealing with the issue does require a multi-agency response covering drug and alcohol services, housing, probation, and policing. I have, therefore, asked officers to take forward conversations with partners to seek a solution or solutions to the issues you are experiencing which are a result of street sex working."

By way of a supplementary question, Abigail Murray asked whether with the behaviour of a small number of individuals having such a detrimental effect on people's lives, would the cabinet member agree that a PSPO would be a proportionate measure to tackle the problem and what additional help could the council give to residents.

Councillor Maguire, cabinet member for safe and sustainable city environment said that the council would be guided by evidence, the police and other partners around the issue. The activities were criminal activities and the police had additional powers around this which were used and the council would work with them. Local government had around a forty percent funding cut over the last ten years. The city council had statutory responsibilities but did more than just these as it was driven by public safety. The question should also be posed to a number of agencies of which the city council was only one.

## **2. Declarations of interest**

There were no declarations of interest.

## **3. Minutes**

**RESOLVED** to agree the accuracy of the minutes of the meeting held on 29 July 2020.

## **4. Greater Norwich Homelessness Strategy 2020-25**

Councillor Harris, deputy leader and cabinet member for social housing presented the report.

The council had always worked hard on prevention of homelessness and this work had started in 2018 with the creation of the Greater Norwich Homelessness Forum, which worked with a variety of stakeholders. For a number of years, the council had produced a Rough Sleeping Strategy to give ownership of the work around this in the city. Agencies working together to support people could help residents to take control of their circumstances.

She highlighted the four priorities in the strategy along with the detailed actions which sat under each of them. The strategy predicted a likely increase in homelessness due to a wide range of factors and it was important that the document stayed relevant. The strategy would be reviewed annually by each of the Greater Norwich councils and would be published online.

Members thanks the officers involved for their work on the strategy.

The head of neighbourhood housing said that the list of partners showed the amount of work being done to produce the outcomes needed. He invited members to see the preventative work being undertaken by officers.

Councillor Bogelein asked if the council had volunteered to be part of a random control trial by the University of Cardiff and the Centre for Homelessness Impact. The head of neighbourhood housing said that he was not aware that the council had volunteered but he would look into it and see if it was something the council would want to do.

**RESOLVED** to approve the new Greater Norwich Homelessness Strategy 2020-25

## **5. Non-commercial debt policy**

Councillor Kendrick, cabinet member for resources, presented the report. He said that the council had a duty to be considerate to those residents in financial difficulties.

Councillor Harris, deputy leader and cabinet member for social housing, highlighted the work of the council's money advisors who made a real difference to council tenants. The sixty day 'breathing space' was welcomed as well as the section in the policy on vulnerable people. She said that when officers were looking at debts, they worked across the council to ensure a consistent and fair approach.

The financial inclusion officer thanked colleague from across the council for their involvement in shaping the policy and highlighted the inclusion of the standard financial statement, the section on vulnerable residents and the 'breathing space'.

Councillor Bogelein said that the scrutiny committee had asked for an easy read sheet to be included in letters to those in debt to improve communication, and asked what progress had been made on this. The financial inclusion officer said that work was being undertaken around rent statements to simplify the information and the communications team had been involved in work on letters from the revenue and benefits teams to simplify these. The director of strategy, communications and culture added that work had been done with the UEA on the phrasing of corporate letters.

**RESOLVED** to approve the revised non-commercial debt policy.

## **6. Quarter one Corporate Performance Report for 2020-21**

Councillor Waters, leader of the council presented the report. The new dashboard showed council performance against the three corporate priorities. He highlighted the new format for the data which could be accessed online by both councillors and

members of the public. He gave an overview of the measures within the report and reminded members that some of the work around these measures had been impacted by the covid-19 pandemic.

Councillor Maguire referred to the residual waste and recycling collections measure and said that partners had been fantastic in keeping service levels up during the lockdown period. There would need to be work on individual behaviours in order to have a positive impact on those measures.

The senior strategy officer said that the new dashboard should be more interactive and encouraged feedback on the new format. Some older data was still being loaded into the software so it was still in the process of being updated.

The chief executive said that the new way of presenting the data was much clearer. He gave assurances to members that there was a focus on performance measures at officer level and he wanted to drill down into some of these. Service reviews were being undertaken and performance data would form part of these reviews.

Councillor Bogelein referred to the Green Homes Grant and asked if the council would promote this or benefit from the delivery scheme. Councillor Waters, leader of the council, agreed to find out the information and forward this to Councillor Bogelein.

**RESOLVED** to note the quarter one corporate performance report for 2020-21

## **7. Quarter one revenue and capital budget monitoring 2020-21**

Councillor Kendrick, cabinet member for resources presented the report. He said that an overspend of £1.3 million was forecast due to the financial pressures of the covid-19 pandemic and these financial pressures would remain as the pandemic continued. A review of the capital programme would be undertaken to assess the impact of covid-19 on individual projects.

Councillor Bogelein asked what work was being undertaken to assess the viability of commercial investments, including the airport industrial estate. The interim chief finance and section 151 officer said that there was a lot of work on active management of the council's portfolio and the council was being proactive in communicating with tenants to understand their position.

The chief executive said that there was a huge amount of work being done with commercial tenants. When the council invested in a commercial asset, a contingency was set aside to guard against risk.

The director of place said that a wider review of the council's Commercial Property Investment Strategy was planned as part of the Covid-19 Recovery Plan. Regarding the airport industrial estate, work had started with colleagues at Norfolk County Council to consider the asset.

**RESOLVED** to:

- 1) note the forecast outturn for 2020-21 for the General Fund, HRA and capital programme; and

- 2) note the consequential balance of the General Fund and Housing Revenue Account balances.

## **8. Treasury management full year review 2019-20**

Councillor Kendrick, cabinet member for resources, presented the report.

Councillor Bogelein asked what impact covid-19 would have on the affordability ratio going forward, in particular for the HRA. The interim chief finance and section 151 officer said whilst there might be a short term drop in income, the HRA was assessed through the 60 year business plan and over those timescales there would not be an impact on the affordability of the borrowing it held.

**RESOLVED** to -:

- 1) Approve the treasury management policy statement; and
- 2) Recommend that council note the report and the treasury activity for the year to 31 March 2020.

## **9. Write off of non-recoverable national non-domestic rate debts.**

Councillor Kendrick, cabinet member for resources, presented the report. The council worked to recover debts but it was not always possible.

**RESOLVED** to approve the write off of £86,488.87 of non-recoverable national non-domestic rate debt which is now believed to be irrecoverable and is covered within the bad debt provision for 2020-21.

## **10. The award of contract for the IDOX (uniform system) – Key Decision**

Councillor Kendrick, cabinet member for resources presented the report. The system would be reviewed under a wider review of IT systems.

**RESOLVED** to award a 3 year contract to enable uninterrupted services for planning, licensing, environmental health and the Norwich Local Land and Property Gazetteer (LLPG).

## **11. To award a contract for gas servicing and repairs to housing heating systems**

Councillor Harris, deputy leader and cabinet member for social housing presented the report. She highlighted the cost implications and it was noted that this would include a saving on current rates. The award of the contract would go to a Norwich based firm and would ensure continuity in the delivery of the service.

**RESOLVED** to award the contract for the housing heating systems servicing and repairs to Gasway Services Ltd.

## **12. City council leisure provision – Key decision**

Councillor Packer, cabinet member for health and wellbeing presented the report. Residents had been accessing parks for health benefits during the lockdown but had missed using the leisure centre. The centre offered health and wellbeing benefits and also employed around seventy staff.

The director of strategy, communications and culture said that other councils around the country were in a similar position and Norwich City Council had been liaising with these authorities.

**RESOLVED** to pay Places Leisure negotiated costs associated with the enforced closure of Riverside Leisure Centre and estimated recovery costs in this financial year, subject to an open book reconciliation.

## **13. Exclusion of the Public**

**RESOLVED** to exclude the public from the meeting during consideration of items \*14 to \*16 (below) on the grounds contained in the relevant paragraphs of Schedule 12A of the Local Government Act 1972 (as amended).

### **\*14. City council leisure provision – exempt appendix – Key decision (para 3)**

**RESOLVED** to note the exempt appendix.

### **\*15. Norwich provision market – Key decision (para 3)**

Councillor Packer, cabinet member for health and wellbeing presented the report. Officers and the local MP had been in regular contact with the market traders. The option outlined in the report was the most appropriate for the current situation.

**RESOLVED** to approve the financial support to traders at Norwich Market as outlined in the report.

### **\*16. Senior management structure (para 4)**

(The council's corporate leadership team and the monitoring officer left the meeting for this item).

Councillor Waters, leader of the council presented the report.

Following discussion it was:-

**RESOLVED** to approve the recommendations as set out in the report.

.CHAIR



<b>Report to</b>	Cabinet	<b>Item</b>
	14 October 2020	
<b>Report of</b>	Director of place	
<b>Subject</b>	Temporary revision to the council's Statement of Community Involvement (SCI) to reflect Covid-19 restrictions	<b>5</b>

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## **Purpose**

To consider the proposed updates to the Statement of Community Involvement. The proposed updates are temporary and are in direct response to the impacts of the coronavirus pandemic (Covid-19) upon our ability to engage with the community using some methods, such as public meetings. This is as a result of the social distancing guidance which is issued by the government.

## **Recommendation**

To adopt the updated temporary Statement of Community Involvement.

## **Corporate and service priorities**

The report helps to meet the corporate priorities great neighbourhoods, housing and environment, and people living well.

## **Financial implications**

None.

**Ward/s:** All Wards

**Cabinet member:** Councillor Stonard - Sustainable and inclusive growth

## **Contact officers**

Katherine Brumpton, Planner 01603 989249

Judith Davison, Planning policy team leader 01603 989314

## **Background documents**

None

# Report

## Context

1. Statements of Community Involvement (SCIs) are codes of practice for setting out how councils intend to involve people in planning decisions. They cover decisions in relation to both planning policy and planning applications (development management). SCIs are required under section 18 of the Planning and Compulsory Act 2004. Norwich City Councils latest SCI was adopted in November 2016, and is published on our website here; [https://www.norwich.gov.uk/downloads/file/2269/statement\\_of\\_community\\_involvement](https://www.norwich.gov.uk/downloads/file/2269/statement_of_community_involvement) .
2. The coronavirus outbreak (Covid-19) has impacted on how we can currently engage with the community, with several methods in the 2016 SCI not possible under the current government guidelines on social distancing.
3. New planning guidance (updates to the National Planning Policy Guidance<sup>1</sup>) has been published for Statement of Community Involvement policies which allows local planning authorities to review and update them accordingly. This guidance allows for temporary alterations to be made where the current policy cannot be complied with due to the current social distancing restrictions in response to the coronavirus outbreak. The guidance advises that temporary revisions to SCIs made under this guidance do not need to be publicly consulted on.
4. The proposed changes to the SCI are anticipated to be temporary, and are proposed to ensure the safety of our communities, key partners, businesses and council staff.
5. Also of note is an amendment to the Town and Country Planning (Local Planning) (England) Regulations 2012 (S.I. 2012/767) (“the 2012 Regulations”) reference 2020 No.731<sup>2</sup>. This amendment removes the requirement for local planning authorities to have certain documents available for inspection at a premise and to provide hard copies on request. These measures are temporary and apply until 31 December 2020. Policy documents will currently be considered made when they are made available on the local planning authority’s website.
6. A more thorough review of the SCI is anticipated next year. Current guidance requires SCIs to be updated every 5 years, and so a review is due by November 2021. The proposed temporary revision focuses on the impact of the virus only, and does not extend beyond this remit. The recently published Planning for the Future White Paper published by the Ministry of Housing, Communities & Local Government (MHCLG) has proposed significant changes to the way in which communities are consulted in relation to planning, placing more emphasis on the planning policy stage. At this point it is also unclear how the White Paper will impact the council’s planning policies in the short to medium term, notably the draft Greater Norwich Local

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<sup>1</sup> <https://www.gov.uk/guidance/plan-making# covid19>

<sup>2</sup> <https://www.legislation.gov.uk/ukxi/2020/731/made>

Plan. It is therefore recommended that a temporary update to the SCI is adopted with a future revision addressing the wider changes to planning.

7. The Sustainable Development Panel considered a report on the proposed temp SCI on 1 October and endorsed the proposed temporary changes.

### **Proposed changes**

8. The current SCI has three main sections; introduction, consultations on planning policy documents, and consultations on planning applications (development management). All three sections have been amended. The proposed changes in each section have been summarised below.

#### *Introduction*

9. Within the need for review section the additional paragraphs outline why the temporary amendments are proposed and provides some background.
10. Equality is a statutory duty under The Equality Act 2010 and for the public sector this means that public bodies have to consider all individuals when carrying out their day to day work, such as shaping policies, delivering services and in relation to their employees. Some individuals may be disproportionately impacted by the restrictions imposed by the social distancing guidance. An additional paragraph in the section titled "The Council's commitment to equality" acknowledges this, and identifies that the council will assist any individual where a need is identified.
11. The Role of Councillors section includes a new paragraph which explains that planning applications committee meetings are currently being held virtually, as permitted under the Coronavirus Act 2020. The meetings are available live on the Council's Youtube channel. This situation will continue to be reviewed, and alternatives such as hybrid meetings may be considered (where some attendees are in-person and some are remote).

#### *Consultations on planning policy documents*

12. The Consultation methods sub-section has been amended, advising that not all of the consultation methods listed maybe possible at present due to the coronavirus pandemic. In particular hard copies and face to face events are unlikely to be readily available, dependent on the current government guidance.
13. Hard copies of consultation documents are usually available at the Council's office and at the Millennium library. Focus group sessions, public meetings and presentations/exhibitions are often held throughout the consultation process. The proposed amendments allow these to go ahead where possible and subject to social distancing guidelines. At the time of writing neither the Council's offices nor the Millennium library are open to the public as widely as they were prior to the pandemic.

#### *Consultations on planning applications*

14. A section has been added advising that not all of the consultation methods listed maybe possible at present due to the coronavirus pandemic. In

particular hard copies of planning applications committee papers are unlikely to be readily available, and face to face events such as the planning applications committee itself may be held remotely instead.

15. Details on the planning applications committee are repeated in this section from the Role of the Councillors section above.
16. The SCI strongly encourages applicants to consult the local community before submitting a planning application, in particular for housing developments of 10 or more and for any development with a floor area of 1,000 square metres or above. Applicants are also likely to be impacted by the government's social distancing guidance and are now advised to consider alternatives methods and explain their approach.
17. The alterations ensure that consultation methods that maybe impacted by the coronavirus pandemic can be varied or removed, dependent upon the current government guidance in relation to the coronavirus pandemic.

## **Conclusion**

18. The proposed alterations to the SCI will allow the document to respond to the current pandemic and to set out how the community will be consulted by their local planning authority appropriately at this time. The measures are temporary, and whilst it is hoped that any change to the government guidance on social distancing results in a relaxation, the wording used for the amendments has been deliberate in allowing for the guidance to move either way.

## Integrated impact assessment



**NORWICH**  
City Council

The IIA should assess **the impact of the recommendation** being made by the report  
Detailed guidance to help with the completion of the assessment can be found [here](#). Delete this row after completion

### Report author to complete

<b>Committee:</b>	Cabinet
<b>Committee date:</b>	14 October 2020
<b>Director / Head of service</b>	Graham Nelson
<b>Report subject:</b>	Statement of Community Involvement update
<b>Date assessed:</b>	25 September 2020

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial inclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The proposed changes to the SCI ensures that the document is up to date in the current coronavirus pandemic and communities can continue to have a say on planning matters, despite the government guidance on social distancing.

	Impact			
Equality and diversity (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Relations between groups (cohesion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Eliminating discrimination & harassment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advancing equality of opportunity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The proposed amendments include an acknowledgement that there may be groups that are disproportionately impacted by the current restrictions in place in relation to social distancing. The revised document promotes flexibility where this could occur, aiming to provide equal opportunities for all.
Environmental (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Natural and built environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Through effective community involvement both planning policies and planning applications can be impacted as a direct result. This can lead to both a natural and built environment that better responds to the requirements of the community.
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
Energy and climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(Please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Risk management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Recommendations from impact assessment	
<b>Positive</b>	
<p>Some impacts have been identified as positive.</p> <p>The proposed changes to the SCI ensures that the document is up to date in the current coronavirus pandemic and communities can continue to have a say on planning matters, despite the government guidance on social distancing.</p>	
<b>Negative</b>	
N/A	
<b>Neutral</b>	
<p>Majority of impacts are neutral.</p> <p>Through effective community involvement both planning policies and planning applications can be impacted as a direct result. This can lead to both a natural and built environment that better responds to the requirements of the community.</p>	

<b>Issues</b>
N/A



**NORWICH**  
City Council

# **Statement of Community Involvement for Norwich**

A code of practice for involving the community in planning issues

November 2016 (amended September 2020)

## Foreword

The coronavirus outbreak (Covid-19) has impacted on how we can currently engage with the community, with several methods in the 2016 SCI not possible under the current government guidelines on social distancing. At the time of writing the government guidelines restrict some peoples' movement and some workplaces remain closed. Places where hard copies of documents were routinely placed are still impacted from the guidelines, with local authority offices largely closed to the public and Norfolk libraries only partially reopened. Government guidelines also advise that the virus can exist on surfaces, such as hard copies of documents.

The impact of the coronavirus, and the advice from the government therefore makes the physical inspection of documents more difficult for the following reasons;

- Restrictions on movements may prevent people visiting the location of the documents;
- May be impossible to provide an address for the provision of a hard copy due to closures of offices/libraries; and
- Concerns regarding the public sharing hard copies.

New planning guidance (updates to the National Planning Policy Guidance<sup>1</sup>) has been published for Statement of Community Involvement (SCI) policies which allows local planning authorities to review and update them accordingly. This guidance allows for temporary alterations to be made where the current policy cannot be complied with due to the current social distancing restrictions in response to the coronavirus outbreak. The guidance advises that temporary revisions to SCIs made under this guidance do not need to be publicly consulted on.

The SCI published in November 2016 has been amended, as below, to allow for the current restrictions. The changes to the SCI are anticipated to be temporary and have been limited to those required as a direct result of the coronavirus pandemic. The changes are proposed to ensure the safety of our communities, key partners, businesses and council staff.

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# 1. Introduction

## Why we are preparing the Statement of Community Involvement

1. The city council is always looking for ways for the community to become more involved in its plan making and decision taking. We want to encourage more people to be involved and to make that as easy as possible. We hope that your local knowledge will help to make sure that development in the city benefits everyone whilst protecting the special qualities of the city. How we will ensure that you are part of this process is set out in this statement.
2. Under Section 18 of the Planning and Compulsory Purchase Act 2004, all local planning authorities in England and Wales must prepare a Statement of community involvement (SCI) and must carry out planning consultations in accordance with it. The SCI is a 'code of practice' setting out how the council intends to involve people in planning decisions. This can include both decisions about planning policy (plan-making) and decisions on planning applications.
3. This is the fifth edition of the Statement of community involvement. It temporarily replaces the version published in November 2016.

## Need for review

4. Due to the current coronavirus (Covid-19) outbreak the government has issued guidance regarding social distancing, some of which impacts the range of methods of community involvement available.
5. New planning guidance has been published for Statement of Community Involvement policies which allow local planning authorities to review and update them accordingly. This guidance allows for alterations to be made where the current policy cannot be complied with due to the current social distancing restrictions in response to the coronavirus outbreak. The guidance can be found here; <https://www.gov.uk/guidance/plan-making#covid19>
6. The changes to this document, which are as a result of social distancing requirements, are anticipated to only be temporary. The changes are made to ensure the safety of our communities, key partners, businesses and council staff.
7. SCIs are required to be updated every 5 years. It is anticipated that a more thorough review of this document will occur next year, in 2021.
8. Under the national planning system, the council must prepare a local plan, which will guide the city's development and growth over the next 15 to 20 years. With an up to date local plan in place, it is clear how the council intends to provide for new housing and employment in the city, how much development will be planned for and where it will go. A local plan also sets out clearly what will and what will not be allowed in certain areas and which areas must be protected from development altogether. Local plans must be reviewed regularly to remain up to date and respond to changes in local circumstances. Plans must also be consistent with national

planning policy and guidance. If this guidance changes, local planning policy usually needs to change too.

9. Since we published the last Statement of community involvement in 2013, there have been a number of important changes to the national planning system which will affect how we prepare and consult on plans and proposals in future. Further changes in national rules are expected in coming years, particularly as a result of measures announced in the forthcoming Housing and Planning Act.
10. In relation to plan-making, the government has made it clear that it expects councils to prepare local plans and put them in place as quickly as possible. Recent government announcements suggest that councils which do not already have up to date local plans will be expected to prepare and adopt them (that is, complete the legal process to bring them into force) by the end of 2017. Councils which fail to produce timely local plans might also face possible sanctions and financial penalties. Councils that have adopted their plans recently must keep them up to date and review them as soon as practicable. There will also be an increased role for neighbourhood plans prepared directly by local communities.
11. Although Norwich's main local plan documents were adopted as recently as December 2014, the overall planning strategy for the Norwich area, the Joint core strategy for Broadland, Norwich and South Norfolk, is becoming out of date and a new local plan needs to be prepared to manage and shape longer term growth and development. At the same time, there is a need for an overall planning framework to establish future needs and set targets for housing and jobs in Norfolk and ensure that new local plans for individual districts are consistent with those targets.
12. Accordingly, in partnership with Broadland and South Norfolk Councils and Norfolk county council, we are starting work on a new Greater Norwich Local Plan that will set out a development strategy for the wider Norwich area between now and 2036, as well as a broader Norfolk Strategic Framework to set overall planning targets.
13. In relation to planning applications, the government has made further changes in national planning rules which mean that more kinds of development can be carried out and more kinds of premises can change their use without planning permission – called permitted development. As part of the drive to encourage more housebuilding, the government will also be changing and simplifying the planning process for housing, granting automatic “permission in principle” for new housing development on previously developed sites which councils have listed as suitable. Local plans will also have to identify land for low cost starter homes on all suitable housing development sites.
14. During this period of rapid change, we must strike a careful balance between meeting our obligations to government to prepare plans and decide applications as quickly as possible, and making sure that local people still have a meaningful opportunity to comment on and influence planning policies and proposals. In order to meet government directives we will need to review some of the consultation arrangements for plan-

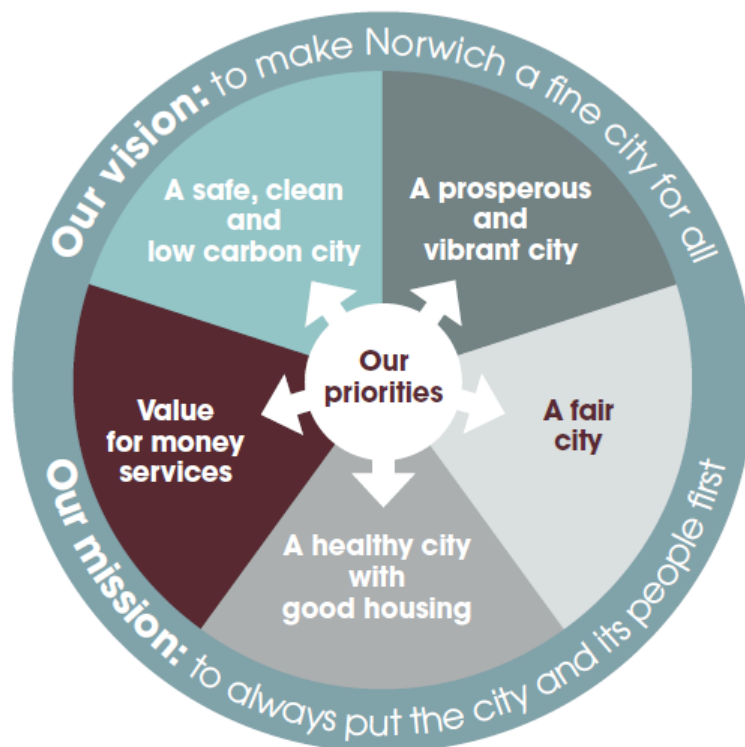
making in the 2013 Statement of Community Involvement, particularly to streamline certain procedures and (where this is unavoidably necessary) to reduce the length of time we consult on key documents.

15. Taken together, the changes in the planning system will inevitably affect the way that local plans are prepared and how planning applications are made and dealt with. This means that the way we involve local people in the planning process also needs to change. In cases where no planning application is needed, the city council cannot always let people know about all development which is happening in their area. In a very small number of cases, the national rules have been tightened, for example changing a shop to a betting shop now needs permission where it did not before, as does changing the use of or demolishing a local pub which is registered as an Asset of Community Value. The permitted development rule changes are designed to speed up the planning process, get development going and make smaller scale building projects and minor changes easier. But they will sometimes mean that local people will have less opportunity than before to have their say.

### **Planning and community Involvement**

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

## Council priorities



### Our core values

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

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

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

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

### The Compact: Code of practice on involvement

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

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

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

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

21. The council has a commitment to equality which is a statutory duty under the Equality Act (2010). This is particularly relevant to planning which has a role to play in promoting equality of opportunity and cohesion by considering the needs of the community. The council recognises that equality of opportunity in practice includes ensuring that vulnerable or disadvantaged groups have their voices heard and their needs considered. This statement supports that objective through providing guidance on how to get people involved. The impact of planning activities and decisions will be assessed in order to ensure that there are no unintended negative impacts on vulnerable or disadvantaged groups. The assessments will focus on the six protected characteristics of race, gender, disability, age, sexual orientation and religion or belief, but will also consider the wider implications of socio-economic inequalities on community cohesion. This is normally carried out through an Equality Impact Assessment (EqIA) which takes place at the beginning of the plan-making process.
22. It is recognised that there may unfortunately be some impacts upon vulnerable or disadvantaged groups as a result of the temporary changes proposed to the SCI. However these changes are made in direct response to the government's guidelines on social distancing as a result of the coronavirus outbreak and are intended to ensure the safety of our communities, key partners, businesses and council staff, to include any vulnerable or disadvantaged groups. As such the council will endeavour to be as flexible as practicable during this time of social distancing to reduce any impact upon vulnerable or disadvantaged groups. Individuals or groups who would benefit from further assistance, such as hard copies of papers, should contact the relevant officer.

### **The role of councillors**

23. Councillors have three roles: as decision makers, as community representatives and as communicators to exchange and share information and discuss the issues and concerns of local electors with council officers and other stakeholders. Members of the public can make their views known to ward councillors, the relevant council executive member/portfolio holder, or at planning applications committee in a number of ways; by letter, email, or face-to-face discussion.

24. However, it is important that the consultation process is used because this is how views are registered in the plan-making or planning application process. This ensures that while councillors hear what you have to say, you will not miss the opportunity to be heard at committees or at any subsequent appeal, inquiry, hearing or examination.
25. As permitted under the Coronavirus Act 2020, planning committee meetings are not currently being held at the City Hall due to the current guidance on social distancing. They are instead being conducted online and made available to watch on the council's Youtube channel. This will continue to be reviewed, and options such as hybrid meetings will be considered (where some attendees are in-person and some are remote). Current information is available here;  
<https://cmis.norwich.gov.uk/live/Meetingscalendar.aspx>

### **RTPI Planning Aid England**

26. The Royal Town Planning Institute (RTPI) Planning Aid England offers assistance and advice on the planning system to individuals and groups who are unable to pay for independent professional planning advice. Planning Aid encourages people to get involved in the planning system to help shape their own environment. The council supports the work of Planning Aid and will work with the service to provide independent advice for some of the involvement procedures proposed in this document.
27. RTPI Planning Aid England can be contacted via planning aid advice line:
- Tel: 0330 123 9244  
Email: [advice@planningaid.rtpi.org.uk](mailto:advice@planningaid.rtpi.org.uk)  
Web: [www.rtpi.org.uk/planning-aid](http://www.rtpi.org.uk/planning-aid)

## 2. Consultations on planning policy documents

### National policy requirements

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

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

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

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

### What kinds of documents are consulted on?

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

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

### **The current local plan**

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

### **The emerging local plan**

35. The proposed Greater Norwich Local Plan (GNLP) will be a new statutory local plan for Broadland, Norwich and South Norfolk to update the present Joint Core Strategy (JCS). This will, similarly, set out a statement of strategic planning policy for the wider Norwich area but, unlike the present JCS, will also include policies and proposals for individual sites. As such, the GNLP will eventually also replace separate site allocations plans for individual districts. It is the only formal Development Plan Document in the current Local Development Scheme programme.
36. The proposed Norfolk Strategic Framework (NSF) will be a non-statutory strategic policy statement which will set broad strategic targets and priorities for the next round of statutory local plans for individual local planning authorities in Norfolk, facilitating joint working across district boundaries and helping to fulfil the statutory Duty to Co-operate.
37. Both the above documents will cover the period to 2036. The work programme for the preparation of the GNLP and NSF is set out in the latest revision of the Norwich Local Development Scheme which was

published in March 2016. The programme is subject to review dependent on the extent of evidence likely to be required.

### **Procedural Requirements**

38. Local plan documents must be prepared in accordance with a nationally prescribed procedure set out in the national Local Planning Regulations for England, which were last reviewed in 2012. This procedure will be followed in preparing the Greater Norwich Local Plan, but a more streamlined and fast-track process will be used for the Norfolk Strategic Framework, as this is not a local plan but an evidence framework to inform other plans.
39. At key stages of plan-making there is an opportunity for the public to comment on emerging planning policies and proposals in the documents. At the end of the process, development plan documents must be submitted to the Secretary of State and be independently examined by a government appointed inspector to assess their soundness and legal compliance before they can be adopted by the city council and come into force.
40. Certain other documents must be published alongside each DPD, including:
  - the independently prepared sustainability appraisal (SA) report of the DPD at each stage (a sustainability appraisal scoping report is prepared and consulted on at the start of the process to set out what sustainability issues and objectives the SA should cover and what evidence it will use);
  - a policies map, setting out the DPD's policies and proposals on a map base (if relevant);
  - a statement of consultation summarising public representations made to the plan and how they have been addressed (called the "Regulation 22(c) statement");
  - copies of any representations made;
  - any other supporting documents considered by the council to be relevant in preparing the plan; and
  - an adoption statement and environmental statement (when the plan is adopted).
41. The local plan is supported by a range of research reports, studies and topic papers making up a detailed evidence base which informs and justifies its policies.

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

42. For many years Norwich City Council has worked in close cooperation with its neighbouring councils Broadland and South Norfolk to plan for and deliver major growth envisaged for the Norwich Policy Area. This work was first undertaken as part of a formal Greater Norwich Development Partnership (GNDP), whose responsibilities have since been inherited by

its successor the Greater Norwich Growth Board (GNGB). The Joint Core Strategy for Broadland, Norwich and South Norfolk was produced by the GNDP, which includes the Broads Authority and Norfolk County Council working in partnership with the three districts. Other documents produced by the GNDP include the Community Infrastructure Levy (CIL) Charging Schedule for each district/authority area. The Community Infrastructure Levy is a statutory charge on new development introduced by the CIL Regulations 2010. It came into force in Norwich in 2013.

43. As noted above, the need for councils and other agencies to work together in developing effective planning strategies for their areas is now a legal duty. Councils must show that they have met this statutory Duty to Cooperate in order for local plans to be accepted (found “sound” and “legally compliant”) when those plans are independently examined by government. Work on preparing the overall Norfolk Strategic Framework – although it will not be a formal local plan – will involve the city council in joint working with all the local planning authorities and other relevant bodies across Norfolk.
44. The planning policy documents which have been (and will be) prepared jointly by the Norwich area authorities are set out in the respective Local Development Schemes for each authority. Public involvement in their preparation is guided by the community involvement standards as set by the partnership councils jointly in their respective statements of community involvement. For the current round of joint local plan preparation, consultation standards and consultation periods will be common across the three local authority areas and all the participating authorities will work to the same consultation timeframes for key documents in their SCIs.

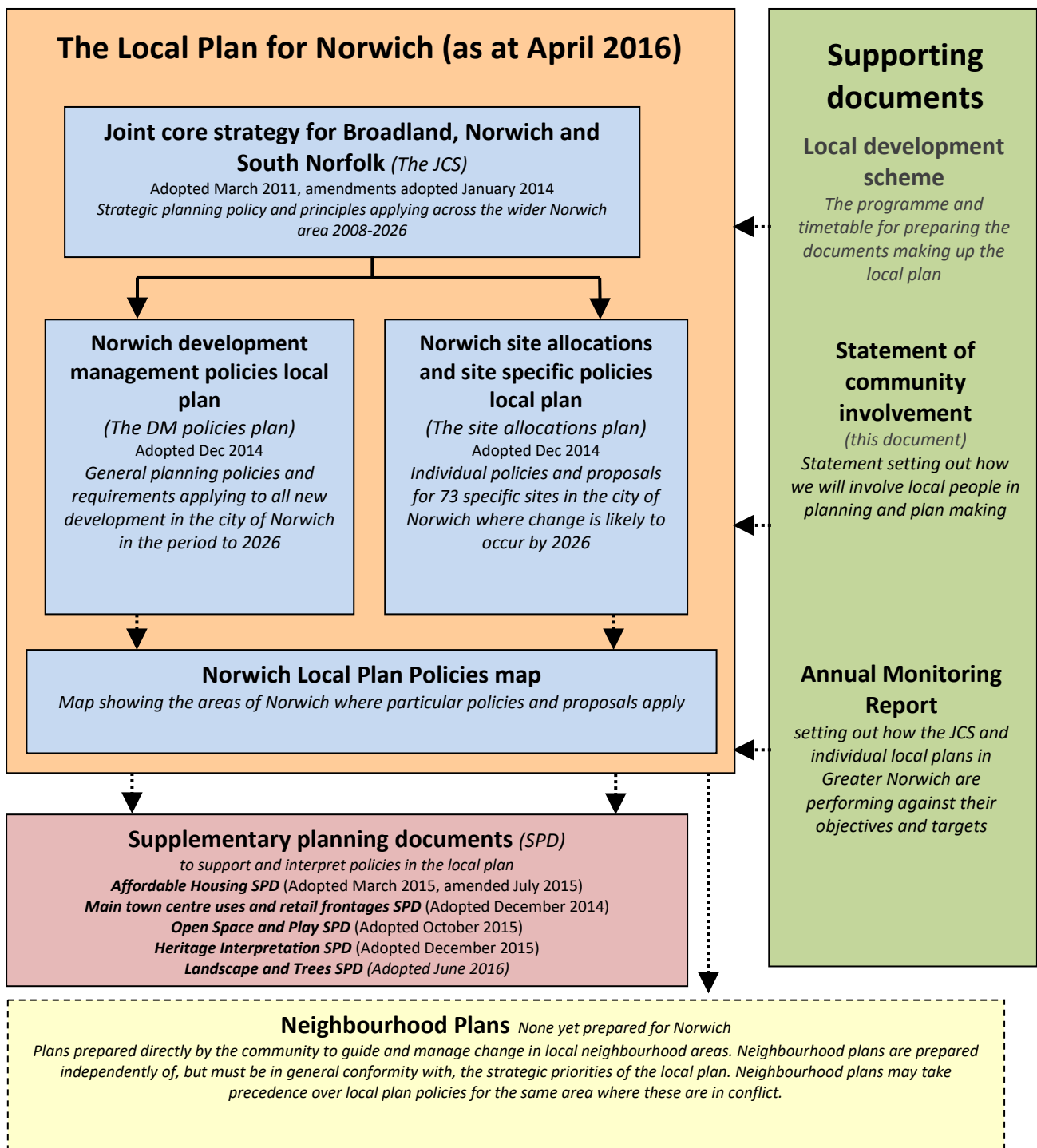


Figure 2: Documents making up the adopted local plan

## Consultation Methods

Please note that due to the Government's guidance on social distancing in relation to the coronavirus outbreak not all of the consultation methods listed below may be possible at present. We will continue to utilise electronic means of communication but may not be able to engage in face to face events or provide hard copies in a manner in which we have previously done so. We will continue to monitor Government guidance and tailor our consultation methods appropriately. We may use alternative approaches to consultation.

45. The council has a well-established procedure for involving people in plan-making. We will continue to develop our understanding of different consultation techniques over time and learn from what works, and what doesn't. A variety of methods have and will be used during consultations, taking into consideration issues being consulted on and the needs of the audience. These include the use of appropriate locations, and/or the use of particular presentation media for presentations to blind people, people with impaired hearing, and people with mental health issues or learning difficulties.
46. Consultation is carried out increasingly by electronic means but is still rapidly evolving in the digital age. Although almost all the documents we consult on are made available electronically, the challenge remains as to how information can be publicised effectively to attract the widest audience. The council is steadily expanding the use of interactive web technology to enable direct access to its services across a range of devices and allow local people to make payments, submit comments and report issues and problems direct via online forms. We will endeavour in future planning consultations to integrate these mechanisms where possible and extend the use of social media to help access "hard to reach" groups, especially younger people. We will also continue to use more traditional methods of consultation to include those without access to the internet or social media.
47. Based on our current success and lessons learned from previous consultations, we will endeavour to use a range of consultation approaches, as necessary and where permitted by the current guidance on social distancing. These are set out in the following list:
- Letters/emails to groups and individuals
  - newspapers and Citizen magazine
  - paper documents
  - council's website
  - "planning for real"<sup>1</sup> type events

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<sup>1</sup> "Planning for Real" is a nationally recognised planning process where residents take a hands-on role in registering their views, identifying priorities and suggesting solutions for development in their area

- presentations to community groups
- public meetings
- focus groups
- exhibitions
- local councillors
- social media
- local radio

48. We acknowledge that it is important to make public consultation arrangements as extensive as possible to make sure the public can get their voice heard. However, it is not always possible or appropriate to consult using all the methods listed above. We will make sure that consultations are tailored appropriately to the kind of plan, policy or proposal being consulted on and the stages it has reached. We will ensure that people with no access to the internet, email, text or social media are kept informed by traditional, non-electronic means.

#### **How long will consultations last?**

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

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

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

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

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using 3D models, plans and maps. Sessions are usually facilitated by an independent organisation such as Planning Aid England.

Document type	Normal period for consultation	Circumstances in which the consultation period will be extended
Development plan documents (DPDs)	We will consult for at least the minimum statutory period of <b>six weeks</b> (42 calendar days) on DPDs	Where a normal period of consultation would take in all or part of the Christmas/New Year holiday, the Easter holiday or the July/August summer holiday period in addition to bank holidays, extra days will be added to allow for this, up to a maximum of 14 calendar days over and above the statutory minimum.
Neighbourhood development plans ("Neighbourhood plans")	We will consult for at least the minimum statutory period of <b>six weeks</b> (42 calendar days) when proposals for neighbourhood plans prepared by designated neighbourhood planning bodies are published	
Future reviews of this Statement of Community Involvement (SCI)	We will consult for at least <b>six weeks</b> (42 calendar days) on any future reviews of this SCI	At its discretion, and only in the early, informal stages of DPD/SPD production, the Council may allow additional time for representations to be made in circumstances where there is a justifiable reason for not responding within the deadline.
Supplementary planning documents (SPD) including planning briefs	We will consult for at least the minimum statutory period of <b>four weeks</b> (28 calendar days) on SPD and on planning briefs which have the status of SPD	In accordance with the Code of Recommended Practice on Local Authority Publicity, we will not normally run consultations on planning documents in the six week period immediately before local council elections. ("Purdah").
Non-statutory planning documents and informal advice notes	We will consult for a period appropriate to the coverage and content of the document concerned	

52. For supplementary planning documents (SPDs) and planning briefs, the Local Development Regulations specify a minimum four week consultation period, although the period for legal challenge after adoption is longer than it is for DPDs. Because supplementary planning documents typically relate to small geographical areas or subjects of specialist interest, shorter consultation periods are justified, particularly as similar lead-in times and reporting arrangements exist for SPD as they do for development plan documents.
53. For neighbourhood plans a separate period of public consultation by the neighbourhood planning body proposing the plan is required before a draft plan can be formally submitted to and accepted by the council, although at the time of writing no neighbourhood plans have been prepared or proposed in Norwich.

### Who will we involve, and how?

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

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

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

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

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

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

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

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

## Publicising Neighbourhood Plans

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

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

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

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

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

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

### 3. Consultations on planning applications

Please note that due to the Government's guidance on social distancing in relation to the coronavirus outbreak not all of the consultation methods listed below may be possible at present. We will continue to utilise electronic means of communication but may not be able to engage in face to face events or provide hard copies in a manner in which we have previously done so. We will continue to monitor Government guidance and tailor our consultation methods appropriately. We may use alternative approaches to consultation.

#### Introduction

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

#### Pre-application consultation

- 60. The National Planning Policy Framework (NPPF) states that local planning authorities should encourage other parties involved in the development process to take maximum advantage of the pre-application stage, so that prospective developers and applicants who are not already required to do so by law may engage effectively with the local community before they make a planning application. This should improve the efficiency and effectiveness of the planning application system for all parties.
- 61. The city council strongly encourages developers and agents of all application types to engage with the community at the earliest opportunity. For major schemes this is a requirement. This will give the best information on which to base proposals and enable any planning application that is subsequently made to have the best chance of success.
- 62. Early involvement between developers, the community, consultees and the local planning authority allows issues and concerns to be discussed before planning proposals are formally submitted for assessment and decisions are made. Pre-application involvement by all parties allows issues and concerns to be raised at

an early stage, potentially enabling them to be addressed and giving communities the opportunity to shape or influence the development proposals.

63. There are several levels of pre-application service available, depending on the type of development proposed. A fee will be charged for this service. Further guidance can be found on the Council's website at the following link <http://www.norwich.gov.uk/Planning/PlanningApplications/Pages/PreApplicationAdviceService.aspx>.
64. The Council strongly encourages applicants to consult the local community before submitting a planning application for significant development, in particular:
- Housing developments of 10 or more dwellings;
  - Any other development with a floor area of 1,000 square metres.
65. The Validation requirements produced by the Council provide details of the pre-application consultation requirements for applications. These will be regularly updated in accordance with legislative requirements. The validation requirements can be accessed from the Council's website: [https://www.norwich.gov.uk/downloads/file/1558/validation\\_requirements](https://www.norwich.gov.uk/downloads/file/1558/validation_requirements).
66. The figure on the next page gives some basic advice on how involvement and consultation would be expected to be conducted. If community consultation is impacted by the Government's guidance on social distancing, for example preventing large public meetings, developers and agents will be expected to consider alternative methods of effective consultation and explain their approach.

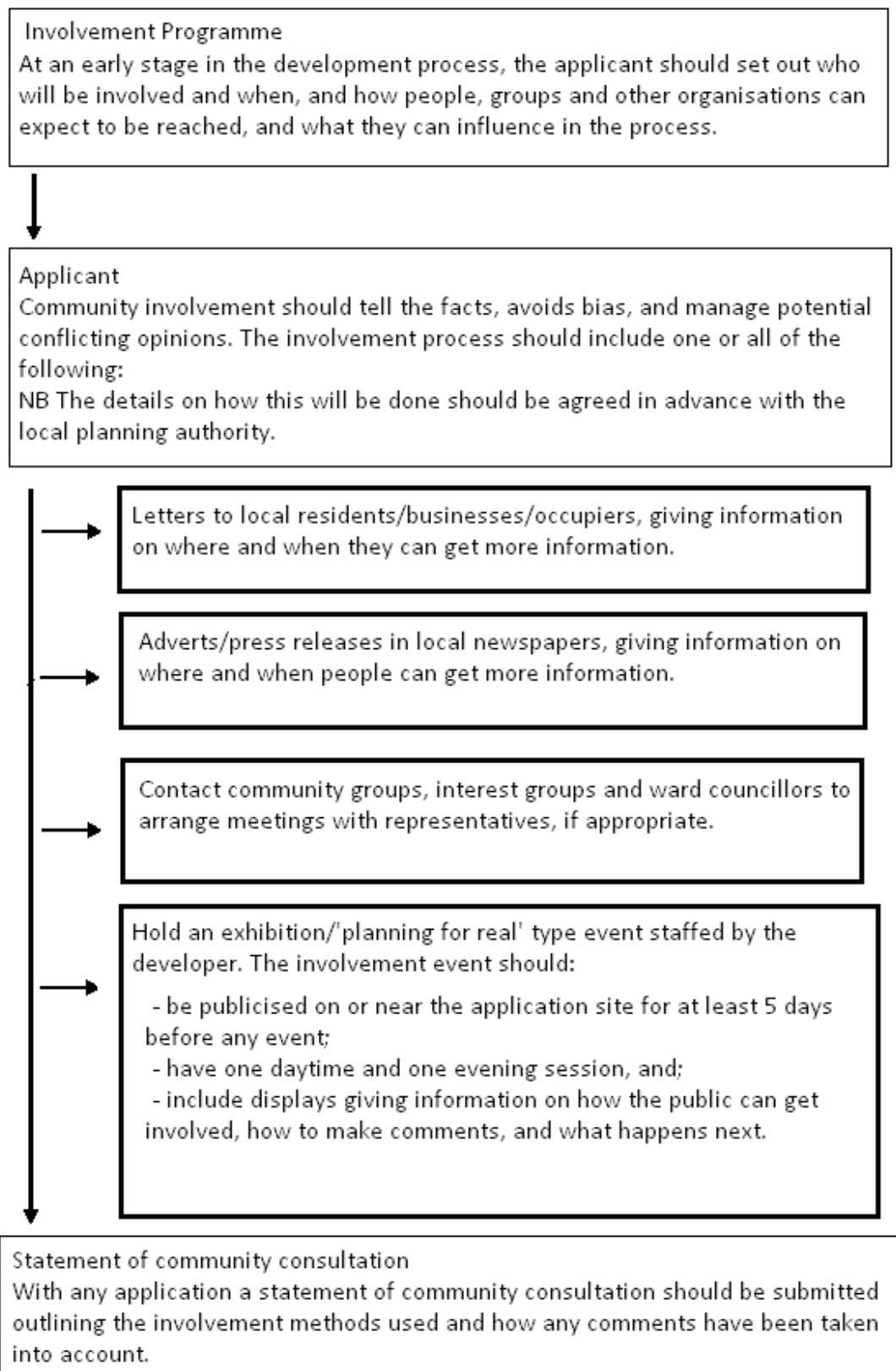


Figure 3: An example of how a pre-application community consultation could be conducted

## Planning application consultation

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

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

- i) letters and emails to statutory consultees, other organisations and interest groups;
- ii) letters and emails to residents, businesses and properties within 10 metres of the boundary of the site;
- iii) the display of site notices (for some applications);
- iv) publication in local newspapers (for some applications);
- v) viewing of all comments received on our website;
- vi) viewing of all decision reports on our website;
- vii) presentations at committee (for some applications) (in accordance with the requirements of the Planning Service Code of Conduct);
- viii) committee papers – available a week before each meeting (on the website, and in paper form where possible and subject to social distancing guidance), and;
- ix) committee minutes – available 7 days prior to the next meeting.

NB: The methods listed at ii), iii) and iv) above will be carried out in accordance with at least the minimum requirements of Section 15 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 (or any updated version thereafter). The above list is not exhaustive and may be amended in response to future changes in national planning legislation or regulation. Full details of the consultation methods on planning applications can be found at the following links:

[https://www.norwich.gov.uk/info/20017/planning\\_applications/1201/april\\_2009](https://www.norwich.gov.uk/info/20017/planning_applications/1201/april_2009)  
[https://www.norwich.gov.uk/info/20017/planning\\_applications/1202/june\\_2013](https://www.norwich.gov.uk/info/20017/planning_applications/1202/june_2013)

NB2: As permitted under the Coronavirus Act 2020, at present planning committee meetings are not being held at the City Hall due to the current guidance on social distancing. They are instead being conducted online and

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

made available to watch on the council's Youtube channel. This will continue to be reviewed, and options such as hybrid meetings will be considered (where some attendees are in-person and some are remote). Current information is available here; <https://cmis.norwich.gov.uk/live/Meetingscalendar.aspx>

69. If any planning application is amended during the process of its assessment and the amendment would be likely to have a significant adverse impact on neighbouring properties, then the occupiers of properties affected will be re-notified. All revised or additional documentation or plans will be published on the website. If necessary, the case officer for the application will agree a new determination deadline with the developer/agent as required.
70. The Planning Portal ([www.planningportal.gov.uk](http://www.planningportal.gov.uk)) provides information on planning in general, with Norwich City Council's website providing more specific information relevant to Norwich. Public Access contains details of all planning applications and comments of consultees and the consideration of the application by officers from December 2005 onwards, with some information on applications from January 1988 to November 2005.

### Material planning considerations

71. In the process of assessing an application the planning officer must have regard to material planning considerations. Some examples of material considerations and non-material considerations can be found below (please note, this list is not exhaustive). For example, the loss of property value is not a material planning consideration and will not be taken into account in the assessment of an application.
72. More advice on material planning considerations can be found via the Planning Portal and Planning Aid England by following the links below:

<http://www.planningportal.gov.uk/general/faq/faqapplyprocess%20-%20Whatarematerialconsiderations#Whatarematerialconsiderations>  
<http://www.rtpi.org.uk/media/686895/Material-Planning-Considerations.pdf>

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

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

## **4. Resources and management**

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

## Appendix 1: Local plan consultees

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

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

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

### Specific consultation bodies

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

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

## **General consultation bodies - examples**

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

The list below provides some examples of general consultation bodies:

- Community groups (area based and topic based)
- Parish councils in Norwich policy area
- Housing organisations
- Housebuilders
- Residents and tenants groups
- Business and commerce organisations
- Economic development agencies
- Educational bodies
- School councils
- Community safety bodies
- Environmental and heritage organisations
- Equal opportunities bodies
- Ethnic minority groups
- Disabled people's organisations
- Older people's groups
- Faith groups
- Health and social care groups
- Norfolk and Waveney Mental Health Trust
- Youth organisations
- Agents/developers
- Landowners
- Regeneration bodies
- Tourism bodies
- Transport bodies
- NCC Public Health
- Community centres
- Volunteer development organisations
- Sports and recreation organisations
- Health and Safety Executive

- Royal Mail
- Emergency services.
- Gypsies, Travellers and Travelling Show people
- Design Review Panel
- Norfolk Historic Environment Service
- Local Enterprise Partnerships
- Interested individuals

**Duty to Co-operate: consultees required under the 2012 Planning Regulations**  
(as amended by the National Treatment Agency (Abolition) and the Health and Social Care Act 2012 (Consequential, Transitional and Saving Provisions) Order 2013)

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

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



**Report to** Cabinet  
14 October 2020  
**Report of** Director of place  
**Subject** Council response to Planning White Paper consultation

**Item**

**6**

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### **Purpose**

To consider the current government consultation on the Planning White Paper and the proposed consultation response, and the now closed consultation 'Changes to the current planning system'.

### **Recommendation**

To approve the proposed response on the Planning White Paper to be submitted to government by 29 October 2020.

### **Corporate and service priorities**

The report helps to meet the corporate priorities Great neighbourhoods, housing and environment, inclusive economy, and people living well.

### **Financial implications**

None directly as a result of this report. Although there is limited detail at this stage the proposals, if introduced, will impact upon planning fees and on infrastructure levy receipts, with implications for the capital strategy.

**Ward/s:** All Wards

**Cabinet member:** Councillor Stonard - Sustainable and inclusive growth

### **Contact officers**

Graham Nelson

01603 989205

Judith Davison

01603 989314

### **Background documents**

None

## Report

1. The government published the [Planning White Paper](#) ('Planning for the Future') consultation on 6 August, which runs for 12 weeks until 29 October. This consultation proposes major changes to the planning system, with far-reaching implications for plan making, development management and infrastructure delivery, if implemented.
2. A further government consultation was published on the same date as the White Paper – the [Changes to the current planning](#) system consultation. This consultation period ended on 1 October.
3. At its meeting on 1 October, the sustainable development panel discussed proposed consultation responses to both consultations and made comments on each. The panel's comments on the White Paper have been incorporated into this report. The panel also suggested that the consultation response be submitted under a cover letter signed by all three group leaders to make clear the scale of concern over the emerging proposals across the parties. Following that meeting the council's response to the Changes to the current planning system consultation was submitted to government by the deadline on 1 October and is attached at appendix A for information.
4. The purpose of this report is to seek cabinet approval of the proposed response to the Planning White Paper consultation to enable its submission to government by 29 October, and to note the already submitted response in relation to the Changes to the current planning system consultation.
5. The approach taken in terms of the council's response is not to complete the lengthy response form provided in the consultation documentation, as this is designed to lead respondents rather than to engender an intelligent and informed response. These forms are also time-consuming to complete and experience to date indicates that the government pays little regard to their content. Instead the proposed approach is to include the council response in the main body of this report, set out below, with the intention of giving a clear and succinct message to government.
6. At its meeting on 22 September, the council resolved "to respond to the 'Planning for the Future' consultation, with input from local councillors, cabinet, sustainable development panel and through working with other councils, to robustly challenge and oppose plans to de-regulate the planning system and to instead make the case that a progressive, democratic, planning system underpins the delivery of healthy communities and sustainable development". It also resolved that the Leader of the Council would write to the Secretary of State at the Ministry for Communities and Local Government (MHCLG) and the Prime Minister to set out these above concerns.
7. It was recommended by sustainable development panel on 1 October that the Council's response, which will be submitted by 29 October under a covering letter setting out the council's concerns, should be signed by all Norwich City Council group leaders.

## **Wider context**

8. Over recent years the government has placed increasing emphasis on housing delivery with the aim of significantly raising housing delivery nationally to 300,000 units per annum. It has consulted on a range of housing related issues over the past 4 -5 years including Starter Homes (2017), the Housing White Paper (2017), Planning for the right homes in the right places (2017), First Homes (2020) and Future Homes (2020). Policy measures introduced in this period aimed at increasing housing numbers include the Housing Delivery Test and the standard method for assessing housing need.
9. Alongside these measures the government has also been relaxing planning controls through changes to permitted development rights, in order to provide greater flexibility in terms of changes of use without the need for planning consent. Further changes to permitted development were enacted on 1 September resulting in new use classes and greater flexibility in changes of use. The overall effect of changes to permitted development rights and use classes has been to reduce local authorities' control over new development. In addition it should be noted that the community infrastructure levy is currently not payable on housing development through permitted development.

## **Planning White Paper: Planning for the Future**

10. In its 84-page 'Planning for the Future' White Paper consultation document, the government sets out a range of proposals to radically reform the current system of local plans, development and developer contributions. Its case for such radical reform includes the following criticisms:
  - the existing planning system is too complex and inflexible;
  - local plans taking too long to prepare, and assessments of key matters such as housing need, viability and environmental impacts are too complex and opaque;
  - the system does not facilitate enough homes being delivered and it is ineffective in providing the infrastructure needed to support them;
  - the process for developer contributions for affordable housing is complex, protracted and unclear;
  - the planning system, which is based on 20<sup>th</sup> century technology, does not engage effectively with communities who could be more meaningfully engaged if the system were more digitally focused
  - planning decisions are discretionary;
  - there is not enough focus on design and little incentive for high quality new homes and places; and
  - there has been a loss of trust in the system.
11. Despite the range of issues identified as requiring reform, the white paper does however acknowledge that "planning matters" and stresses the importance of a planning system in creating great places.

12. The government sets out 25 separate proposals in the white paper, encompassing a new, simplified approach to plan-making, a streamlined development management system, speeding up delivery of development, planning for infrastructure, and delivering change. The white paper is a very high level document with little detail provided for many of its proposals. The proposals are summarised below under five main headings (reflecting the structure of the Proposals section of the white paper).
13. The white paper states that its proposals would require primary legislation followed by secondary regulation. The timing for bringing forward this legislation is not clear though the expectation is that new local plans would be in place 'by the end of the Parliament'. This would mean the legislation would need to be in force by mid 2022 at the latest.

**Streamline the planning process with more democracy taking place more effectively at plan-making stage.**

14. This includes:

- Simplifying the role of local plans. Their primary role would be to identify areas for development and protection, identifying land under three categories. **Growth areas** are described as being suitable for 'substantial development', to be defined in policy but including land suitable for comprehensive development and areas for redevelopment, urban regeneration sites etc, where outline approval for specified forms or types of development would be automatically secured. **Renewal areas** are described as suitable for some development, for example gentle densification of residential areas, development in town centres, and there would be a statutory presumption in favour of development being granted for uses specified as being suitable in these areas. **Protected areas**, including conservation areas and areas of outstanding natural beauty, would be identified where development is restricted as a result of their particular environmental and or cultural characteristics.
- Local Plans will be required to set out clear rules rather than policies for development. General development management policies would be set nationally with a more focused role for Local Plans in identifying site or area-specific requirements (for example broad height limits, scale and or density limits for Growth / Renewal areas). The National Planning Policy Framework (NPPF) would become the primary source of policies for development management. The proposal is to turn plans from long lists of general policies to specific development standards.
- Introduction of design codes which would be prepared locally with community involvement, ideally on a twin track with local plans, either for inclusion in the plans or as supplementary planning documents. The aim is to provide certainty and reflect local character and preferences about the form of development. These will follow a national design code setting out rules for development across the country.
- Public and stakeholder engagement would take place mainly at plan-making stage, and consultation at planning application stage would be streamlined.

- Introduction of a streamlined development management process to make the system faster and more certain:
  - In Growth areas, automatic grant of outline consent agrees principle of development, with further details / full permission to be agreed through streamlined and faster consent routes (reformed reserved matters process; local development order which could be prepared alongside local plan; or Development Consent Order for very large sites under the nationally significant infrastructure regime (NSIP); or possibly using planning powers of Development Corporations)
  - In Renewal areas, there would be a general presumption in favour of development established in legislation, with a new permission code for pre-specified forms of development; a faster planning application process for other forms of development in context of local plan description and the National Planning Policy Framework (NPPF); and a local or neighbourhood development order.
  - In both the above, a different proposal could come forward (by exception) but would require a planning application
  - In Protected areas, any development proposals would be subject to planning applications as now and judged against NPPF.
  - The current time limits for determination of planning applications of 8 or 13 weeks should be a firm deadline, not an aspiration. Penalties for councils that fail to determine an application within the statutory time limits could involve automatic refund of the planning fee for the application.
  - Where applications are refused there will be automatic rebate of the fee if an appeal is successful.
- Local plans would be subject to a single statutory 'sustainable development' test, replacing the test of soundness, and would incorporate a slimmed down assessment of deliverability.
- The Sustainability Appraisal system would be abolished and replaced by a simplified process for assessing the environmental impact of local plans.
- The legal 'duty to cooperate', which requires local planning authorities to continually engage with neighbours on strategic issues such as housing numbers, is proposed to be abolished. However the white paper states that further consideration will be given to the way in which strategic cross boundary issues, such as major infrastructure or strategic sites, can be adequately planned for.
- Local Plans should be visual and map-based, standardised, based on the latest digital technology and supported by a new standard template.
- Plans should be shorter in length and limited to no more than setting out site-specific parameters and opportunities.
- Councils and the Planning Inspectorate would be required through legislation to meet a statutory timetable for local plan preparation of 30 months maximum, with sanctions for those who fail to achieve this.

- Under proposed transitional arrangements, there is a statutory duty to adopt a local plan by a specified date, either 30 months from legislation being brought into force, or 42 months for authorities who have adopted a LP within previous 3 years or where a local plan has been submitted to the Secretary of State for examination.
- Seek to strengthen enforcement powers and sanctions, moving towards a rules-based system
- Develop a comprehensive resources and skills strategy for the planning sector to support implementation of reforms. The document notes that proposals for 'improving the resourcing of planning departments' will be published later this year.
- It proposals that councils should be subject to a new performance framework to ensure continuous improvement across all planning functions, and to enable early intervention if problems emerge with individual authorities.

**Take a radical, digital-first approach to modernise the planning process, driven by data.**

15. This includes:

- Supporting local planning authorities to use digital tools to support a new civic engagement process for plan-making and decision-making. The planning process would be increasingly digitised moving from 'a process based on documents to a process driven by data';
- Standardising and making publicly accessible the critical datasets that planning relies upon including planning decisions and developer contributions; and
- Modernising software for making and managing planning applications.

**Bring a new focus to design and sustainability**

16. This includes:

- Ensuring planning systems combat climate change and maximises environmental benefits. The NPPF will focus on areas where planning system can do this;
- Facilitating 'ambitious' improvements in energy efficiency standards by 2050 including net zero carbon-ready new homes by 2025;
- Under a proposed new 'fast-track for beauty', proposals for high quality developments that reflect local character and preferences and comply with local design codes and the revised NPPF, would benefit from 'automatic permission'. New development would be expected to create a 'net gain' to areas' appearance;

- For Growth areas, the government will legislate to require that a masterplan and site-specific code are agreed as condition of permission in principle which is granted through the plan;
- Introduction of a simpler framework for assessing environmental impacts / assessment opportunities;
- Design guidance and codes, produced with local input, would set rules for design of new development, and a new body established to support delivery of design codes;
- Each local planning authority would be required to have a chief officer for design and place-making;
- Protect historic buildings and areas whilst ensuring consent framework is fit for 21<sup>st</sup> century; and
- The government will legislate to widen and change nature of permitted development to enable popular and replicable forms of development to be approved easily / quickly in accordance with design principles. A pilot project will be developed to test this concept.

### **Improve infrastructure delivery**

17. This includes:

- A new single 'infrastructure levy' (IL) would replace the existing developer contributions system of Section 106 agreements and the community infrastructure levy. This would be a nationally set, flat rate charge, and based on the final value of a development above a minimum viability threshold to avoid making development unviable. The intention is that this will raise more revenue than under the current system and deliver at least as much affordable housing. The white paper states that the new levy could be used to capture a greater proportion of the land value uplift that occurs through grant of planning permission and use this to enhance infrastructure delivery, but that this 'would need to be balanced against risks to development viability';
- Increased flexibility for local authorities on how the Levy is spent: local planning authorities will have more powers to determine how developer contributions are used and expand scope of IL to include affordable housing provision;
- Local authorities can borrow against the new levy; and
- The scope of the new levy could be extended to capture changes of uses through permitted development rights, allowing these developments to better contribute to infrastructure delivery.

### **Ensure more land is available for homes and development that people need and to support renewal of towns and urban centres.**

18. This includes:

- The standard housing need method would be changed so that the housing requirement is binding on local planning authorities who would have to deliver it through their local plans. The new method is a means of distributing the national housebuilding target of 300,000 new homes annually. This nationally identified requirement would be focused on areas where affordability pressure is highest and having regard to a range of other local factors including the size and capacity of existing settlements, opportunities for better use of brownfield land, and inclusion of an appropriate buffer to take account of lapse rate and to offer sufficient choice to market. As noted earlier in this report, a recent consultation took place on the new standard methodology (response set out at Appendix 1);
- The government is considering getting rid of the five-year housing land supply requirement. It states that 'its proposed approach should ensure that enough land is planned for, and with sufficient certainty about its availability for development, to avoid a continuing requirement to be able to demonstrate a five year supply of housing land'. However it proposes to maintain the Housing Delivery Test and presumption in favour of sustainable development;
- Speeding up construction where development has been permitted, by allowing for big building sites to be split between developers to accelerate delivery. The NPPF would be revised to ensure that masterplans and design codes should seek a variety of development types from different builders to allow for more phases to come forward together; and
- Providing better information to local communities and promote competition amongst developers.

### **Council's response to Planning White Paper**

19. Some criticisms of the current planning system as set out in the white paper are well founded, including the length of time it takes to produce a local plan for example, and the need for better use of technology in planning processes. However the majority of the proposals raise serious concerns for the council.

20. The council's response to the white paper consultation is set out below.

### **Plan-making**

21. The council has major concerns at the proposed zoning of growth, renewal and protection areas, particularly given that there is little information provided about how this would work in practice. This lack of information makes it difficult to respond to the proposals, however a key concern is that they appear to over-simplify how zoning might operate, for example in defining the zones. For example, Norwich city centre is a major focus of growth in the adopted and emerging local planning framework but is also a conservation area, so it is not clear how it would be defined in the new-style local plans. It is not clear whether zones could be defined at a very detailed level within urban areas to reflect the variety within them, for example allocated sites and conservation areas. It is critically important that the

proposals do not undermine Norwich's established role as a regional centre for retail, leisure, employment and housing development.

22. Detailed guidance from MHCLG is required to assist local planning authorities in this new process. It is essential that the creation of a rigid planning zone approach must not be at the expense of rich pattern, character and diversity of place, and existing levels of environmental protection and enhancement.
23. The introduction of zoning is potentially very disruptive to the plan making process, particularly for those authorities with plans that are reasonably well advanced, such as the Greater Norwich Local Plan. The process of altering the course of a local plan may be just as disruptive as starting the process again.
24. The statutory 30 month time limit for preparation of local plans appears highly unrealistic based on the city council's experience of plan-making, and hard to reconcile with the proposal to have more public involvement at plan-making stage and less at development management stage (also see 'Local democracy and consultation' section below). Whilst a reduction in local plan timescales is desirable the proposed timescales for each stage seem overly optimistic and little evidence is provided to illustrate how this approach will speed up planning. For example the 'Call for areas' element of the plan making process is likely to be contentious and time-consuming and likely to exceed 6 months. Also, for Growth areas, whilst the provision of masterplans and design codes should help reduce uncertainty for those wishing to bring sites forward, it must be acknowledged that it will take significant time to develop new allocations, masterplans and design codes. It is not clear how the required level of detail needed to deal with complex sites will be achievable under the new streamlined local plan process, given the time limits and emphasis on up-front community engagement.
25. The proposed streamlining of the local plan and development management process, with nationally set general development management policies, will reduce the flexibility of councils to set policy to respond to local issues and to reflect local market conditions, and will only increase the pressure for national regulation. It is very important that local planning authorities can respond effectively to local issues by bringing forward appropriate policies in their local plans. For example, local planning authorities may wish to develop policy to address local issues such as the growing impact of short-term lets and holiday homes, or to (in the context of increasing deregulation of planning controls) include policies in their local plans to control changes of use under permitted development rights relating to C/U from office to residential use where appropriate.
26. There is concern at how a rules-based local plan approach would deal with specific site issues particularly in allocating sites in city centres, such as Norwich, with a complex range of site specific constraints. Some issues may not be identified at site allocation stage unless potentially detailed concept designs are first progressed. The proposals also appear to naively assume that if a clear rules based policy is adopted that all developers will stick to those rules and that the decision making process will be no more

than a tick box exercise. This might be more realistic for large urban extension projects but less realistic for urban areas with complex sites, constraints, and viability considerations. Indeed in an urban area there can be vast differences in what is appropriate from one site to the next. Whilst adopting masterplans as part of a permission in principle on a site allocation may go some way to dealing with this, it would not address the numerous windfall developments which come forward in urban areas and which are not always foreseen at the planning making stage.

## **Strategic planning**

27. In response to previous government consultations on the planning system, the council has stressed the need for effective long-term strategic planning across appropriate geographical areas, to ensure that that economic, infrastructure and environmental priorities of local authorities and other stakeholders are aligned. The white paper proposes to abolish the duty to cooperate but provides 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”.
28. Without a strategic planning framework it is difficult to see how strategic cross boundary issues are going to be effectively addressed and how sustainable patterns of development will be arrived at. This is a particular issue for Norwich and other cities where the wider urban area is split between several local authorities. Decisions made in one local authority area may greatly impact on another, for example car-based out-of town office development can impact negatively on the vitality of city centres, whilst the focus on permitting greenfield development in one authority may undermine efforts in another to bring forward hard to deliver brownfield development in more sustainable locations. This concern is particularly pertinent when considering the implications of the revised method for assessing housing need – see appendix A – which underscores the need for ongoing effective cross-boundary working. The Norfolk local authorities have established cross-boundary working arrangements which have resulted in the production of a Norfolk Strategic Planning Framework to support local plan production. This addresses cross-boundary strategic issues such as housing distribution and infrastructure delivery, as well as production of joint evidence studies such as the most recent Strategic Housing Market Assessment and the Green Infrastructure and Recreational and Mitigation strategy currently in preparation. It is also difficult to see, in the absence of strategic planning and cooperation, how local areas can align their Infrastructure Funding Statements and Infrastructure Levy contributions with strategic infrastructure investment.

## **Local democracy and consultation**

29. The focus on participation at the plan-making rather than at the application stage is a major cause for concern and will severely curtail opportunities to engage in the system. Local communities may not feel able to respond effectively at plan-making stage when proposals may be less tangible than at decision-making stage. It is generally only when a proposal is being

actively discussed at planning application stage that people are motivated to engage in the process.

30. The proposed approach also raises serious concerns about the role of local authority planning committees in providing democratic oversight, and how accountable the new system would be. If the proposals are implemented, the current approach where local councillors decide planning applications with opportunities for the public to make representations would effectively be at an end. For example there is no detail provided under the proposals clarifying how neighbours and other interested parties can comment on proposals where the principle of development has been accepted (as in the case of an allocation in a Growth area). It is important that this process is clarified to ensure that the process is fully inclusive and democratic, rather than taking a top-down approach.
31. Under the proposed streamlining of the local plan system there would be 'meaningful public engagement' at two points in the process – at the initial Regulation 18 stage when the plan is in its early stages, and the later Regulation 19 stage just before it is sent to the Planning Inspectorate for examination. It is debateable whether this is sufficient opportunity for the public and stakeholders to be meaningfully involved in the plan making process, especially given the reduced opportunities at planning application stage. The Greater Norwich Local Plan has had a 'call for sites' consultation and three subsequent Regulation 18 consultations to date, which have ensured stakeholder input into the process and helped to shape the emerging plan.
32. Although public examinations are proposed to continue, a potential option is proposed to remove this process, instead requiring local planning authorities to undertake a process of self-assessment against a set of criteria and guidance, which would result in the removal of the right to be heard. This raises the concern that communities would have less of a say than under the present examination process. It also raises the possibility that a local authority (in the absence of the duty to cooperate) could adopt a plan that would have significant implications for its neighbours, for example where a rural district adjacent to a city allocates land for major out of centre development sites which would impact on the vitality of city centres.

### **Place-making and sustainability**

33. There is little reference to ensuring that local plans are 'climate ready'. For example whilst the zoning proposals make no mention of how low and zero carbon infrastructure will be dealt with in the different zones (the assumption being that this will be addressed by design codes).
34. There is a need for greater clarity and certainty of how the impacts of new development will be assessed under the new proposals. Under the current system of environmental assessment, which includes Strategic Environmental Assessment / Sustainability Appraisal (SEA/SA) of local plans, and Environmental Impact Assessment (EIA) of development proposals, there is potential for duplication, delay and lack of transparency.

However in proposing the abolition of sustainability appraisal of local plans the white paper provides no detail as to how the simplified assessment process would work and the implications for SEA and EIA. For example for Growth areas, allocations confer outline consent upon adoption of a local plan. However by avoiding the outline application stage, it is not clear how environmental impacts will be screened, scoped and assessed in Growth areas (especially if SA is abolished) and whether EIA will be required at the detailed application stage. The white paper does however state that the new system will need to ensure that “we take advantage of opportunities for environmental improvements while also meeting our domestic and international obligations for environmental protection”. It notes that this will be the subject of a separate and more detailed consultation in the autumn, which will be awaited with interest.

35. The proposal in the white paper for new homes to be carbon neutral by 2050 lacks ambition, given that this has been pushed back from 2016 as originally intended by the government. Whilst the ambition that homes built under the new system will not need retrofitting is welcome, there is no mention of how housing delivery will be complemented by a national retrofit strategy to reduce energy demand and support place-based regeneration.

### **Digital transformation of planning**

36. The white paper’s proposals for a more digital planning system has many potential benefits. For example the ability to access real-time data on many fronts including for example pedestrian footfall or air quality will help transform how these issues are taken account of in development proposals. Also the ability to ensure more effective input from a wide range of participants and stakeholders through improved consultation methods, will be beneficial to planning.
37. Whilst the white paper’s proposals in this respect are largely welcomed, it is important that they complement and do not replace existing approaches to planning. It is important that engagement still includes those who lack the confidence, skills or resources to use digital technology.

### **Design**

38. The white paper has a strong focus on design quality and “beauty”, a highly subjective concept, with a requirement for local authorities to produce design codes as noted above. These design codes need to be responsive to the local environment as what works in one setting may not be appropriate in another. They need to be context-specific and more detail is required on how they can be sensitively applied to different areas and contexts. There is the danger that a design code may reduce the scope for innovation in development (such as the ability to bring forward schemes such as the award-winning Goldsmith Street development in Norwich for example) or reduce the ability to respond to new technologies, so there is a need for sufficient flexibility within design codes to enable this and to respond effectively to local circumstances. Once a design code is established as the basis for development, opposition against proposals

designed in compliance with the relevant design code is likely to be stifled. Stakeholder and local community input into the design code development process is therefore critical, though it should be noted that this will inevitably have impacts on timescales.

39. Significant resourcing will be needed to ensure that design codes address critical issues including decarbonisation, climate resilience, health and equality, and to ensure meaningful local community and stakeholder involvement. It is very difficult to reconcile the focus in the white paper on the quality of design with the ongoing deregulation of the planning system which has resulted in much poorly designed housing being delivered.

## **Housing delivery**

40. Issues relating to housing delivery have also been addressed in the council's response to the 'Changes to the current planning system' consultation at Appendix A, in relation to the proposed revision to the standard methodology for assessing housing need, the proposals for First Homes, and the raising of threshold for affordable housing delivery on sites.
41. The imposition of binding housing requirement figures, based on a revised standard method, will not guarantee delivery of significantly raised levels of housing. It is not the planning system that is preventing delivery of new housing; the white paper does nothing to address other more importance blockages on delivery such as developers land-banking sites.
42. There are no proposals to support construction innovation and little recognition of factors that lead to rising house prices such as speculation in land and property markets and loss of grant funding for social housing.
43. The delivery of affordable housing will be affected by the requirement to grant discounts for First Homes and the proposed flexibility to spend Infrastructure Levy receipts on "improving services and reducing council tax".
44. As with previous reforms there is a narrow emphasis on increasing the supply of land for market housing which risks crowding out other important planning objectives. The lack of any enhanced powers in order to deliver planned development is a serious weakness in the white paper's proposals.

## **Infrastructure delivery**

45. Through the creation of the new Infrastructure Levy (IL) by merging the existing community infrastructure levy (CIL) and section 106 planning obligations systems, the white paper aims to "raise more revenue than under the current system of developer contributions, and deliver at least as much - if not more - on-site affordable housing". It is agreed that the existing system of CIL and S106 is extremely complex and time consuming and can significantly delay decisions being issued on fundamentally acceptable developments. However the council has a number of concerns in relation to the proposals as outlined below.

46. The later timing of payments under the new system, at completion of development rather than commencement, presents a major issue in terms of delivery of infrastructure. Information is required on how this would impact on land values and viability of development. Again there is little detail of how this would operate in practice. It is important that payment of the IL on completion does not enable developers to avoid paying the levy by failing to complete the development.
47. The proposals include a threshold below which IL would not be sought on developments of marginal viability. There are no proposals for redistribution of IL meaning that in high value areas there would be far greater IL receipts whereas in lower value areas with marginal viability there is likely to be a shortage of IL receipts and in turn affordable housing.
48. Although the white paper proposes that local authorities will be able to borrow against the new Infrastructure Levy it provides no details of how this might operate and of how investment will be coordinated strategically, for example for highway infrastructure.

## **Resources**

49. Whilst the white paper acknowledges that reforms will require resourcing, and states that a comprehensive resources and skills strategy will be produced by government for the planning sector, there is little detail about the specific skills gaps that will be addressed. This is particularly required in areas such as digital planning, net zero carbon and climate resilience, design, and masterplanning. There is an urgent need for local planning authorities to be properly resourced to implement the proposed major changes to the planning system.
50. The white paper suggests that fees will continue to be set nationally, however it is noted that the week prior to the issue of the white paper that the Housing, Communities and Local Government Committee recommended that the ability to set planning fees should be devolved to local authorities. The ability for planning authorities to be funded from planning fee income varies significantly from one authority to another, often due to circumstances outside an individual planning authorities control. Typically authorities with large urban extensions can drive significant planning fees from larger developments with less resource required to determine such applications. Conversely we have found in Norwich that brownfield urban sites require far greater resource commitment and are often smaller driving lower planning fees. In addition more minor applications (such as householders) fall some way short of covering the costs of determination. The ability to set fees locally is therefore advocated.

## **Overall conclusions**

51. These radical proposals are coming forward at a time of unprecedented economic, societal and market instability. The council is strongly critical of the proposals overall which undermine rather than improve the planning system, with serious implications for the delivery of sustainable development.

52. The council therefore does not support the majority of the proposals in the white paper as noted above. In summary, the proposals would undermine the ability of local authorities to produce plans that respond effectively to local need, through the zoning approach and streamlining of local plans. They would also threaten delivery of affordable housing, curtail local democracy, and impact on effective stakeholder engagement in the planning process. The council is also concerned at the proposals' implications for effective cross-boundary working on strategic planning issues in the absence of the duty to cooperate. Furthermore, there is no guarantee that the proposals will deliver the required new homes and may indeed give rise to greater uncertainty in relation to housing need. There are some minor aspects of the consultation which may have some merit as noted above but overall these are greatly outweighed by the negative consequences of the proposals.

## Integrated impact assessment



**NORWICH**  
City Council

### Report author to complete

<b>Committee:</b>	Cabinet
<b>Committee date:</b>	14 October 2020
<b>Director / Head of service</b>	Graham Nelson
<b>Report subject:</b>	Response to current planning consultations
<b>Date assessed:</b>	24 September 2020

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial inclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
<b>Equality and diversity (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Relations between groups (cohesion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Eliminating discrimination & harassment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advancing equality of opportunity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Environmental (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Natural and built environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Energy and climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>(Please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Risk management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Recommendations from impact assessment	
Positive	
Negative	
Neutral	
There are no direct effects that would arise from this report. This is a response to a consultation document therefore there is a great deal of uncertainty about the nature of changes that will eventually be made to the planning system. For this reason, despite the fact that the council has serious concerns about the majority of the consultation's proposals, all impacts are currently assessed as neutral.	
Issues	

## Submitted response of Norwich City Council to the 'Changes to the Current Planning System' consultation

1. The council's response to this consultation document is set out below. Its key proposals are:
  - (a) changes to the standard method for assessing local housing need (i.e. the method for setting housing targets in each district)
  - (b) securing of First Homes (a type of market discount affordable housing) through developer contributions
  - (c) lifting the 'small sites' threshold below which developers do not need to contribute to affordable housing, from 10 to 40 or 50 homes.
  - (d) extending the current Permission in Principle (PiP) to major development

### Revised methodology for assessment local housing need

2. The government proposes out a revised methodology for calculating local housing need which will be the basis for local plan housing requirements. The original standard method was introduced in 2018 with the aim of "speeding up the planning system" and planning for delivery of 300,000 new homes annually. This method has already been revised once since its introduction, and the government has acknowledged that the current method is not considered capable of delivering the 300,000 new homes target.
3. The new method firstly involves setting the baseline by blending the existing housing stock with household projections, acknowledging the shortcomings of the existing method which uses only household projections. This method is intended to lead to more stability and less variation. Step 2 is to adjust the baseline by taking account of market signals using affordability data. The Planning white paper proposes that the standard method will generate a local housing need figure which will then be adjusted further by councils taking into account various constraints in their areas, which would be a 'binding figure' on local authorities.
4. The impact of the new method of calculating housing need is that there is huge variation in local housing need across local authorities locally and nationally. See appendix 1 which shows the variation between the existing and proposed methods for the East of England. This shows that housing need Norfolk-wide would rise by 45% under the revised method. In Greater Norwich the rise is even more significant, with a rise of over 60% for the whole area (from 2,008 units per annum under the current method to 3,256 units under the revised method). Within Greater Norwich there is significant variation, with a doubling of need in South Norfolk district, an almost 80% rise in Broadland, and a fall of 16% in Norwich. This is likely to have a major impact on the Greater Norwich Local Plan on which a verbal update will be given to this panel. The difference between the current and proposed methodologies are summarised below for the Greater Norwich authorities. The degree of change evident in the figures does not assist coherent

strategy planning. It also should be noted that in relation to the urban area the methodology calculates a level need that is considerably below the Council's previous assessments of housing needs.

<b>District</b>	<b>Current methodology</b>	<b>Proposed new methodology</b>
South Norfolk	893	1,832
Norwich	598	502
Broadland	517	922
<b>Greater Norwich total</b>	<b>2,008</b>	<b>3,256</b>

5. The revised method does not take local circumstances or local authorities' ambitions for growth into consideration. This results in some anomalies where some areas with significant growth ambitions would see a decrease in housing need (eg Norwich) whereas others without such growth ambitions would see increases in need. These anomalies may be due to the use of household projection figures in the methodology that fluctuate very markedly based on recent build rates.
6. For those areas with increased housing requirements, local authorities will also have to address the implications for additional infrastructural requirements, including transport and community infrastructure, and potential impacts on the environment. It is also important to note that there is little evidence to suggest that the development industry has the ability or desire to deliver the increased levels of housing.
7. There has been much discussion about the revised housing targets in the national and planning press in recent weeks and a government minister has recently indicated that proposed new housing numbers will not be "set in stone". It is also possible that there may be a further revision to the standard method in response to the consultation which adds to the uncertainty facing planning authorities and is unlikely to help ensure increased housing delivery.

### **Developer contributions for First Homes**

8. Earlier this year the government consulted on initial proposal for its First Homes policy seeking to introduce a new form of discounted market housing for first-time buyers through the planning system. The current consultation proposes that 25% of all affordable housing secured through developer contributions will be for First Homes (ie houses or flats on new developments, sold with a discount of 30% to local first-time buyers) and that First Homes will take priority over other affordable tenures.

9. The 25% requirement is lower than that proposed in the earlier consultation, however it still does not take account of local circumstances such as local affordability, or the overall amount / types of affordable housing needed in a local area. Therefore the new proposals continue to raise serious concerns that local authorities will effectively lose control over the type of affordable housing delivered in their areas and reduce their ability to meet their local needs and may effectively displace other affordable tenures such as affordable rent.
10. The current Strategic Housing Market Assessment for Central Norfolk (2017) identifies a need for 38% of new homes in Norwich over the period 2015-35 to be affordable; the greatest affordable housing need in Norwich is for affordable rented homes (84%) compared to intermediate housing tenures at 16%. This starkly illustrates why policy prescription is incompatible with meeting identified local housing need.
11. The council has ambitious plans for housing delivery in the city as agreed by cabinet in July. The council already works with a range of providers to bring forward much needed affordable housing in the city. It is therefore critical that the council's efforts in this respect are not curtailed by the proposed changes. Progress to date includes working with Registered Providers to redevelop redundant or under-used council owned land. For example, our partnership with Orwell Housing Association in recent years has delivered over 150 new affordable homes in the city. Since 2012 the council has also launched its own house building programme and last year won the prestigious Stirling prize for Goldsmith Street, its first major development in over 20 years.

### **Increasing the threshold for delivery of affordable housing on sites**

12. The consultation proposal to raise the threshold for delivery of affordable housing from sites of 10 or more units (in the current NPPF) to sites of either 40 or 50+ units is a major concern for the council. This measure aims to stimulate economy recovery with a particular focus on reducing 'burdens' (ie developer contributions) on small and medium sized enterprises (SMEs), in response to the Covid-19 pandemic. The policy would be introduced for an initial period of 18 months before being reviewed by ministers to ensure that it supports the country's economic recovery after the pandemic but does not inflate land prices in the longer term.
13. This is likely to have major impacts on the delivery of First Homes and affordable homes given that they would now only be required on large sites of over 40/50 units. The consultation document acknowledges that the measure will lead to a reduction of between 7-14% of affordable housing delivery per annum if applied to sites of 40+ units, and a reduction of 10-20% for sites of 50+ units.
14. Given that the proposed threshold will be nationally applied, it does not reflect local circumstances and characteristics, and will make it much harder for Norwich and many other local authorities to deliver their affordable housing requirements, particularly for those authorities that have a high

proportion of housing developments on smaller sites. Between 2011-12 and 2019-20, 18 Section 106 schemes in Norwich delivered affordable housing, but only 12 of the sites were for schemes of 40+ units (66%) which means a third of our AH homes were delivered on sites below 40 units.

15. The benefits of the policy change in bringing forward some housing schemes may be quite minor when set against the loss of affordable housing. This proposal is strongly resisted for the above reasons and also as, based on previous experience, it is likely to lead to developers bringing forward sites just under the threshold in order to avoid affordable housing contributions.

### **Removal of restriction in regulation to allow for Permission in Principle on major development**

16. Under the current system, Permission in Principle (PiP) currently applies only to minor development schemes (sites of under 10 units of housing). PiP is equivalent to outline planning consent and establishes acceptability of development in principle, with technical details reserved for future application. There are two routes to grant of PiP, either by application for PiP by a developer, or through local authorities identifying sites for PiP on their Brownfield Register.
17. Again, this proposal aims to benefit smaller developers by reducing upfront costs and by providing greater certainty.
18. Given that the scope of the technical details stage of PiP is more limited than for a normal planning application, there is concern at the potential for harm to arise from such development. This proposal is another example of bypassing public scrutiny of proposed development. It is also likely to lead to a reduction in planning fees for councils.

## Changes to housing need in East of England by district

	Avg delivery (last 3 years)	Current Standard Method	Proposed new Standard Method	Actual Change	% Change
<b>East of England</b>	<b>30,612</b>	<b>38,971</b>	<b>45,383</b>	<b>6,412</b>	<b>16.5%</b>
<b>Hertfordshire</b>	<b>4,143</b>	<b>8,074</b>	<b>6,909</b>	<b>- 1,165</b>	<b>-14.4%</b>
Dacorum	627	1,023	922	- 101	-9.9%
Hertsmere	524	716	668	- 48	-6.7%
St Albans	450	893	997	104	11.6%
Three Rivers	186	624	588	- 36	-5.8%
Watford	309	787	533	- 254	-32.3%
North Hertfordshire	347	973	625	- 348	-35.8%
East Hertfordshire	666	1,145	1,122	- 23	-2.0%
Broxbourne	337	594	465	- 129	-21.7%
Stevenage	350	444	322	- 122	-27.5%
Welwyn Hatfield	347	875	667	- 208	-23.8%
<b>Bedfordshire</b>	<b>4,080</b>	<b>4,286</b>	<b>4,618</b>	<b>332</b>	<b>7.7%</b>
Bedford	1,321	1,305	1,153	- 152	-11.6%
Central Bedfordshire	1,993	2,386	2,752	366	15.3%
Luton	766	595	713	118	19.8%
<b>Norfolk</b>	<b>4,215</b>	<b>4,116</b>	<b>5,969</b>	<b>1,853</b>	<b>45.0%</b>
Kings Lynn and West Norfolk	404	538	540	2	0.4%
Breckland	692	661	1,070	409	61.9%
Broadland	673	517	922	405	78.3%
North Norfolk	505	552	730	178	32.2%
Norwich	529	598	502	- 96	-16.1%
South Norfolk	1,164	893	1,832	939	105.2%
Great Yarmouth	248	357	373	16	4.5%
<b>Suffolk</b>	<b>5,214</b>	<b>5,759</b>	<b>7,701</b>	<b>1,942</b>	<b>33.7%</b>
Ipswich	2,769	3,142	3,755	613	19.5%
Babergh	379	416	789	373	89.7%
Mid Suffolk	474	535	754	219	40.9%
West Suffolk	737	800	743	- 57	-7.1%
East Suffolk	855	866	1,660	794	91.7%
<b>Cambridgeshire</b>	<b>5,658</b>	<b>6,053</b>	<b>6,944</b>	<b>891</b>	<b>14.7%</b>
Peterborough	2,241	2,199	3,009	810	36.8%
Cambridge	1,069	658	745	87	13.2%
East Cambridgeshire	298	597	554	- 43	-7.2%
Fenland	418	538	844	306	56.9%
Huntingdonshire	823	976	1,019	43	4.4%
South Cambridgeshire	809	1,085	773	- 312	-28.8%
<b>Essex</b>	<b>7,302</b>	<b>10,683</b>	<b>13,242</b>	<b>2,559</b>	<b>24.0%</b>
Southend-on-Sea	498	1,181	1,324	143	12.1%
Thurrock	623	1,147	1,483	336	29.3%
Brentwood	191	453	393	- 60	-13.2%
Maldon	250	308	623	315	102.3%
Braintree	439	857	776	- 81	-9.5%
Chelmsford	1,089	946	1,557	611	64.6%
Colchester	1,045	1,078	1,612	534	49.5%
Tendring	713	866	1,141	275	31.8%
Basildon	364	1,001	820	- 181	-18.1%
Castle Point	160	354	386	32	9.0%
Rochford	226	360	586	226	62.8%
Epping Forest	380	953	868	- 85	-8.9%
Harlow	432	473	442	- 31	-6.6%
Uttlesford	892	706	1,231	525	74.4%

<b>Report to</b>	Cabinet	<b>Item</b>
	14 October 2020	
<b>Report of</b>	Chair of scrutiny	<b>7</b>
<b>Subject</b>	Scrutiny committee recommendations	

### **Purpose**

To consider the recommendations from the scrutiny committee meeting held virtually on 17 September 2020.

### **Recommendation**

To ask cabinet to consider the recommendations made at the meeting of scrutiny.

### **Corporate and service priorities**

The report helps to meet all the corporate priorities.

### **Financial implications**

None

**Ward/s:** All wards

**Cabinet member:** Councillor Kendrick - Resources

### **Contact officers**

Adam Clark, strategy manager

Emma Webster, scrutiny liaison officer

### **Background documents**

None

# Report

## Background

1. The council's scrutiny committee is constituted of councillors who do not sit on cabinet. They are expected to review/scrutinise and oversee decisions made by cabinet. They can 'call in', for reconsideration, decisions made by cabinet or an officer which have not yet been implemented. The main functions of scrutiny are to hold cabinet to account by examining their proposals; evaluating policies, performance and progress; ensuring consultations, where necessary, have been carried out; and highlighting areas for improvement.
2. The committee makes recommendations for cabinet, the wider council and other stakeholders based on evidence on the issues scrutinised at their meetings.
3. The two main items discussed at this meeting were the work of New Anglia Local Enterprise Partnership (LEP) and the report back from the scrutiny select committee on short term lets.
4. Mr Chris Starkie, Managing Director and Lisa Roberts, Head of Strategy for the LEP attended overview and scrutiny. This was an opportunity for members to question the LEP on issues which concerned them and table questions on behalf of their constituents. Topics were wide ranging and broadly fitted into five lines of enquiry;
  - Business themes
  - Covid recovery and social equality themes
  - The environment themes
  - Accountability theme
  - Voluntary sector engagement theme

During the discussion it was apparent that not all of the questions tabled in advance would be considered during the meeting due to time constraints. It was agreed that the LEP would submit answers in writing to those questions which remained outstanding and it was resolved that scrutiny committee would consider the information received from the LEP at the meeting and the further written responses at their next meeting on 19 November, with a view to then making recommendations to cabinet.

5. The scrutiny select committee for short term lets is made up of Clls Carlo, Giles, McCartney-Gray and Oliver. The select committee presented their report which shows that research indicated there is an increase in the number of whole properties let on a short term basis in Norwich. This in turn had led to a number of issues including impact on neighbours, impact on housing supply, compliance with health and safety and the impact on council finances. A letter from a member of the public received in response to the report noted the absence of council policy on short term lets. Scrutiny agreed to ask the Chair to write to both Norwich MPs with a copy of the report to seek their views on the subject, and agreed that the select committee would sign off a response to the points made from the member of the public.

It was **RESOLVED** to ask cabinet to consider the following recommendations made by the select committee in its report on short term lets:

- (1) nominating a lead Portfolio Holder with responsibility for short lets.
- (2) promoting a way for citizens to report on-line complaints about short lets without fear of repercussions; (ASB, sub-standard, whole properties operating short stays). Relevant officers to liaise where necessary with relevant local agencies (Police, Fire Service)
- (3) contacting Airbnb UK and request copy of their proposals for a registration system and to comment.
- (4) conducting a sample of whole property short stay lettings and the extent to which they comply with planning and health/safety standards.
- (5) examining a sample of short let properties in receipt of business rates relief to determine whether they require planning permission for change of use and if not, should they be paying Council tax?
- (6) whether a policy on short stay lets is needed as part of the review of the City of Norwich Development Management Plan Policies and any policy changes to feed into the Greater Norwich Local Plan.
- (7) Asking the chair of scrutiny to write to Clive Lewis MP and ask him to join the Short Let Sector All-Party Parliamentary Group and work with Parliamentary colleagues on the need for a registration system, enforcement of health and safety standards (to include need for locks on bedrooms and bathrooms) and report back on progress to Scrutiny Committee.
- (8) writing to the Government and outline the growing problems around short stay accommodation in Norwich and request: a compulsory registration and licensing scheme fully funded by Whitehall; a specific planning use class; and basic, enforceable health and safety obligations to install smoke detectors, carbon monoxide monitors, and locks on individual bedrooms where properties are split into multiple lettings, and/or the owner continues to live.

- (9) considering responding to the HM Treasury Business Rates Review with regard to short term lettings and business rates relief and short stay visitor costs falling on permanent residents and businesses; (deadlines of 18 September and 31 October).
- (10) Scrutiny Committee will consider whether it wishes to consider the impact of short-lets accommodation in relation to the gig economy on local hospitality businesses such as independent hotels, guest houses, restaurants, cafes and taxi firms; and
- (11) Scrutiny Committee to keep short term lettings under review.

## Integrated impact assessment



**NORWICH**  
City Council

### Report author to complete

<b>Committee:</b>	Cabinet
<b>Committee date:</b>	14 October 2020
<b>Director / Head of service</b>	Director of resources
<b>Report subject:</b>	Scrutiny Committee Recommendations
<b>Date assessed:</b>	28 September 2020
<b>Description:</b>	A summary of scrutiny committee discussions and recommendations from 17 September 2020

	Impact			
<b>Economic</b> (please add an 'x' as appropriate)	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Finance (value for money)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial inclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Social</b> (please add an 'x' as appropriate)	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
<b>Equality and diversity (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Relations between groups (cohesion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Eliminating discrimination & harassment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advancing equality of opportunity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Environmental (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Natural and built environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Energy and climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>(Please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Risk management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Recommendations from impact assessment	
Positive	
Negative	
Neutral	
Issues	





**Report to** Cabinet  
09 September 2020  
**Report of** Head of neighbourhood housing services  
**Subject** Home improvement team and disabled adaptations service

**Item**

**8**

## **KEY DECISION**

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### **Purpose**

To consider the home improvements work provided by Norwich City Council and to seek approval to enhance the service for council tenants as part of a tenure neutral approach.

### **Recommendations**

To approve:

- 1) That the current assistance for council tenants is enhanced with a suite of grants mirroring those offered for private sector residents, specifically:
  - Disabled Facilities Grants
  - DFG Top Up Grant
  - Hospital Discharge Grants
  - Preventing Hospital Admission Grants
- 2) That the operating model of the home improvement team is replicated for council tenants so that they are offered the same high level of service that residents in the private sector receive.
- 3) Immediately Create one FTE Caseworker post and one FTE Senior Caseworker post initially on a 2 year fixed term contract drawing from the existing HRA capital budget for disabled adaptations.

### **Corporate and service priorities**

The report helps to meet the corporate priority People living well

### **Financial implications**

The proposed additional staffing costs are estimated to be £25,000 in 2020/21, £100,000 in 2021/22 and £75,000 in 2022/23. These costs will be capitalised and can be met by a forecast underspend in the HRA disabled adaptation budget for 2020/21 and will be incorporated into the HRA capital programme for disabled adaptations for 2021/22 and 2022/23.

**Ward/s:** All Wards

**Cabinet member:** Councillor Harris - Deputy leader and social housing

**Contact officers**

Rachel Omori Independent Living Manager

07769 234094

Kevin Ayers Home Improvement Team Leader

01603 212341

# Report

## Background

1. The Health and Social Care Act 2012 introduced Health and Wellbeing Boards (HWB). They have been established to promote integrated working among local providers of health and social care. The Care Act 2014 established the Better Care Fund (BCF) which is a pooled budget to facilitate this integration with the intention to keep patients out of hospital.
2. The HWB must develop a local plan on how the BCF will be spent.
3. Local authorities have a duty under the Housing Grants, Construction and Regeneration Act 1996 to deliver Disabled Facilities Grants to adapt people's homes to help keep them living independently. Money that would have traditionally come into the city council as a direct grant has now been pooled into the BCF in recognition of adaptations helping to avoid unnecessary hospital admissions and care home placements.
4. Adaptations in council homes are carried out separately from this integrated work.
5. In the city, the Council's home improvement team provides grants and loans to residents who own their own home, privately rent or are in housing association properties to help them to remain living independently.
6. This is a service makes use of disabled facilities grants (DFG) which are provided to adapt people's homes. Combined with other forms of help, including grants to facilitate hospital discharge and to prevent admission to hospital, smaller emergency grants and large home improvement loans all aim to allow residents to remain in their homes and live as independently as possible.
7. DFGs have been available for the past 30 years and the criteria for awarding a grant and what it can be used for are set out in statute and cover works up to £30,000.
8. DFG's are means tested and applicants may be required to make a contribution towards the cost of any works. Norwich City Council provide a separate discretionary grant that pays the first £5,000k of anyone's contribution regardless of income (£5,000k being the average cost of an adaptation).
9. The work of the home improvement team is nationally recognised as best practice for providing timely and holistic services to residents being highly commended in 2019 for the 'best adaptation service' at the national Healthy Home's awards.
10. Council tenants can request adaptations to their home from the city council when an adult social services occupational therapist has undertaken an

assessment and made a recommendation for adaptations to be provided. Adaptations are approved using the council's policy on adaptations.

11. The work is currently arranged by NPS Norwich (NPSN) and carried out by Norwich Norse Building Ltd (NNBL).
12. The independent living team which incorporates the home improvement team was established in September 2019 with the aim of offering a tenure neutral service to all residents including city council tenants and allowing tenants to access the high performing service that residents in the private sector currently experience.
13. When this team was established an occupational therapist (OT) post was created to assist with the delivery of adaptations for council tenants.

### **Timely delivery of adaptations**

14. Delivering adaptations in a timely manner is vital as they help people retain or give back their independence, reduce the need for costly care packages and avoid unnecessary hospital admittance or care home stays.
15. Someone receiving an adaptation to their home can expect to stay out of hospital or the need to have a care home placement for five years more than if they did not have an adaptation.
16. In Norfolk, benchmarking is carried out at a county wide level on the speed that residents get the help they need in the form of adaptations. This is measured from when people first ask for help to when the help is practically completed.
17. The average timescale across the whole of Norfolk is around 240 days. The timescale for council tenants is 220 days, whereas the timescale for private sector residents in Norwich is 100 days.

### **The current service provision for Owner Occupiers and those renting in the private sector:**

18. The city council adopted the Norfolk wide 'Integrated Housing Adaptation Team' (IHAT) model in July 2013. This co-locates adult social services staff including an occupational therapist within a single team delivering disabled adaptations for residents.
19. The Home Improvement Team comprises of City Council employed Team leader, Administrator, Technical officers and Case Workers, as well as an Occupational Therapist and OT assistant practitioner employed by Social services.
20. Caseworkers provide holistic help and support for private sector residents needing an adaptation, supporting them at a difficult time, advocating on their behalf and ensuring they fully understand the process and assistance available. They also provide support to all other officers involved in the

process of delivering an adaptation, ensuring the adaptation is delivered in a timely manner and freeing up professional officers (such as OT's and Technical Officers) time.

21. The team has access to a capital budget of £1.44m for 2020/21 and through this, applicants have access to several different grants including:

- Disabled Facilities Grant (DFG)
- Hospital Discharge Grant (a non means tested grant of up to £10k to aid discharge from hospital)
- Preventing Admission to Hospital Grant (a non means tested grant of up to £10k to prevent admission to hospital)
- Safe at Home Grant (A £2.5k grant for vulnerable people to provide small adaptations or emergency repairs)
- DFG top up grant (A grant for any applicant of a DFG to pay up to the first £5k of a calculated contribution.

The DFG is a statutory grant delivered by all local authorities in England and Wales. The other grants are discretionary grants exclusive to the residents of Norwich.

The funding for these grants comes via the county council through the Better Care Fund. The money awarded to the city council is exclusively for DFGs in the private sector however the grant can be spent on other forms of assistance (except council homes) as long as the county council is in agreement.

22. The customer journey for clients using the service is relatively straightforward particularly for DFGs. For the most part residents are supported and adaptations are delivered through the single team within the city council.

### **The current service provision for council tenants:**

23. Contractual arrangements and historic working practices mean that that a different arrangement oversees the delivery of adaptations for tenants with a number of different organisations involved, namely:

- The city council – who may be the entry point for a tenant asking for help
- Norfolk adult social services – produce adaptation recommendations through their occupational therapists
- NPS Norwich – review requests for adaptations, oversee the budget and instruct and oversee Norwich Norse Building Ltd (NNBL)
- Norwich Norse Building Ltd – survey, design and install the required adaptation

Unlike the private sector which has a single team helping residents, a tenant may have contact from a number of different people from the

organisations listed with the risk that support is disjointed, or is not tenant focussed.

24. A case working approach is not used to support the delivery of adaptations to council tenants and although the NNBL resident liaison officer will cover some aspects of the caseworker role, this is limited to liaison around the logistics rather than supporting the tenant throughout the process.

25. The recommendations in this report seeks to resolve this.

26. The budget for adaptations in council tenancies is £750,000 in 2020/21. By developing a tenure neutral approach there is a real opportunity to increase the support and adaptations made available to tenants.

27. Council tenants have access to a variety of works which are grouped as follows:

- Major Disabled Adaptions which are not means tested and follow the process described above
- Minor adaptions (such as grab rails) which are non means tested and are very straightforward for tenants to access

## **Future Demand**

28. With an ageing population demand for home adaptations is increasing. In Norfolk, OT recommendations have risen by 37% over the past year

29. Demand for adaptations for council tenants appears to be higher than in the private sector. For example, for the first 3 quarters of 2019/20 OT assessments have recommended an adaptation for 146 private sector residents compared to 187 for council tenants. This is summarised below, with a comparison with the service to private residents.

30. The chart below highlights the differences between adaptations carried out by the council in our own properties and the private sector

	Private Sector	Council Tenants
Demand for adaptations*	146	187
Budget	£1.44m	£750k
Timescale**	Circa 100 days	Circa 220 days
Awaiting installation pre Covid-19	0	Approximately 40
Awaiting installation now	13	Approximately 80
<p>* When comparing like for like period of first 3 quarters of 2019/20</p> <p>** From someone asking for assistance to practical completion of an adaptation</p> <p>*** Based on Pre Covid figures</p>		

## Conclusions.

31. Although the adaptations service for council tenants compares favourably with the rest of the county, there is an opportunity to bring it on par with the service we provide to people in the private sector.

Timely adaptations improve people's independence. A tenure neutral service employing case workers and adopting the model currently used in the private sector will help ensure that the speed of adaptations is improved, our approach is more person centred and easier for people to access.

## Recommendations for council adaptations

It is recommended that:

32. The current assistance for council tenants is enhanced with a suite of grants mirroring those offered for private sector residents, specifically:

- a. Disabled Facilities Grants
- b. DFG Top Up Grant
- c. Hospital Discharge Grants
- d. Preventing Hospital Admission Grants

33. The operating model of the home improvement team is replicated for council tenants so that they are offered the same high level of service that residents in the private sector receive.

34. To enable this change to the service, it is recommended to increase the HRA capital budget for disabled adaptations from £750k to £1.5m for the 2021/22 and 2022/23 financial years. This will be included within the budget proposals to be submitted later in the year, for approval by Council in February 2022.
35. Immediately Create one FTE Caseworker post and one FTE Senior Caseworker post initially on a 2 year fixed term contract drawing from the existing HRA capital budget for disabled adaptations.

## Integrated impact assessment



**NORWICH**  
City Council

The IIA should assess **the impact of the recommendation** being made by the report  
Detailed guidance to help with the completion of the assessment can be found [here](#). Delete this row after completion

### Report author to complete

<b>Committee:</b>	cabinet
<b>Committee date:</b>	09 September 2020
<b>Director / Head of service</b>	Bob Cronk/ Lee Robson
<b>Report subject:</b>	Home improvement team and disabled adaptations service
<b>Date assessed:</b>	16/06/2020

	Impact			
<b>Economic</b> (please add an 'x' as appropriate)	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
<b>Finance (value for money)</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Means testing tenants will be tenure neutral and ensure the most vulnerable are helped while those who can contribute will do so. This will ensure the council offers a tenure neutral service
<b>Other departments and services</b> <b>e.g. office facilities, customer contact</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	There will be minor changes to existing call scripts and processes
<b>ICT services</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Minor changes to Civica processes will be required
<b>Economic development</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Financial inclusion</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The means test ensures this however all tenants will be able to access up to £5k of discretionary grant to pay towards any calculated contribution
<b>Social</b> (please add an 'x' as appropriate)	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
<b>Safeguarding children and adults</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Caseworkers work closely with vulnerable residents and are trained to be aware and alert to any safeguarding concerns.
<b><u>S17 crime and disorder act 1998</u></b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Human Rights Act 1998</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Health and well being</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	It will help to increase the numbers of people who are able to continue to live healthy, independent, lives in their own homes

	<b>Impact</b>			
<b>Equality and diversity (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
<b>Relations between groups (cohesion)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Eliminating discrimination &amp; harassment</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Advancing equality of opportunity</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<b>Environmental (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
<b>Transportation</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Natural and built environment</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Waste minimisation &amp; resource use</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Pollution</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Sustainable procurement</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Energy and climate change</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>(Please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>

	Impact			
<b>Risk management</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

## Recommendations from impact assessment

### Positive

The recommendations set out in this report should positively ensure tenants contribute when appropriate to their adaptations while ensuring the most vulnerable are helped. It will ensure more people are able to continue to live independently in their own home and increase the potential of identifying safeguarding concerns.

### Negative

There are no negative impacts

### Neutral

### Issues

**Report to** Cabinet  
14 October 2020  
**Report of** Head of neighbourhood housing services  
**Subject** To award a contract for solar thermal water heating to social housing properties

**Item**

9

## KEY DECISION

---

### Purpose

To seek approval to award a contract for solar thermal water heating to social housing properties.

### Recommendations

To award the contract for the installation of thermodynamic hot water systems for housing properties 2020-21 to Impact Renewable Energy Ltd.

### Corporate and service priorities

The report helps to meet the corporate priority Great neighbourhoods, housing and environment

### Financial implications

The value of the contract will be up to a maximum spend of £500,000. Funding for this will be taken from the HRA capital budget allocated to improve energy efficiency of council owned homes.

**Ward/s:** Multiple Wards

**Cabinet member:** Councillor Harris - Deputy leader and social housing

### Contact officers

Lee Robson, head of neighbourhood housing services 01603 212939

Paul Venn – Interim Director, NPS Norwich Ltd 01603 227900

### Background documents

None

## Report

1. The councils stated ambitions in its strategy for the city's council housing is not only to make sure that homes are well maintained but that they are fuel efficient and cheap to run with low emissions and carbon use.
2. The installation of Thermodynamic hot water systems is one part of that approach.
3. Housing Thermodynamic hot water systems include panels which sit on the roof of a property. In addition to reducing the city's carbon footprint, the panels use the sun's thermal energy to provide some free hot water to the tenant all through the year.
4. To date, Norwich City Council has successfully installed over 700 thermodynamic hot water systems to its housing properties.
5. Installing thermodynamic hot water systems to housing properties throughout the city assists the council's objective of reducing fuel poverty.
6. In addition to any reduction in fuel poverty, it will reduce the risk of tenants falling into arrears due to rising energy costs. This may also release money into the local economy that would have otherwise gone towards fuel bills.
7. A procurement process was undertaken, commencing in August 2020. Three tenders were received. A tender evaluation exercise was completed which concluded that Impact Renewable Energy Ltd is the preferred supplier. Impact Renewable are the current contractor who have successfully delivered the programme of installations during 2019-20
8. The tendering supplier has delivered these requirements in previous years and the rates supplied are similar in comparison to tenders previously awarded for these works.
9. Based upon the tender submitted, officers anticipate that there will be approximately 130 thermodynamic systems installed during 2020-21. The installations will be targeted as far as possible to the tenancies identified as most at risk of fuel poverty and in need of energy efficient heating/water systems.

### Procurement process

10. The procurement exercise adhered to Norwich City Council's Contract Procedures in that it was conducted fairly, transparently and in an open and regularised way and which conformed to relevant legal requirements.

## Integrated impact assessment



**NORWICH**  
City Council

### Report author to complete

<b>Committee:</b>	Cabinet
<b>Committee date:</b>	14 October 2020
<b>Director / Head of service</b>	Lee Robson
<b>Report subject:</b>	To award a contract for Solar Thermal Water Heating to social housing properties
<b>Date assessed:</b>	September 2020

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	This procurement process ensures the Council achieves the best value for money. In comparison to previous tender returns, it is competitively priced.
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The thermodynamic panels can reduce energy bills and fuel poverty. Through employment of local labour, the project assists in social economic benefits for the city and county.
Financial inclusion	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	As above
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## Recommendations from impact assessment

### Positive

Reduced fuel bills therefore preventing fuel poverty, reduction in carbon emissions within the housing stock and for the city contributing to our overall reduction target.

### Negative

### Neutral

### Issues



**Report to** Cabinet

**Item**

14 October 2020

**Report of** Director of people and neighbourhoods

**Subject** Vehicle lease and future contract awards for Norwich City Services Limited

10

## KEY DECISION

---

### Purpose

To seek approval to award a vehicle lease contract for Norwich City Services Limited and to delegate future contract awards.

### Recommendation

To delegate authority to the chief executive officer as shareholder, in consultation with the cabinet member for resources and the cabinet member for safe and sustainable city environment;

- 1) to award a vehicle lease contract for the delivery of environmental services by Norwich City Services Limited; and
- 2) enter into other such contracts, that are reasonable and necessary to ensure the successful delivery of services from 1 April 2021 by the company.

### Corporate and service priorities

The report helps to meet the corporate priority Great neighbourhoods, housing and environment

### Financial implications

The company business plan has been refreshed to reflect the additional costs associated with this lease for vehicles. The costs will be included as part of the NCSL business plan which will be reported to Cabinet for decision in December.

The contract offers fleet management services as well as repairs and maintenance, therefore enabling the transfer from these budgets to cover the additional lease contract costs.

It is important to note that there is a financial risk to the Council if the NCSL contract is not awarded in accordance with the planned timetable.

**Ward/s:** All Wards

**Cabinet member:** Councillor Kendrick - Resources

**Contact officers**

Bob Cronk, Director of people and neighbourhoods

01603 989203

Hannah Simpson, Deputy section 151 officer

01603 989569

## Report

1. A report to consider the target operating model and latest business case for the delivery of the council's environmental, repairs and maintenance and asset and estate management services by Norwich City Services Limited (NCSL), was presented to Cabinet in July 2020.
2. A number of recommendations were agreed including establishing a board of directors for the wholly owned company, approval of the business case and target operating model, a recommendation to council to increase the capital programme to establish a depot, budgetary provision for tools and equipment, as well as a number of delegations to relevant directors to award contracts in consultation with the cabinet member.
3. Council agreed in July 2020 to increase the general fund capital programme by £2.780m, this included loan and equity financing to the company to establish a depot as well as budgetary provision for the council to purchase IT, tools and equipment.
4. To ensure that the new company is able to deliver the council's environmental Services from the 1 April 2021, it is necessary for the company to award contracts prior to the formal approval of the company business plan scheduled for December 2020.

## Background

5. As part of the mobilisation of the environmental services contract the company will need to secure sufficient tools, equipment and vehicles to enable the services to be delivered.
6. The council is proposing to purchase some tools, equipment and vehicles from the current provider Norwich Norse Environmental Limited. However, the company will need to acquire new equipment including at this stage a number of vehicles the procurement of which is being undertaken by the council on behalf of the company.
7. Forty-five light commercial vehicles of various specifications are required all to be supplied on a contract lease basis for a five-year period, with service, maintenance and repair (SMR) and fleet management included. The fleet management services will be for a 12-month period initially, to be reviewed on an annual basis during the period of the lease.
8. The specification was developed in detail in conjunction with officers from Norwich Norse Environmental Limited and environmental services as the client side to ensure that the specification suited service delivery requirements.
9. An invitation to quote was issued by Norwich City Services Ltd (NCSL) using the Crown Commercial Services (CCS) framework. Of the seven suppliers on this framework two expressions of interest and one tender submission was received and assessed by a panel of officers.

10. The recommended supplier, Venson Automotive Solutions Limited was allocated a score of 85 out of a total of 100. Reassurance of the assessment process was provided by Crown Commercial Services who provided additional insight to the submission by Venson Automotive Solutions Limited. Through this process, confirmation was provided that the prices submitted were competitive and comparable with similar vehicles that could be secured.
11. As part of the development of the specification and tender, the use of electric vehicles was considered as an option.
12. At the current time, there are limited electric options for the specialist vehicles required for the environmental services contract and within the budget envelope to deliver the service contract and construct the depot. However, there is currently a pilot in progress with one electric vehicle with Norwich Norse Environmental which is receiving good feedback.
13. The team are looking into costs and options for procuring four of these vehicles and installing electric points at the depot - the ducting for charging points is being installed as part of the existing depot build contract. If the pilot is successful, we would be looking to introduce some electric vehicles into the fleet where it is financially viable to do so.
14. The use of electric vehicles does need to be trialled prior to any long-term commitment particularly given the range of work undertaken under this contract and that electric commercial vehicles, particularly for non-standard vehicles is still new, though new options are emerging. The vehicle in use in the parks already requires an adjustment as it is too quiet for use in public areas, so an additional function is required to allow them to be heard. As the technology continues to develop it is essential to take a measured approach to any fleet replacement programme based on battery power and cost.
15. The total cost of the award is £293,742 per annum with a total contract value for 5 years being £1,468,710.
16. As the company board is not as yet in place and prior to the NCSL business plan being approved, the council is required to authorise the Norwich City Services Limited company board to award a contract for the vehicle leasing contract and to underwrite the costs of that award.
17. In addition, cabinet are requested to delegate authority to the chief executive officer as shareholder, in consultation with the cabinet member for resources and the cabinet member for safe and sustainable city environment to award the necessary contracts for the provision of environmental services from 1 April 2021.

## Integrated impact assessment



**NORWICH**  
City Council

The IIA should assess **the impact of the recommendation** being made by the report  
Detailed guidance to help with the completion of the assessment can be found [here](#). Delete this row after completion

### Report author to complete

<b>Committee:</b>	Cabinet
<b>Committee date:</b>	14 October 2020
<b>Director / Head of service</b>	Director of people and neighbourhoods
<b>Report subject:</b>	Vehicle lease and future contract awards for Norwich City Services Limited
<b>Date assessed:</b>	30 September 2020

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Ensures the award of a contract is timely and achieves best value
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial inclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
Equality and diversity (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Relations between groups (cohesion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Eliminating discrimination & harassment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advancing equality of opportunity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Environmental (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Natural and built environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pollution	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The new vehicles will offer improvements in fuel consumption / emissions compared to the current fleet.
Sustainable procurement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Energy and climate change	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The new vehicles will offer improvements in fuel consumption / emissions compared to the current fleet
(Please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments

	Impact			
<b>Risk management</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## Recommendations from impact assessment

### Positive

The procurement makes use of a procurement framework which achieves best value and contributes to the mobilisation of the environmental services contract by Norwich city services limited.

### Negative

### Neutral

### Issues

**Report to** Cabinet  
14 October 2020  
**Report of** Director of strategy, communications and culture  
**Subject** IT Contract for Digital Development Platform (Outsystems)

**Item**

11

## KEY DECISION

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### Purpose

To seek approval for the award of a new contract for the provision of a digital development platform to replace the current LGSS service

### Recommendation

To delegate authority to the director of strategy and culture in consultation with the cabinet member for resources to award a contract for the ongoing provision of a digital development platform, ensuring continuation of existing services and the opportunity to expand and build on the council's digital strategy.

### Corporate and service priorities

The report helps to meet the corporate priority People living well

### Financial implications

There is an existing agreement with LGSS, dating from the Partnering and Delegation Agreement (PDA) period, permitting the council shared use of the LGSS Outsystems platform. This costs the council £48,100 for the period 1/4/2020 to 31/3/2021. A Norwich City council specific platform has been estimated at £158,000 pa for a period of 4 years.

Annual costs for the new environment will be funded from existing budgets, £110,000 from the IT Transformation budget and £48,000 offset against income received from Norfolk County Council to manage parking permits and enforcement on their behalf.

The new agreement includes exclusive access to the Outsystems expert teams and library of existing solutions (and all future solutions) at no additional cost.

**Ward/s:** All Wards

**Cabinet member:** Councillor Kendrick - Resources

### Contact officers

Nikki Rotsos, Director of strategy and culture 01603 212211

Paul Gooch, Contract support and applications manager, IT Services 01603 987580

## **Background documents**

None

# Report

## Background

- 1) The Outsystems platform was originally selected as a strategic choice of digital development platform by LGSS while the Partnering and Delegation Agreement (PDA) with the council was still in place.
- 2) Subsequently, the council chose to begin development of our own digital solutions using the LGSS platform.
- 3) This development activity was carried out by Norwich-based IT Services staff who, following the termination of the PDA, have since transferred into the council.
- 4) The digital solutions already in productive use by the council are the online parking permit application and renewal process, including the 'virtual' permit facility, as well as the Food and Safety Team's hygiene inspections app.
- 5) The online permit application and renewal process is a fully digital end-to-end process including automated checking of entitlement and up-front payment, with the only intervention from council staff being the final approval of the application
- 6) The inspection app allows the team to complete their inspection and submit the report all from their tablet devices whilst on the food premises. This results in the inspection outcome being update on back-office systems automatically and a fully compiled report generated, ready for the inspector's final approval before being issued.
- 7) Multiple opportunities for transformation and efficiencies have already been identified both to support the council's existing transformational ambitions and as part of the evaluation of the services returning to the council from the Norse joint venture companies. Examples of these include:
  - a. Developing a 'Golden Record' of customer details to allow staff to have access to complete, accurate and up to date information about customers at all times
  - b. Reliable and secure access to systems, data and processes whether in the office, at home or working 'in the field'.
  - c. Automated checking and system updating for changes in circumstances, especially a change of address.
  - d.
- 8) A combination of the termination of the PDA and the scheduled disintegration of LGSS has resulted in a situation whereby the existing Outsystems platform will cease to be available to the council, either to continue using these for existing services or to develop new digital solutions.
- 9) The one-year agreement with LGSS allows continued shared access to and use of the LGSS Outsystems platform until the end of March 2021.

- 10) There is no option to continue using the LGSS platform after that date. An alternative is required to ensure existing services continue to be available to citizens and staff, and that the council has digital development capacity going forward.
- 11) A solutions architect has been engaged to evaluate the digital development options available to the council and has concluded that Outsystems continues to be the most suitable option available.
- 12) The architect has highlighted that establishing a specific Outsystems platform for the council:
  - a. Addresses the need to ensure existing services continue to be available to staff and customers without interruption
  - b. Reduces the complexity and risk of the exit from the LGSS platform
  - c. Increases the opportunities for new solutions to be developed quickly
  - d. Ensures exclusive ownership and management a digital development platform for the council
- 13) The architect has highlighted that establishing a specific Outsystems platform for the council:
  - a. Addresses the need to ensure existing services continue to be available to staff and customers without interruption
  - b. Reduces the complexity and risk of the exit from the LGSS platform
  - c. Increases the opportunities for new solutions to be developed quickly
  - d. Ensures exclusive ownership and management a digital development platform for the council

## **Procurement Process**

- 14) The expiry of the current agreement with LGSS requires an alternative solution.
- 15) It is possible to use the government's G-Cloud, online procurement framework to set up the council's own dedicated platform and associated items.

## **Timescales**

- 16) Delegated authority will allow the new procurement to replace the current agreement with LGSS, due to expire at the end of March 2021.
- 17) Establishing the new platform and migrating existing developments from there to the new platform will be completed within a timescale of 2-3 months
- 18) The migration, assuming delegated approval is granted, will be scheduled to be complete by the end of December 2020

## Integrated impact assessment



**NORWICH**  
City Council

### Report author to complete

<b>Committee:</b>	Cabinet
<b>Committee date:</b>	14 October 2020
<b>Director / Head of service</b>	Nikki Rotsos, Director of strategy and culture
<b>Report subject:</b>	IT contract renewal – Outsystems (digital development platform)
<b>Date assessed:</b>	6 October 2020

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Increase in support costs
Other departments and services e.g. office facilities, customer contact	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Online permit renewal/application process continues. Opportunity for more and similar developments
ICT services	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Consistency of platform for ongoing development
Economic development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial inclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
<b>Equality and diversity (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Relations between groups (cohesion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Eliminating discrimination & harassment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advancing equality of opportunity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Environmental (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Natural and built environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Energy and climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>(Please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
Risk management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

## Recommendations from impact assessment

### Positive

Any alternative solution would prove more costly both in terms of actual cost (software, re-training, re-writing existing solutions) and the diversion from continued development arising from the choice of an alternative. By remaining with Outsystems, the risk associated with the change and potentially interruption to existing services, is avoided.

We will be able to take copies of the other code stored in the existing LGSS platform, avoiding the need to generate these ourselves.

In engaging directly with the supplier, we have direct access to experts, forums and the wider (thriving) user community, previously only available via LGSS.

The time and effort already invested in becoming experts in the use of the software will not have been wasted. The knowledge and experience will be used to increase the rate of new developments, delivering more and better solutions for the council

### Negative

Overall, this will result in an increased cost to the authority for the provision of the same platform/software, but there is little alternative given the short term of the arrangement with LGSS and unavoidable cessation of the existing service. We have been offered the newest pricing options from the supplier that are more favourable than those currently being paid to them by LGSS

### Neutral

### Issues

None

**Report to** Cabinet  
14 October 2020  
**Report of** Director of place  
**Subject** The award of contract for cash collections.

**Item**

12

## KEY DECISION

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### Purpose

To seek approval to award a contract for Cash collections.

### Recommendation

To award the contract for cash collections to Security Plus Limited for a four year period from 01 April 2021 to 31 March 2025.

### Corporate and service priorities

The report helps to meet the corporate priority Great neighbourhoods, housing and environment

### Financial implications

Cash collections currently cost approx. £120,000 for the on street pay and display machines and the off street car parks. These are financed through the on and off street enforcement budget.

**Ward/s:** All Wards

**Cabinet member:** Councillor Stonard - Sustainable and inclusive growth

### Contact officers

Joanne Deverick - Parking and markets service manager 01603 989320

Andy Watt – Head of city development 01603 989618

### Background documents

None

# Report

## Background

1. A corporate cash collection contract was adopted by the council in 2013, collections are required across the council in the following areas:
  - Parking services, on and off street collections including multi storey car parks
  - Finance, although the council is becoming increasingly 'cashless' there is still a limited requirement at City Hall
  - Leisure services, at the Norman Centre
2. Market pricing for cash collections has increased. With this in mind, savings can only be realised by reducing the number of collections required. The impact of cashless processes across the council has already reduced with collections from City Hall and the Norman Centre from weekly to four weekly
3. Cashless payments for both on street and off street car parks will be introduced sometime in 2021; likewise, there have been changes to customer behaviour in response to Covid19. In multi-storey car parks, cashless payments are used for 70% of transactions, so the reductions in cash collections are likely to be significant over the contract term. These introductions are anticipated to significantly reduce the contract value over the contract term
4. The ability to future proof the contract and reduce the number of collections will be built in to the contract. Sixth monthly collection schedules will be submitted, reflecting any changes in requirements as we move toward cashless payments. Scope in the contract allows a maximum value of £400,000 to accommodate approximately £10k per annum of potential collections arising from Norwich City Services Ltd, but again it is not envisaged this element will be required as they will be cashless.

## Value

5. Cash collections currently cost approx. £120,000 per annum. The budget is primarily met from parking services, with the cost of collections from on street pay and display ticket machines deducted from Norfolk County Council surplus. Parking cash collections are split between off street car parks (45%), multi-storey car parks (27%) and on street parking (28%) of the total cost, less than £1k per annum is split between the Norman Centre and City Hall.
6. Estimated value of the service from Security Plus Ltd is £90k per annum, totaling approximately £360k over the full four years of the contract. This will deliver an anticipated reduction in contract value of £115k over the four years compared to the current contract. Following deductions from County, the anticipated saving to the council will be £25,200 per annum at the current cash collections levels.

7. Approximately £10k per annum is allowable for potential Norwich City Services collections that will be met through recharge back to the company.
8. Given the move to cashless payments options for parking, it is expected that savings will be significantly greater than £19.5k. The contract will allow for re-assessment of value for money services six monthly, and a break clause after an initial term of two years.

### **Procurement process**

9. The route to market was via a procurement framework, jointly run by EEPO and CCS. Under this framework suppliers are pre-assessed for quality and standardised catalogue process are used. Only three regional suppliers are available via the framework.
10. All three suppliers were assessed for the contract. As quality was pre-assessed the evaluation placed 100% weighting on the price quoted
11. A desktop evaluation was made using 100% pricing was conducted with the only three suppliers available regionally.
12. Using a reduced cash collection schedule, the following pricing was returned:

<b>Security Plus Limited</b>	<b>£89,582</b>
<b>BDI Securities UK Ltd</b>	<b>£95,035</b>
<b>G4S Cash Solutions (UK) Ltd</b>	<b>£105,443</b>

13. The most economically advantageous supplier is identified as Security Plus Limited.

## Integrated impact assessment



**NORWICH**  
City Council

The IIA should assess **the impact of the recommendation** being made by the report

Detailed guidance to help with the completion of the assessment can be found [here](#). Delete this row after completion

### Report author to complete

<b>Committee:</b>	Cabinet
<b>Committee date:</b>	14 October 2020
<b>Director / Head of service</b>	Graham Nelson, Director of Place
<b>Report subject:</b>	The award of contract for cash collections
<b>Date assessed:</b>	28 September 2020

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Contract will ensure that it is value for money for the city council and will include clauses for price reductions when cash volumes drop
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Financial inclusion	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Health and well being	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
Equality and diversity (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Relations between groups (cohesion)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Eliminating discrimination & harassment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advancing equality of opportunity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Environmental (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Transportation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Natural and built environment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Waste minimisation & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Sustainable procurement	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Energy and climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(Please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Risk management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Recommendations from impact assessment
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Positive
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Contract will ensure that it is value for money for the city council and will include clauses for price reductions when cash volumes drop
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Negative
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None
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Neutral
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None
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Issues
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None
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**Report to** Cabinet  
14 October 2020  
**Report of** Head of city development services  
**Subject** Managing Assets (Housing)

**Item**

13

## KEY DECISION

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### Purpose

To consider the disposal of the land detailed in this report.

### Recommendation

To approve the disposal of land identified in the exempt appendix to this report to support the development of six affordable homes under the Local Government Act 1972: General Disposal Consent 2003.

### Corporate and service priorities

The report helps to meet the corporate priority Great neighbourhoods, housing and environment

### Financial implications

The financial implications are detailed in the exempt appendix to this report.

**Ward/s:** Lakenham

**Cabinet member:** Councillor Harris - Deputy leader and social housing

Councillor Maguire – Safe and Sustainable City Environment

### Contact officers

Andrew Turnbull Interim housing development manager 01603 989607

Andy Watt Head of city development services 01603 989618

Chris Hancock Housing partnerships officer 01603 989397

### Background documents

None

# Report

## Background

1. In August, the Ministry of housing, communities and local government (MHCLG) announced that additional funding was available for rough sleeper funding under their Next Steps Accommodation Programme (NSAP). The government released their prospectus in response to their call to get all rough sleepers accommodated during the initial Covid-19 crisis lock down.
2. The overall objectives of NSAP is:
  - Reduce rough sleeping and no return to it – providing accommodation to develop a permanent solution to rough sleeping.
  - As Covid-19 continues rough sleepers are kept safe where they can self-isolate
3. Proposals were co-designed with our rough sleeper advisor from MHCLG, Broadland HA and Pathways and must have:
  - An assessment of health/care and support needs of all the people we have accommodated during the crisis
  - Focus on all rough sleepers including those people who are long term repeat cases
  - Identified how support services are necessary beyond what is currently in place
4. There are two funds available:
  - a. £105m funding for immediate revenue support in 2020-21 (this must be spent in this financial year) and can include:
    - Funding for accommodation to help people self-isolate (including 12 weeks accommodation funding for people with no recourse to public funds)
    - Additional support requirements to help people settle into accommodation
    - Cover additional winter costs for housing rough sleepers
  - b. £161m funding (of an overall pot of £433m available over four years) to purchase the following types of accommodation for rough sleepers:
    - Purchase and repair of properties on the open market
    - Refurbishment and repurposing of existing stock
    - Private sector lease arrangements
    - Development and new build.
5. Norwich City Council has submitted bids for both funds.
  - a. For the immediate funding, we have submitted a bid for a total of £217,350 to support the provision of emergency accommodation, access to the private rented sector, funds to spot purchase temporary accommodation, tenancy set-up costs, funds to reconnect rough sleepers with their place of origin and funds to support the provision of indoor 7-day access to food. MHCLG has confirmed that they are minded to award all of this bid subject to final due diligence.

- b. For the second fund, in partnership with Broadland Housing Association, we submitted a bid for £1.222m of capital funding for 2020/21 to provide ten properties purchased off the open market and a further six properties developed as modular construction on land owned by the council. In addition, a bid was made for £281.5k of revenue funding to provide two integrated housing and care navigator (IHCN) posts, hosted by St Martins as part of the Pathways team, to provide support to these properties until 2024 and a further £140.7k for an IHCN to provide floating support to the wider Pathways resettlement team.

6. The proposed programme for the second fund is to secure and develop the following:

Bid name	Number of homes	Total capital requested	Total revenue requested to March 2024	Longstop date for completion
Norwich Street Properties	10	£790,000	£175,940	31 March 2021
Norwich Modular Scheme	6	£432,000	£105,562	31 March 2021

7. MHCLG have indicated this week that they are minded to fund the bid for the capital funding of the 16 properties and the 2 IHCN posts associated with these, subject to final due diligence. We are awaiting further decision on the third IHCN post. The timescale for spending the money is very tight with practical completion of any development or acquisition required by the end of March 2021.

## **The Land**

8. The council has identified land that would be suitable to support the development of six 1-bedroom flats. The details of the land and proposed disposal are included in the exempt appendix to this report.
9. BHA have committed to keeping rents low on the properties being built and purchased. Whilst the rents are above the calculated social rent level they are below the 80% of market rents required under the affordable rent regime.
10. BHA will need to seek planning permission for the site so the disposal will be subject to planning approval.
11. In order to achieve the practical completion of the new dwellings by the March 2021 deadline BHA will be adopting a modular construction solution. This also offers the council learning possibilities on adopting this method ourselves for future projects.

12. Should the timescale not be achieved, the council as an alternative option, would look to utilise the funding for BHA to purchase an additional six dwellings in this financial year and look to bid for new-build in the future years of the Next Steps funding rounds.

### **Recommendation**

13. Cabinet is recommended to approve the disposal of the land detailed in this report under the Local Government Act 1972: General Disposal Consent 2003 at nil value to Broadland Housing Association, subject to planning approval, to support the development of 6 new affordable dwellings

## Integrated impact assessment



**NORWICH**  
City Council

The IIA should assess **the impact of the recommendation** being made by the report  
Detailed guidance to help with the completion of the assessment can be found [here](#). Delete this row after completion

### Report author to complete

<b>Committee:</b>	Cabinet
<b>Committee date:</b>	14 October 2020
<b>Director / Head of service</b>	Andy Watt, Head of City Development Services
<b>Report subject:</b>	Managing Assets (Housing)
<b>Date assessed:</b>	1 October 2020.

	Impact			
Economic (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Finance (value for money)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	As amenity land the land currently generates no income. The land in question would be a liability in terms of grounds maintenance.
Other departments and services e.g. office facilities, customer contact	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
ICT services	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Economic development	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	This project will provide employment opportunities, opportunities for local contractors and businesses and will generate local spending for the benefit of the wider economy. Providing more housing is important in supporting sustainable economic growth and prosperity.
Financial inclusion	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Providing additional affordable housing will advance financial inclusion by helping to improve housing affordability for homeless residents.
Social (please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Safeguarding children and adults	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Building more affordable homes to meet needs will help provide accommodation for vulnerable adults who may otherwise be rough sleeping.
<u>S17 crime and disorder act 1998</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Human Rights Act 1998	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	<b>Impact</b>			
<b>Health and well being</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The provision of sufficient and decent quality housing is essential to ensuring decent levels of health and well-being. Floating support will also be provided to tenants to assist with their health and well-being and assisting with independent living.
<b>Equality and diversity (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
<b>Relations between groups (cohesion)</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Eliminating discrimination &amp; harassment</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Advancing equality of opportunity</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Environmental (please add an 'x' as appropriate)</b>	<b>Neutral</b>	<b>Positive</b>	<b>Negative</b>	<b>Comments</b>
<b>Transportation</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Natural and built environment</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The proposal will be developed utilising modern methods of construction and enhance the built environment of this land.
<b>Waste minimisation &amp; resource use</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Modern methods of construction are shown to minimise waste and resources compared to traditional construction.
<b>Pollution</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>Sustainable procurement</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Impact			
Energy and climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(Please add an 'x' as appropriate)	Neutral	Positive	Negative	Comments
Risk management	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Disposal of this land for affordable housing delivery will minimise future liabilities relating to maintenance.

Recommendations from impact assessment
<p><b>Positive</b></p> <p>Overall, the provision of more affordable housing in the city, specifically to help address homelessness and rough sleeping has a positive impact upon the health and well-being of residents. There will also be economic benefits for contractors working on the development. The use of vacant amenity land to provide affordable housing is a prudent use of council assets.</p>
<p><b>Negative</b></p>
<p><b>Neutral</b></p>
<p><b>Issues</b></p>

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