



Council

Members of the council are hereby summoned
to attend a non-decision making meeting of the Council to debate the business on
the agenda set out below on

Tuesday, 20 July 2021

19:30

The meeting is to be held remotely and will be livestreamed on the Council's
YouTube channel.

Agenda

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1 Public questions/petitions

To receive questions / petitions from the public.
Please note that all public questions and petitions must be
received by the committee officer detailed on the front of the
agenda by **10am on Tuesday 20 July**

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

2 Lord Mayor's announcements

3 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)

4 Minutes

5 - 32

To approve the accuracy of the minutes of the meeting held
on 29 June 2021.

5 Questions to cabinet members / committee chairs

(A printed copy of the questions and replies will be available at the meeting)

6 Adjustments to Capital Programme 2021-22 33 - 38

Purpose: To seek approval for adjustments to the capital programme to provide loan finance and share capital to Norwich finance and share capital to Norwich Regeneration Ltd and to provide the necessary funding to proceed with the development of the Kings Arms Public House site at 100 Mile Cross Road.

7 Greater Norwich Local Plan (GNLP) – Submission to the Secretary of State for Independent Examination 39 - 102

Purpose: To agree to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination.

8 Members Code of Conduct and Complaints Hearing Procedure July 2021 - Update 103 - 118

Purpose - To consider revising the Member Code of Conduct in light of the LGA Model Code of Conduct and the findings of the Committee for Standards in Public Life.

9 Annual report of the audit committee 2020-21 119 - 134

Purpose - This report presents the Annual Report of the Audit Committee 2020-21, appended at Appendix A, to council.

10 Motions

To consider motions for which notice has been given under the council's constitution.

(The wording for motions received will be published in due course.)



Annabel Scholes
Executive director of corporate and commercial services

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Information for members of the public

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

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



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



Item 4

Minutes

COUNCIL

18:30 to 21:30

29 June 2021

Present: Councillor Maguire (Lord Mayor), Ackroyd, Bogelein, Brociek-Coulton, Button, Carlo, Champion, Driver, Davis, Everett, Fulton-McAlister (E), Fulton-McAlister (M), Galvin, Giles, Grahame, Hampton, Harris, Haynes, Huntley, Jones, Kendrick, Lubbock, Maxwell, Osborn, Packer, Peek, Price, Ryan, Sands (M), Sands (S), Schmierer, Stonard, Stutely, Thomas (Va), Thomas (Vi), Waters, Wright and Youssef

Apologies: Councillors Oliver and Manning

1. Lord Mayor's Announcements

The Lord Mayor introduced the meeting and set out practical arrangements for the meeting.

He thanked those councillors who had stood down in May and welcomed newly elected councillors.

2. Declarations of Interest

Councillor Brociek-Coulton, declared an other interest in motion 9(b), as manager of Silver Road Community Centre which had receive funding from the Holiday Activity and Food programme.

During the debate on item 9(b) Motion: Right to food, Councillor Haynes declared an other interest due to being in receipt of school meal vouchers.

3. Public Questions/Petitions

Two public questions had been received. The first was from Mr James Packham:

Mr Packham asked the cabinet member for sustainable and inclusive growth the following question:

"In relation to the council's planning application for hard tennis courts at Heigham Park the council did not carry out a pre-application consultation with local residents. This is contrary to Norwich City Council's policy as stated on p.24 of: Statement of Community Involvement for Norwich - A code of practice for involving the community in planning issues, November 2016 (amended September 2020). Subsequently, once the council's plan had been submitted and then re-submitted, the plan received 120

formal objections, mainly from local residents, as against 10 letters in favour. The council did not take serious notice of these objections and approved its own application. Local residents to Heigham Park remain very much against the council's plan and are left with minimal faith in the planning process. Will the council now consider carrying out a proper and fair consultation that seeks to understand and leverage the views and wishes of local residents?"

Councillor Stonard, gave the following response:

"The Statement of Community Involvement was included in the council's planning application, describing the communications plan for Norwich Parks Tennis expansion project and arrangements for consultation around proposals for Heigham Park, including discussing outline proposals with Friends of Heigham Park and Heigham Park Tennis Club. A technical recommendation from the Lawn Tennis Association detailing layout and lighting was shared with the groups, who were invited to raise issues before submission.

Before that the council (as applicant) consulted with the Gardens Trust, meeting on site with the drawings, with revisions being made following their objections to the original application. The proposals were revised following this meeting, taking on board the Trust's comments.

The consultation complied with all requirements in force at the time.

Delivery of the project is at an advanced stage and having started there is no requirement for any further consultation as part of the Planning process."

By way of a supplementary question, Mr Packham asked how the council could contemplate spending a quarter of a million pounds without asking people what they wanted through fair and proper consultation.

Councillor Stonard replied that proper procedures was followed through consultation which gave people a chance to comment on the planning issues. All comments received were weighed against planning regulations and planning law. Informal consultations by third parties were not part of the formal process. The council had gone through all legal processes and there was no reason to revisit the matter.

Mr Anthony Mullan to ask the cabinet member for health and wellbeing the following question:

"The council's proposed development of three hard tennis courts to replace the around ten grass courts at Heigham Park was originally conceived in 2017, or before. Much has changed since the proposal was approved, not least peoples' understanding of, and appreciation for, access to open green spaces in the city. The council has recently published its Environmental Strategy and its Covid Blueprint for recovery. Does the council believe that the proposed hard courts development is a necessary expenditure and completely aligned with its own latest strategic guidelines?"

Councillor Packer, the cabinet member for health and wellbeing gave the following response:

"The corporate priorities which the project aimed to deliver are relevant.

Under the priority - People Living Well - the provision of affordable tennis is aimed at reducing inequalities in the city by addressing social and financial exclusion by delivering affordable access to high quality facilities (£35 per household per year).

The grass courts at Heigham Park offered minimal biodiversity. The project will deliver new facilities that allow access to a larger area of the park for the public and provide an opportunity to increase biodiversity. Our proposals for this area will be developed in consultation with the park's users.

The project at Heigham Park will deliver the Environmental Strategy's Action Plan commitments to

- a) investigate the potential for managing some intensively-managed grass areas under involving fewer cuts per year and
- b) continue to involve local communities in the management of their local parks, natural areas and open spaces"

Mr Mullan asked the following supplementary question:

Regarding the proposed expenditure, he understood that the project had cost £260,000 but a response he had received to a Freedom of Information had stated that no detailed breakdown of costs was held. He asked if there was a revised cost in which the public could have confidence and what the rationale was for reducing the number of courts from ten to three.

Councillor Packer replied that he had full confidence in the information that had been provided by officers. Where grass courts were available for some months, all weather courts were available all year round which would help with accessibility and take up of use of the courts.

4. Minutes

RESOLVED to agree the accuracy of the minutes of the meetings held on 16 March and 24 May 2021.

5. Questions to Cabinet Members/Committee Chairs

The Lord Mayor said that sixteen questions had been received from members of the council to cabinet members/committee chairs for which notice had been given in accordance with the provisions of the council's constitution.

The questions are summarised as follows:

Question 1	Councillor Manning to the cabinet member for safer, stronger neighbourhoods on private renter protection.
Question 2	Councillor Button to the leader of the council on the installation of central heating at Templemere.
Question 3	Councillor Huntley to the cabinet member for sustainable and inclusive growth on Rayne Park.
Question 4	Councillor Oliver to the leader of the council on the Pathways scheme.

Question 5	Councillor Peek to the leader of the council on the delivery of eco-friendly homes.
Question 6	Councillor Giles to the sustainable and inclusive growth on the East Norwich development.
Question 7	Councillor Bogelein to the cabinet member for health and wellbeing on a Biodiversity Strategy.
Question 8	Councillor Galvin to the cabinet member for resources on questions to council deadlines.
Question 9	Councillor Youssef to the cabinet member for health and wellbeing on the Pesticide Action Network.
Question 10	Councillor Schmierer to the leader of the council on election materials.
Question 11	Councillor Grahame to the cabinet member for resources on parking fees.
Question 12	Councillor Carlo to the cabinet member for sustainable and inclusive growth on Anglia Square.
Question 13	Councillor Osborn to the cabinet member for resources on Community Municipal Investment Bonds
Question 14	Councillor Haynes to the cabinet member for resources on estates aesthetics programme underspend.
Question 15	Councillor Lubbock to the cabinet member for health and wellbeing on parking at Eaton Park.
Question 16	Councillor Wright to the cabinet member for health and wellbeing on the closure of the Tourist Information Centre.

(Details of the questions and responses were made available on the council's website prior to the meeting, and are attached to these minutes at Appendix A, together with a minute of any supplementary questions and responses.)

6. Appointment of a Monitoring Officer

Councillor Kendrick moved and Councillor Mike Sands seconded, the recommendations in the report.

Following debate, it was:

RESOLVED, unanimously to approve the appointment of Leah Mickleburgh as Monitoring Officer for Norwich City Council.

7. Appointments to outside bodies

The Lord Mayor highlighted that an updated version of appendix A had been circulated to members and published on the council's website.

Councillor Kendrick moved and Councillor Waters seconded, the recommendation in the report.

Following debate, it was **RESOLVED**, unanimously, to:

- 1) Make appointments to outside bodies for 2021-22 as set out in appendix A to the report; and

- 2) Delegate to the executive director of corporate and commercial services, in consultation with the leaders of the political groups, to make any changes to the appointments arising during the year.

8. Annual report of the scrutiny committee

Councillor Wright moved and Councillor Matthew Fulton-McAlister seconded the recommendations in the report.

Following debate, it was **RESOLVED**, unanimously, to approve the annual report of the scrutiny committee.

9. Motions

(Notice of the following motions, 9a to 9e as set out on the agenda, had been received in accordance with the council's constitution.)

9(a) Motion: Advertising

The following amendments from Councillor Waters had been received.

Replacing “**devise**” with “**develop and enhance**” in resolution 1)

Inserting “**Review and**” at the start of resolution 2)

Inserting “**within legal restrictions**” after “**to ensure**” in resolution 2)

Inserting “**to which we as a city council can influence**” after “**to our communities**” in resolution 3)

The mover of the motion had indicated that he was willing to accept the amendments and as no other member objected, they became part of the substantive motion.

Councillor Schmierer moved and Councillor Osborn seconded the motion as amended.

Following debate, it was **RESOLVED**, unanimously, that:

“Paid promotion of activities or products that are potentially harmful to mental or physical health or the environment, such as junk food, gambling, alcohol or the most polluting forms of transport, are very common on our television screens, radios, social media feeds and across a variety of out of home advertising media.

There is a strong precedent for precluding such forms of advertising. Most forms of tobacco advertising and sponsorship were banned from 2003 (e.g. on billboards and in printed publications): tobacco sponsorship of international sport was banned from 2005.

Other councils, including Bristol, have developed more ethical advertising policies.

This council **RESOLVES** to:

- 1) ask cabinet to develop and enhance an advertising strategy for Norwich City Council which recognises the harmful effects that junk food, environmentally polluting products and activities, payday lenders, gambling and alcohol can have on local residents. This policy would then be used to ascertain which companies and products the council wishes to associate itself with and support, including local businesses, and ban harmful products, companies or services from being advertised in council owned premises, e.g. car parks, in our communications, or from sponsoring council organised events.
- 2) Review and update the council's planning policy to ensure, within legal restrictions, that new advertising hoardings cannot be installed within the proximity of schools.
- 3) Ask cabinet to work with partners to phase out all forms of advertising, especially via outdoor media across the city, that are potentially harmful to our communities, to which we as a city council can influence, such as gambling, alcohol, junk food and environmentally damaging products.
- 4) Write to the Secretary of State for Digital, Culture, Media and Sport, asking for a ban on such forms of unethical advertising nationally and asking to follow the lead of Italy, which in 2018 introduced a 'Dignity Decree' that banned all advertisements for gambling services across all channels in the country, meaning gambling advertisements were no longer allowed on television, radio, print media, the internet, or any other public forum in Italy.

9(b) Motion: Right to food

(Councillors Brociek-Coulton and Haynes had declared an other interest in this item.)

Councillor Huntley moved and Councillor Davis seconded the motion.

Following debate, it was **RESOLVED**, unanimously, that:

“The current National Food Strategy (NFS) review, the first since that commissioned by the post-war Labour government, represents a rare opportunity to influence the approach, practices, and direction of future food planning. Alongside addressing acute food poverty, including child hunger, this strategic review must call for a fundamental ‘right to food’, to be enshrined in law, thereby ensuring that government obligations on food poverty are clear and government bodies can be held to account for violations of this right, as argued for by the Right to Food campaign in order to address the 11 million U.K. residents experiencing food poverty.

The recommendations outlined in Part 1 of the NFS report include:

- 1) expanding the eligibility for the Free School Meal scheme to include every child (up to the age of 16) from a household where the parent or guardian is in receipt of Universal Credit or equivalent benefits
- 2) extending the Holiday Activity and Food programme to all areas of England, so that summer holiday support is available to all children in receipt of free school meals

3) increasing the value of the Healthy Start vouchers to £4.25 per week, and expand the scheme to every pregnant woman and to all households with children under four where a parent or guardian is in receipt of Universal Credit or equivalent benefits

4) the support of supermarkets and convenience stores (with the support from the Association of Convenience Stores) in supplementing these vouchers with additional free fruit and vegetables

This council **RESOLVES** to:

1) Call on the Chair of the National Food Strategy, Henry Dimbleby, to recommend in addition:

- a) for a 'right to food' to be established in law, thereby ensuring a recognisable governmental responsibility for this provision.
- b) that accessibility to the Free School Meal scheme is given equal importance as eligibility (so that digital poverty doesn't precipitate food poverty)
- c) that accessibility to the Holiday Activity and Food programme is given equal importance as eligibility (so that digital poverty doesn't preclude participation and precipitate food poverty)
- d) raising the value of the Healthy Start vouchers to £5.00.
- e) that all food for sale in the U.K. on reaching its 'best before date' is automatically donated for distribution through delivery networks such as foodbanks.
- f) that all local schemes encouraging environmentally sustainable food production, including communal allotments or appropriate foods grown in communal areas, be eligible to funding drawn from tariffs imposed upon products not meeting the standards of certification schemes covering animal welfare, environmental and climate protections as outlined in recommendation 5.

2) Ask the Lord Mayor to write to thank those local supermarkets and convenience stores actively donating food for distribution through local delivery networks such as foodbanks to Norwich residents.

3) Ask the Leader of the council to write to the relevant Secretary of State urging the National Food Strategy recommendations"

9(c) Motion: Climate and Ecological Emergency (CEE) Bill

The following amendments from Councillor Galvin had been received:

Insert **"through continuing to increase its practical action, together with partners;** at the end of resolution 1)

The mover of the motion had indicated that he was willing to accept the amendments and as no other member objected, they became part of the substantive motion.

Councillor Packer moved and Councillor Giles seconded the motion as amended.

Following debate, it was **RESOLVED**, unanimously, that:

Humans have already caused irreversible climate change, the impacts of which are being felt in the UK and around the world. Global temperatures have increased by 1 degree Celsius from pre-industrial levels. Atmospheric CO₂ levels are above 400 parts per million (ppm) and continue to rise—this far exceeds the 350 ppm deemed to be a safe level for humanity. Without more significant and sustained action, the world is set to exceed the Paris Agreement's 1.5°C limit between 2030 and 2040.

This council:

1. Notes, that the current UK target of net zero by 2050 is not satisfactory. It is too little too late. The increase in harm caused by a rise of 2°C rather than 1.5°C is significant. This is described by the Intergovernmental Panel on Climate Change's Special Report on Global Warming of 1.5°C published in October 2018. According to the IPCC, limiting heating to 1.5°C may still be possible with ambitious action from national and sub-national authorities, civil society, the private sector, and local communities. This action requires appropriate resources from central government to enable cities, like Norwich, to deliver the change needed to avoid the worst impacts of climatic change and to drive a sustainable and socially just post Covid-19 recovery.
2. Recognises once again that the evidence is clear. The costs of failing to address this crisis will far outstrip the investments required to prevent it. Investing now will bring many benefits in the form of good jobs, breathable cities and thriving communities.
3. Notes that many local authorities are playing an important role in the UK taking action to achieve net zero
4. Notes that there is a Bill before Parliament—the Climate and Ecological Emergency Bill (published as the Climate and Ecology Bill)—according to which the UK Government must develop an emergency strategy that:
 - a) requires that the UK plays its fair and proper role in reducing greenhouse gas emissions consistent with limiting global temperature increase to 1.5 degrees Celsius above pre-industrial temperatures;
 - b) ensures that all the UK's consumption emissions are accounted for;
 - c) includes emissions from aviation and shipping;
 - d) protects and restores biodiverse habitats along overseas supply chains;
 - e) restores and regenerates the UK's depleted soils, wildlife habitats and species populations to healthy and robust states, maximising their capacity to absorb CO₂ and their resistance to climate heating
 - f) builds on the findings of the parliament's climate assembly, to engage further with the UK Government to help develop the emergency strategy.

Council therefore **RESOLVES** to:

- 1) Support the Climate and Ecological Emergency (CEE) Bill through continuing to increase its practical action, together with partners;
- 2) Inform the local media of this decision;
- 3) Write to local Members of Parliament, asking them to support or thanking them for supporting the CEE Bill; and
- 4) Write to the CEE Bill Alliance, the organisers of the campaign for the Bill, expressing its support (campaign@ceebill.uk)

(As two hours had passed since the start of the meeting, the Lord Mayor asked if any of the remaining business could be taken as unopposed. The remaining motions below were all agreed as unopposed business).

9(d) Motion: Excess profits

Whilst smaller High Street non-food retail outlets were forcibly closed, and some are facing business failure, because of the COVID-19 lockdown, larger national businesses and multi-national businesses offering on-line products have thrived, reporting bumper profits.

Recent proposals from the UN and the EU are working to establish an international consensus on business taxation, to minimise profit-shifting for the purpose of avoiding corporation tax, but that these proposals are not likely to be introduced in time to have any impact on the excess online profits that some companies have made off the back of the coronavirus epidemic.

Council **RESOLVES**

- 1) To affirm its support for raising a bespoke tax on excess online profits has precedent in the UK.
- 2) Expresses its disappointment that the Chancellor has not yet introduced such a tax and believes that if we are, as the Prime Minister claims, 'all in this together', then the excessive profits of such on-line businesses should be subjected to a fair level of tax, and that the revenue raised employed to support our hollowed out public services (local government, schools and health) and the financial recovery of our high street retailers.
- 3) To ask group leaders to write to;
 - a) The Chancellor of the Exchequer, The Rt Hon Rishi Sunak MP, urging him to introduce such a tax as one means to ensure that we are 'all in this together'.
 - b) Our local MPs to seek their support for such a tax.
 - c)

9(e) Motion: Single parent's rights

In Norwich, 7.3% of households consist of a lone parent with dependent children. A third of children in single parent homes live in poverty, despite most single parents being employed. Single parents face discrimination throughout their daily lives, including in the workplace and when accessing housing. This has knock-on effects for them, their children, and society as a whole.

During the COVID-19 pandemic, many single parents were left isolated by lockdown rules which prevented them from accessing support networks and, often, the ability to interact with other adults. Single parents were more likely to have been furloughed than other adults.

The Equality Act 2010 outlaws discrimination towards certain groups who are deemed to have one of the nine protected characteristics. We believe single parents deserve similar protection.

This council **RESOLVES** to:

- 1) ask group leaders to write to the Minister for Women and Equalities asking for single parenthood to become a protected characteristic in the Equality Act; and
- 2) add a question monitoring single parenthood status to council equality and diversity monitoring forms and staff surveys

(The Lord Mayor closed the meeting.)

LORD MAYOR

Council
29 June 2021

Questions to cabinet members or chairs of committees

Question 1

Councillor Manning to ask the cabinet member for safer, stronger neighbourhoods the following question:

“Representing a ward, like most councillors, with an ever-increasing number of private renters, I am acutely aware of the need for better protections and safeguards to control this largely scandalously unregulated sector. I have watched with interest the powerful success, now made public with the conclusion of the court case, of the St Faith’s Lane trial and am very pleased with the outcome for tenants involved. Can the cabinet member for safer, stronger neighbourhoods comment on the importance of this success and how the council can build on this to further protect private renters in this city?”

Councillor Jones, the cabinet member for safer, stronger neighbourhoods’ response:

“Thank you for your question and support of the PSH officers who investigated, gathered evidence, served notices and gave evidence at the Upper Tier Tribunal appeal.

I attended the tribunal, and our evidence was professional fully justifying the council action resulting in the successful outcome. The subsequent criminal case against the landlord returned a guilty plea with resulting fines.

This case placed Norwich in the spotlight, with other local authorities watching closely the first case appealed to the Upper Tier Tribunal: this success gave LA’s the legal guidance for similar enforcement action, showing landlords cannot hide behind a company entity.

Equally, we can now confidently take further enforcement action where necessary to protect private sector housing tenants.

In addition, the current HMO licensing scheme is to be fully reviewed to improve HMO enforcement and developing a PSH citizens charter will demonstrate our commitment to supporting PSH tenants.”

Question 2

Councillor Button to ask the leader of the council the following question:

“Fuel poverty has been a persistent and growing problem in this city and the different actions and steps taken to address this over many years have been warmly welcomed by all members. The latest initiative, in Templemere Catton Grove Ward, has seen the successful installation of 80 gas central heating systems into some of the coldest homes in the city through the mobilisation of the Warm Homes Fund. Residents have received these installations for free with landlords paying a third of costs in private rented homes. This project has been a huge success for all involved and has helped to ensure the estate is suitable for habitation for many years to come. Can the leader comment on this initiative and the benefits attained?”

Councillor Waters, the leader’s response:

“Over a million pounds was invested into Templemere to install first time central heating. Alongside the 80 central heating systems, mains pipework was laid so all residents can choose to connect to the gas network. The new heating systems should reduce heating bills by almost half, making a drastic difference to people’s ability to heat their homes.

Beyond Templemere we have invested considerable resources to reduce fuel poverty and improve housing stock. Only around 30% of UK homes meet EPC band C but we have upgraded our council homes to an average of EPC band C. Other work includes Cosy City, to help residents access funding for home insulation, our renewable collective energy switching scheme, our “Warm and Well” programme and work with private landlords to improve the city’s poorest housing stock; last year alone we secured £2.5 million for private sector home improvement.”

Question 3

Councillor Huntley to ask the cabinet member for sustainable and inclusive growth the following question:

“I last visited Rayne Park earlier this year to view the development of the new Norwich Regeneration Limited properties. Returning just a couple of weeks ago I was deeply impressed by their quality, design and pleased to see new owners moving in. As we continue to develop this part of Norwich, and see NRL return to strong growth, can the cabinet for inclusive and sustainable growth, comment on progress and the new opportunities which future development can offer?

Councillor Stonard, the cabinet member for sustainable and inclusive growth's response:

“I am delighted to see the residents moving into Trinity Gardens at Rayne Park and the remainder of the development progressing so well. I too am very impressed with the revised designs and quality of development.

The development, when completed, will provide 153 new homes for the residents of Norwich, of which 49 will be for social rent, 2 for shared equity, 8 for private rent and 94 for open market sale.

Looking to the future and building upon the recent success of sales at Trinity Gardens, cabinet in March welcomed the NRL business plan, subject to independent assurance, and sought business cases for investing in two further sites, Three Score phase 3 and Ber Street.

The independent assurance report, along with an outline business case for Three Score phase 3, will be reported to cabinet next week seeking access to the finance to take this development forward.

Question 4

Councillor Oliver to ask the leader of the council the following question:

“Everyone in’ showed what is possible if we want to “end rough sleeping for good”, but gains made nationally in March last year were quickly lost, as funding was quietly withdrawn over summer and by autumn 2020 at least 2,688 people were sleeping on the streets in the United Kingdom. In Norwich, in the spirit of “doing different”, we have continued to develop and build on the success of our Pathways scheme, working in partnership with others, to provide a better response to rough sleeping. Can the leader comment on the success of this work and the future strategy to tackle this most serious of problems in our city?”

Councillor Waters, the leader’s response:

“Our focus is to get people off the street and identifying sources of rough sleeping such as prisons and other public services. We have adopted a systems approach, creating referral systems so that less people end up on the street. Unfortunately, many people we find have suffered trauma at some point in their lives. Our strategy is helping people rebuild their lives through our wraparound services and reconnecting them with society thus breaking the cycle of homelessness. Throughout the pandemic we have housed 199 rough sleepers with 176 positive outcomes.

Despite this we continue to have flow on to our streets due to the transient nature of rough sleeping. To combat this, we are investing in support to connect rough sleepers to their home areas. Our long-term vision is to provide more Housing First opportunities adding to our growing stock of homes providing lasting change for people with support.”

Question 5

Councillor Peek to ask the leader of the council the following question:

“Representing a ward near the famous Goldsmith Street I am aware of the difference which developments such as this can deliver to practically improving the environment in our city. Earlier in the month I was pleased that Norwich took the top spot as the UK’s best place to live for the most energy-efficient properties, with Cardiff, Glasgow, Liverpool and Edinburgh making up the rest of the top five. The findings were taken from this year’s Rated People Home Improvement Trends Report, where different UK cities were scored against a set of 20 ‘eco-home criteria’, ranging from how many homes have smart heating controls and energy-efficient lightbulbs to electric car charging points, smart meters and heat pumps. Can the leader comment on this success and our strategy for further delivering on the practical environmental agenda to deliver more eco-friendly homes in our fine city?”

Councillor Waters, the leader’s response:

“Addressing fuel poverty is a key action for this council. Presently our council housing stock condition outstrips the private sector with a Grade C average EPC rating. The council recently agreed to a carbon neutral housing stock by 2030.

The council has a strong record for retrofitting engagement. Examples include:

- In 2020 we secured £2.5 million to undertake private sector home improvements.
- Our collective group purchase solar scheme – Soar Together.
- Launch of the Sustainable Warmth competition last week
- plans to help more low energy efficiency, fuel poor homes. In particular EPC rating homes of E,F and G for residents with low incomes.

High environmental standards for our own development projects at Hansard Close, Rayne Park & the Goldsmith Street development. Design work on Argyle Street, Three Score phase 3 and the Mile Cross depot will draw high levels of insulation, renewable heat sources to maximise natural energy to help tackle fuel poverty.

Question 6

Councillor Giles to ask the cabinet member for sustainable and inclusive growth the following question:

“There has been ongoing coverage in the local press on the work and aspirations to develop the East Norwich area, particularly since the closure of the former Colman’s site a couple of years ago. Some misinformation about the proposals, designed to worry residents, has been disseminated in Thorpe Hamlet and Lakenham. Given the significance and importance of regeneration, new homes, new jobs, and sustainable growth, can the cabinet member for inclusive and sustainable growth explain the work that has been done to date, the decisions that have and have not been made and the development process going forward, with reference to public and stakeholder engagement?”

Councillor Stonard, the cabinet member for sustainable and inclusive growth’s response:

“Thank you for your question about engagement on the East Norwich masterplan.

Engagement is indeed a key element of the masterplan process, aiming to ensure that all relevant stakeholders including landowners, elected members, local residents, businesses, and community and amenity groups have their say in shaping the masterplan. Good progress has been made by the consultants so far, including meetings with a range of stakeholders including landowners, member workshops, and stakeholder engagement workshops. Public drop-in exhibitions are planned for late July following relaxation of covid restrictions.

No decisions have been taken on the content of the emerging masterplan yet. The purpose of this stage is to listen to the views of stakeholders and the wider community. This will then set the framework for the development of masterplan options during the summer, with a final concept masterplan developed by late summer / early autumn.”

Question 7

Councillor Bogelein to ask the cabinet member for health and wellbeing the following question:

“A Green Party motion was passed in September 2019 to address the biodiversity emergency. One of the actions in this biodiversity motion was to update the council’s biodiversity action plan, which, shockingly, was last updated in 2002. The response on the motion tracker says that this work would start in 2020 and would be brought to climate and environment emergency executive panel for discussion in 2020. So far, we have not seen any updated action plan. Could you please clarify when, after almost two decades, an updated action plan will come to members for discussion?”

Councillor Packer, the cabinet member for health and wellbeing’s response:

“Work to improve biodiversity across our city has not stood still since the last action plan. There have been major improvements for our local nature reserves and wildlife sites, significant changes in how we manage formal parks, open spaces and communal gardens, and improvement in how we interact with our community groups.

Work is underway on the new biodiversity strategy and action plan. The next step is engagement with communities and partners, given the important role they have to play. This will take place over the autumn and include members.

Royal Assent of the, much delayed, Environment Bill, expected this autumn, is also a key milestone. It proposes significant changes around the relationship between local and national government, with potentially a greater responsibility sitting with councils.

Nonetheless, our ambition is to have this strategy and action plan in place during this financial year.”

Supplementary question:

Councillor Bogelein asked if the action plan would cover all services, including those provided by Norwich City Services Ltd to the council and other clients, and whether this would be reflected in the NCSL Business Plan.

Councillor Packer said that he believed this would be the case but would confirm this.

Question 8

Councillor Galvin to ask the cabinet member for resources the following question:

“Cabinet is the decision-making body of the council. 224 pages of papers for its meeting on 9 June contained important items, including its *Equality Diversity and Inclusion Policy*, *Customer Experience and Digital Strategy*, *Budget Monitoring Provisional Outturn* and *5 Year Air Quality Action Plan for Norwich*. A standing item is *Public Questions/Petitions* - 'to receive public questions/petitions from the public **by 10am** on Tuesday 1 June 2021 in line with the council's constitution.' However, the cabinet papers were not published until the **afternoon** of 1 June. I was surprised the Leader of the Council did not use his discretion to allow questions received from members of the public. It is not possible to send in questions on reports before they have been published. What will the council do to ensure members of the public can ask questions about council reports at the meeting at which the report is tabled?”

Councillor Kendrick, the cabinet member for resources' response:

“A question may only be asked if it has been received by Democratic Services no later than 10am five clear working days before the meeting. The clear days does not include the day the meeting takes place. There is a statutory requirement for a forward plan for key decisions which Norwich maintain, and this is done to give early notice of what is to be discussed at any meeting which give details of items on the cabinet agenda. Part 4, points 23 and 28 of the constitution (Access to information rules) note that the 5 clear day period also applies to publication of agendas and notice of meetings – this is in line with the statutory position for the publication of agendas. I appreciate that this may have caused some concern and individuals might feel disappointed not being able to read the report until after the deadline had passed.”

Supplementary question:

Councillor Galvin asked if the cabinet member agreed that it was right that members of the public could not see the agenda papers before deciding if they would like to ask a question.

Councillor Kendrick reminded members that all parties had been represented on the constitution working party which had put thorough those changes to the constitution.

Question 9

Councillor Youssef to ask the cabinet member for health and wellbeing the following question:

"In September 2019, this council agreed, as part of a motion to urgently tackle the biodiversity emergency, to continue '*to work with the Pesticide Action Network, to lead Norwich to becoming pesticide free*'. In March 2021, the council agreed to '*continuing work with the Pesticide Action Network (PAN) to lead to an end in use of pesticides in Norwich*'. Could the cabinet member give an update on the work that the council has done with the Pesticide Action Network over the last two years?"

Councillor Packer, the cabinet member for health and wellbeing's response:

"I am sure that all councillors will appreciate that the impact of Covid 19 has restricted the work that Council officers and NCSL / NNE staff have been able to undertake. This, inevitably, restricted the time available to identify alternatives to pesticide use in maintaining the Council's Parks and Open Spaces. Furthermore, there had always been the intention and opportunity to have greater control of the contracts once they had transferred to the newly created NCSL.

Despite challenges, we have made progress. An audit of existing pesticides has been completed and we have been preparing for a trial of non-pesticide methods of weed control next spring. It is intended to be completed with a final report presented next summer.

Working with Norwich City Council and the Pesticides Action Network on the aim to remove all pesticides is included as a key deliverable in the NCSL business plan for 21/24."

Supplementary question:

Councillor Youssef asked when the findings of the pesticide audit would be presented.

Councillor Packer said that he would check this and let Councillor Youssef know.

Question 10

Councillor Schmierer to ask the leader of the council the following question:

“I was very concerned to read in election literature from the Labour party, which forms the administration on Norwich City Council, that only Labour councillors have the ear of the administration. Can you please reassure me that the administration respects the outcomes of elections and equally listens to concerns of residents which are raised by opposition councillors who represent a significant proportion of Norwich residents?”

Councillor Waters, the leader’s response:

“Councillor Schmierer, as an experienced councillor and former Lord Mayor, I would have assumed a familiarity with the accountability arrangements that operate within the council.

There are of course the realities and different roles that come with being in administration or being in opposition. Labour has been elected to deliver its manifesto. We have always adopted an open and inclusive relationship with all political parties represented on the council. By way of illustration, this evening’s council agenda demonstrates this both in the opportunities provided to ask questions, comment on reports and the work done cross party, prior to council, to achieve a consensus on the motions for debate this evening.”

Supplementary question:

Councillor Schmierer said that the national news had reported on ‘pork barrel politics’ which funnelled government spend by ruling parties into particular political considerations at the expense of broader public interest and wanted to give the leader of the council a chance to distance the council from those politics.

Councillor Waters said that Councillor Schmierer had answered his own supplementary question by saying that he would not compare the administration to the Conservative Government.

Question 11

Councillor Grahame to ask the cabinet member for resources the following question:

“I was very disappointed to see in the CITIZEN magazine a full-page advertisement of city council car parks, without any indication of how people could travel into the city in a more sustainable way. This illustrates the big elephant in the room: the council wants to be sustainable, but big parts of its income come from parking charges. Can the cabinet member please update me about how the council is planning to reduce its unsustainable reliance on car parking fees?”

Councillor Kendrick, the cabinet member for resources' response:

“The Council’s Financial Plan forecasts that £11.8m of gross savings will need to be found over the four year period from 2022/23. This quantum of savings represents 21% of the 2021/22 proposed gross expenditure budget. The car parking service makes a considerable direct contribution to the Council’s current revenue budget, and this will be required to meet the significant financial challenges that the Council faces due to Tory austerity.

It also makes a significant indirect contribution through supporting the City’s economy by providing an appropriate level of parking to support economic vitality, ensuring that parking is inclusive for all users, delivering efficient parking and traffic management to support the local economy, and providing access to key services and facilities.

The Council is currently reviewing its asset management strategy and the future approach to car parking provision will be influenced by this and forthcoming review of the Transport for Norwich Strategy.”

Supplementary question:

Councillor Grahame asked how the council planned to navigate the conflict between a reliance on car parking income and clean air aspirations.

Councillor Kendrick said that the council would have to make massive budget cuts if there was no car parking income and some people needed to use cars to come into Norwich. Visitors were encouraged to use the council’s car parks which played an important role in protecting vital services.

Question 12

Councillor Carlo to ask the cabinet member for sustainable and inclusive growth the following question:

“We hear that the council and Weston Homes are considering their options for Anglia Square. An indication of the council’s thinking was a new policy in the Regulation 19 Greater Norwich Local Plan, proposed, regrettably, without public discussion, which does not bode well for the need to achieve wide support. The main change is lower housing numbers (from 1250 to 800 units) but new student housing has been added. This still represents a substantial amount of housing for a 4.79 ha site and makes high-rise development in the oldest part of Norwich likely. There was no mention of green space despite the city becoming hotter due to climate change and extensive building and paving over. When will the city council open up the debate on Anglia Square and involve ward councillors and stakeholders in crafting a sensitive, imaginative and forward-looking, climate-aware planning brief for this important site?”

Councillor Stonard, the cabinet member for sustainable and inclusive growth’s response:

“Anglia Square has been a priority for comprehensive regeneration for many years now. The need for regeneration was first highlighted in the Local Plan of 2004, Northern City Centre Area Action Plan, and in advance of considering the last application for the site a planning guidance note was produced. All these documents involved extensive programmes of public engagement.

The timing of the secretary of state’s decision to go against his own inspector’s recommendation and refuse the proposed redevelopment of the site last November came at a time that wasn’t ideal for the preparation of the local plan. Nevertheless, it was possible to consult on the emerging policy in the GNLP earlier this year.

The council continues to work closely with all concerned to identify the appropriate next steps in development of the site and I’m confident there will be extensive engagement with all interested parties.”

Supplementary question:

Councillor Carlo asked when and how the council would engage with stakeholders on the future on Anglia Square and whether green space would be included within the plans.

Councillor Stonard said that it was important to remember that the council was in the very early stages of considering the future of Anglia Square. The landowners and developers were reconsidering their proposals and engaging with organisations such as Historic England to try and find a mutually acceptable solution. When proposals were put forward, there would be full consultation and engagement. Green spaces would be included in the development.

Question 13

Councillor Osborn to ask the cabinet member for resources the following question:

“At the budget scrutiny committee meeting, Green councillors asked whether Community Municipal Investment Bonds (CMIBs) could be included as a potential funding source for capital projects with social or environmental benefits. At the time, the council said that no projects were proposed that would be appropriate for such funding but that it remained an option. Does the cabinet member agree that the council should be actively looking for investment opportunities that could be funded through CMIBs to provide social and environmental benefits while generating a local financial return, for example investing in local solar power?

Councillor Kendrick, the cabinet member for resources’ response:

“Community Municipal Investment Bonds (CMIBs) are a potential funding source for future capital projects. However, depending on the nature of the investment, other forms of finance might be more suitable. Consideration should be given to all viable options.

The council actively looks for investments and has investigated community energy, grid flexibility and energy saving in partnerships. These proposals require significant work to be viable and regrettably many don’t make it over the line for various reasons including a changing regulatory landscape.

The council has developed an expression of interest for funding from the Community Renewal Fund. This proposal intends to find new commercial solutions for the emerging hydrogen economy and localised energy sectors. This could result in funding from variety of sources.

I would welcome any costed commercial business cases from councillors which allow for a return on investment whilst also providing social and environmental benefits with minimal risk.”

Supplementary question:

Councillor Osborn said that although he was pleased to see that all viable options were being considered, he was disappointed that not much progress had been made so far compared to other councils such as West Berkshire and West Suffolk.

Councillor Kendrick said that the financial situation of the council could not be compared with others. He would welcome fully costed commercial business cases which could provide a return on investment whilst providing services at no risk.

Question 14

Councillor Haynes to ask the cabinet member for resources the following question:

“The financial outturn for the last financial year shows an underspend of £396,000 for the estates aesthetics programme. This underspend has been explained by Covid restrictions. This programme is vital and a number of estates could really benefit from crucial investment in aesthetics. We know from research commissioned by the council and research on the broken window theory that the aesthetics of an area have an important link to feelings of safety and reductions in anti-social behaviour. It is one of the ways in which the council can make a crucial contribution to improving residents' lives. I understand that a request has been made to carry this underspend over to the next financial year. Can you please commit to carrying over the full amount so the council can ensure that as many estates as possible can be included in this programme going forward?”

Councillor Kendrick, the cabinet member for resources' response:

“I completely agree that the estates aesthetics programme is crucial to improving our estates and neighbourhoods which is why we have increased the budget over the past few years. The current projects total £608,684.52 from a of budget of £1,000,000 and we are assessing further bids. For now, this this area of work does not require any financial carry forward. Should there be a need for additional finance to deliver any additional works identified throughout the year, and as circumstances change then this will be subject to separate business cases requests throughout the financial year.”

Supplementary question:

Councillor Haynes said that residents were being told that finances were the reason that the issues were not being sorted and asked why therefore this area was not in need of financial carry forward.

Councillor Kendrick said that the last financial year was different year due to covid and the council was not able to do as many works as its would have liked. The money was not being lost as it would be invested in the future with the council continuing to prioritise investments and striving to provide excellent services to tenants.

Question 15

Councillor Lubbock to ask the cabinet member for health and wellbeing the following question:

“I would like to know what progress the administration has made with their plans to charge for parking in Eaton and Waterloo Parks.

Details such as the cost of installing the equipment and estimating the potential net income and consulting with local residents?”

Councillor Packer, the cabinet member for health and wellbeing’s response:

“The council has identified the key milestones that need to be completed before we can implement charges for parking in our parks. These milestones include conducting Stakeholder Consultation, options appraisal on payment methods, and finalising projected income and expenditure, including start up costs. Much of this work will be carried out as part of an integrated approach to the introduction of cashless parking at our other off street and on street parking sites.

Resources for this work are being allocated, and this work will be completed over the summer for a decision by cabinet in early autumn. It is anticipated that full implementation will be achieved by the end of this calendar year ”

Supplementary question:

Councillor Lubbock said that the slow progress on the implementation of charges suited local residents as there were very unpopular. If the consultation revealed similar negative responses, would cabinet change its mind.

Councillor Packer said that if Councillor Lubbock could identify where the money could be found instead, he would be very happy to discuss this.

Question 16

Councillor Wright to ask the leader of the council the following question:

“The council’s recent announcement about the closure of the Tourist Information Centre has caused much local interest and disappointment.

Whilst the council clearly has to look for savings, and the over £100k saved from this closure is not insignificant, a city the size of Norwich should be able to maintain an in-person tourist centre.

An alternative might be the provision of a market stall to be used by VisitNorwich and resourced by the excellent City Hosts.

Has the cabinet member given any consideration to alternatives such as the one suggested?”

Councillor Waters, the leader’s response:

“Fewer tourists are visiting Tourist Information Centres, even before Covid19. The national trend is for customers to use multiple channels giving increased visibility and flexibility to learn about their destination.

The City Hosts are organised by the Norwich BID and they provide an excellent source of accessible information with a face-to-face service. There are many other alternatives for visitors before and during their visit; the council responds to phone and email enquiries and there is a ‘Live Chat’ function on the VisitNorwich website, which we support via funding. We support marketing, such as the current ‘Summer is on’ campaign and work in partnership with organisations to make improvements, such as with the new Wayfinding totems across the city centre.

I feel confident of a strong and safe tourist season ahead, and that visitors will be able to access the information they need to make the best of their stay.”



Committee Name: Council

Committee Date: 20/07/2021

Report Title: Adjustments to Capital Programme 2021-22

Portfolio:	Councillor Kendrick, corporate resources
Report from:	Executive director of corporate and commercial services
Wards:	All Wards
OPEN PUBLIC ITEM	

Purpose

To seek approval for adjustments to the capital programme to provide loan finance and share capital to Norwich Regeneration Ltd and to provide the necessary funding to proceed with the development of the Kings Arms Public House site at 100 Mile Cross Road.

Recommendation:

It is recommended to approve the following adjustments to the capital programme:

- (1) An increase to the General Fund capital programme of £2m in 2021/22 and £2m in 2022/23 to provide loan finance and share capital to Norwich Regeneration Ltd.
- (2) An increase to the HRA capital programme of £0.152m in 2022/23 and £0.006m in 2023/24 to provide the necessary funding to proceed with the development of the Kings Arms Public House site at 100 Mile Cross Road.

Policy Framework

The Council has three corporate priorities, which are:

- People living well
- Great neighbourhoods, housing and environment
- Inclusive economy

This report meets the Great neighbourhoods, housing and environment corporate priority

This report helps to meet the Build and maintain a range of good quality affordable and social housing adopted policy of the council

Report Details

1. At its meeting of 7 July 2021, cabinet considered reports regarding NRL assurance and consideration of the Threescore phase 3 outline business case and the award of a contract for the development of former Kings Arms Public House site at 100 Mile Cross Road.
2. With regard to the report “NRL assurance and consideration of the Threescore phase 3 outline business case”, cabinet resolved:
 - (1) to recommend to council that provision for the necessary loan finance and share capital (currently estimated at up to £4.0m) be approved for inclusion in the capital programme £2m (2021/22) and £2m (2022/23); and,
 - (2) subject to council approval of (1) above to:
 - (a) delegate authority to the executive director of development and city services in consultation with the Portfolio Holder for Resources to dispose of land to NRL at the value set out in the exempt appendix (see para 6 of exempt appendix 3) to deliver the private housing element of the scheme;
 - (b) delegate authority to the executive director of development and city services in consultation with the portfolio holder for resources to appropriate land to the HRA to deliver the social housing element of the scheme (as set out in para 10 and 11 of exempt appendix 3); and
 - (c) delegate authority to the executive director of corporate and commercial services in consultation with the portfolio holder for resources to enter into a new loan facility agreement with NRL to fund approved shareholder investment.
3. With regard to the report “Award of a contract for the development of former Kings Arms Public House site at 100 Mile Cross Road”, cabinet resolved to:
 - (1) agree to award the contract (details contained in the exempt appendix to the cabinet report “Award of a contract for the development of former King’s Arms Public House site at 100 Mile Cross Road”)
 - (2) approve an increase in the overall project budget to cover an increase in project costs.
 - (3) recommend to council, an increase to the HRA capital programme of £0.158m (£0.152m 2022-23 and £0.006m 2023-24) to be funded from

£0.063m of Retained Right to Buy Receipts and £0.095m existing HRA balances.

4. Following the cabinet decision, the contract has now been awarded subject to approval of recommendation (2) above and no challenge being received during the standstill period. Assuming budget is approved and no challenge received details of the successful tenderer will be released shortly following council.

Consultation

5. Previous consultation took place as part of the planning and CPO (Compulsory Purchase Order) phases of the King's Arms site project. Consultation was not relevant to procurement of a construction contractor. Extensive consultation has also taken place in relation to the proposed development at Three Score, the application for reserved matters planning consent is expected to be submitted imminently.

Implications

Financial and Resources

Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2019-22 and Budget.

6. The financial implications of the council approving the recommendations are an increase to the capital programme of £2m in 2021/22, £2.152m in 2022/23 and £0.006m in 2023/24.
7. The proposed arrangements with Norwich Regeneration Ltd will comprise equity shares and loans to maintain a gearing ratio of not more than 75% debt. The loan interest rate will be 4.5% over base, currently 4.6%.

Legal

8. Full details of all legal implications are included in the reports to cabinet (Cabinet, 7 July 2021) "NRL assurance and consideration of the Three Score Phase 2 outline business case" and "Award of a contract for the development of former King's Arms Public House site at 100 Mile Cross Road" and the associated exempt appendix.

Statutory Considerations

Consideration:	Details of any implications and proposed measures to address:
Equality and Diversity	Neutral impact
Health, Social and Economic Impact	Positive impact – provision of high-quality new homes and affordable dwellings, one of which is a bungalow with a specification suitable for tenants with limited mobility
Crime and Disorder	Positive - Development of the former Kings Arms pub site removes a problem site and a focus of anti-social behaviour and fly tipping and Three Score Phase 3 scheme has been designed with a view to maximise surveillance of open spaces
Children and Adults Safeguarding	Neutral impact
Environmental Impact	Positive – delivery of 5 affordable homes at King's Arms site designed to high environmental (fabric first) standards, with no requirement for fossil fuel heating in a sustainable location close to cycle and bus links. Environmental impact of Three Score site detailed within the cabinet report but likely to be considerably less than most other new homes currently being built in Norwich

Risk Management

9. Full details of risk management is covered in the reports to cabinet (Cabinet, 7 July 2021), "NRL assurance and consideration of the Three Score Phase 2 outline business case" and "Award of a contract for the development of former King's Arms Public House site at 100 Mile Cross Road" and the associated exempt appendix

Other Options Considered

10. Full details of all options considered are included in the reports to cabinet (Cabinet, 7 July 2021), "NRL assurance and consideration of the Three Score Phase 2 outline business case" and "Award of a contract for the development of former King's Arms Public House site at 100 Mile Cross Road" and the associated exempt appendix.

Reasons for the decision/recommendation

11. To provide the financial budget to take forward the development of two key sites within the city.

Tracking Information

Governance Check	Date Considered
Relevant Finance Officer	Hannah Simpson 09/07/21
Chief Finance Officer (or Deputy)	Hannah Simpson 09/07/21
Monitoring Officer (or Deputy)	Katrina Hulatt 09/07/21
Relevant Executive Director	Graham Nelson 09/07/21

Background papers:

[Cabinet Reports of 7 July 2021:](#)

NRL assurance and consideration of the Three Score Phase 2 outline business case

Award of a contract for the development of former King's Arms Public House site at 100 Mile Cross Road

Appendices:

None

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Committee Name: Council

Committee Date: 20/07/2021

Report Title: Greater Norwich Local Plan (GNLP) – Submission to the Secretary of State for Independent Examination

Portfolio:	Sustainable and inclusive growth
Report from:	Executive director of development and city services
Wards:	All Wards
OPEN PUBLIC ITEM	

Purpose

To agree to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination.

Recommendations:

It is recommended that Council:

- (1) agrees that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination, subject to an agreement in principle being reached with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations;
- (2) agrees to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;

and,

- (3) delegates authority to the Executive Director for development and city services, in consultation with the cabinet portfolio holder for sustainable and inclusive growth to:
 - (a) agree minor modifications to the GNLP prior to its submission.

and,

- (b) negotiate any main modifications necessary to make the GNLP sound as part of the Independent Examination.

Policy Framework

The Council has three corporate priorities, which are:

- People living well
- Great neighbourhoods, housing and environment
- Inclusive economy

This report meets the corporate priorities great neighbourhoods, housing environment, and inclusive economy.

This report addresses the following strategic actions in the Corporate Plan:

- a clean and sustainable city with a good local environment that people value; ensure our services mitigate against any adverse effects of climate change and are efficient to reduce carbon emissions;
- build and maintain a range of affordable and social housing;
- improve the quality and safety of private sector housing;
- continue sensitive regeneration of the city that retains its unique character and meets local needs;
- mobilise activity and investment that promotes a growing, diverse, innovative and resilient economy;
- address barriers to employability and enhance social mobility.

This report helps to update the local plan for Greater Norwich. The Greater Norwich Local Plan (GNLP) once adopted will replace the Joint Core Strategy for Broadland, Norwich and South Norfolk which currently forms a key part of the local plan for Norwich.

This report helps to meet the following objectives of the COVID-19 Recovery Plan:

- Business and local economy,
- Housing, regeneration and development
- Climate change and the green economy

Report Details

Summary

1. On 20 January 2021, Norwich City Council's [Cabinet](#) approved the publication of the pre-submission version of the Greater Norwich Local Plan (GNLP) under Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012. The publication of the GNLP took place between 1 February and 22 March 2021.
2. The GNLP team have reviewed and assessed the representations submitted in response to the publication of the GNLP. With the exception of matters specifically addressed by the recommendations of this report, and that of the report to Cabinet on 7 July, noted below, it is concluded that the representations received have identified no significant issues, in principle, that cannot be addressed or are such a risk to the GNLP that it should not be submitted.
3. At its meeting on 7 July 2021, [Cabinet](#) agreed to recommend to Council that it agrees that the Greater Norwich Local Plan (GNLP) is sound and to submit the Plan to the Secretary of State for independent examination subject to an agreement in principle being reached with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations. It also agreed to recommend to Council that it agrees to
 - Request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant;and,
 - Delegate authority to the executive director for development and city services in consultation with the portfolio holder for sustainable and inclusive growth to:
 - agree minor modifications to the GNLP prior to its submission, and
 - negotiate any main modifications necessary to make the GNLP sound as part of the Independent Examination.
4. Cabinet also agreed to commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans.
5. On this basis, it is therefore proposed that Council approves submission of the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination, subject to the caveats and delegations specified above.

Background

6. Norwich City Council, Broadland District Council, and South Norfolk Council are working together with Norfolk County Council to prepare the Greater Norwich Local Plan (GNLP). The GNLP builds on the long-established joint working arrangements for Greater Norwich, which delivered the Joint Core Strategy (JCS). The JCS plans for the housing and jobs needs of the area to 2026. The GNLP will ensure that these needs continue to be met to 2038. The GNLP includes strategic planning policies and allocates individual sites for development.
7. When adopted the GNLP will become part of the Development Plan for Greater Norwich, and will replace the current Joint Core Strategy and the Norwich Site Allocations and Site Specific Policies Plan. The Norwich Development Management Policies Plan will not be replaced.
8. A joint team of officers from Broadland, Norwich, South Norfolk and Norfolk County Council has prepared the GNLP. The Greater Norwich Development Partnership Board (GNDP) exercises political leadership for the planning activities carried out jointly by the Greater Norwich Local Planning Authorities. The board is made up of three members each from Norwich City Council, Broadland District Council, and South Norfolk Council and a member from the Broads Authority. The group is supported in its role by Director level representation from each Local Authority.
9. On 20 January 2021 Norwich City Council's Cabinet agreed to publish the pre-submission version of the Greater Norwich Local Plan (GNLP) under Regulation 19 of the Town and County Planning (Local Planning) (England) Regulations 2012. The publication of the GNLP took place between 1 February and 22 March 2021.
10. The publication of the GNLP allowed stakeholders to make representations in respect of whether the GNLP was: 1) legally and procedurally compliant; 2) Sound¹; and 3) in compliance with the Duty to Cooperate. Regulation 19 representations are sent to the independent inspector to be considered as part of the independent examination.
11. A copy of the report of the GNLP Manager to the GNDP meeting of the 24 June 2021 is included as Appendix A. Its recommendations were agreed at the GNDP meeting on that date. The GNDP report sets out the main issues raised in response to the publication of the GNLP and provides a link to the Statement of Consultation in paragraph 9; this includes summaries of all representations with officer responses, including minor modifications. With the exception of matters set out below, for the reasons specified in the GNDP report it is concluded that representations have identified no significant issues, in principle, that

¹ Soundness is defined in paragraph 35 of the NPPF and requires a Local Plan to be positively prepared, justified, effective and consistent with national policy

cannot be addressed or are such as risk to the GNLP that it should not be submitted.

12. The exceptional matters relate to the agreement of the necessary mitigation under the Habitat Regulations and demonstrating that the plan will meet the accommodation needs of Gypsies and Travellers. The specific recommendations of this report seek to address these exceptional matters.

Current position/findings

13. The GNLP team have reviewed and assessed the representations submitted in response to the publication of the GNLP. Included as Appendix A is the report of the GNLP Manager to the GNDP meeting on 24 June 2021. This report sets out the main issues raised in response to the publication of the GNLP. Officer responses to the most significant representations are set out in Table 2 of the report. For the reasons set out within the report, and with the exception of matters set out below, it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such as risk to the GNLP that it should not be submitted.
14. The exceptional matters relate to the agreement of the necessary mitigation under the Habitat Regulations and demonstrating that the plan will meet the accommodation needs of Gypsies and Travellers. The specific recommendations of this report seek to address these exceptional matters.
15. When completed the GNLP will become part of the Development Plan, and will replace the current Joint Core Strategy and Norwich Site Allocations Plan. In doing so it will ensure that the Strategic Policies remain up-to-date and that the housing and jobs needs of the area continue to be met to 2038.
16. In respect of managing development through the determination of planning applications, to the extent that the adopted development plan policies are material to an application for planning permission the decision to grant or refuse permission must be taken in accordance with the development plan unless there are material considerations that indicate otherwise.
17. Whilst policies of the development plan do not become “out-of-date” simply through the passage of time, it is important that plans are kept up-to-date in order to ensure that the policies that they contain carry full weight in the determination of planning applications.
18. Moreover, in its Planning for the Future document published in March 2020, government also set out its intention to set a deadline of December 2023 for all local authorities to have an up-to-date local plan, indicating that government will prepare to intervene where local authorities fail to do so.

19. It is therefore important that the Council makes timely progress on the production of the GNLP.

Proposed action

20. In accordance with the recommendations, it is proposed that Council agrees to submit the Greater Norwich Local Plan (GNLP) to the Secretary of State for independent examination, agrees to request that the inspector makes any main modifications necessary to make the plan sound and legally compliant, and delegates authority to the executive director for development and city services in consultation with the portfolio holder for sustainable and inclusive growth to agree minor modifications to the GNLP prior to its submission, and to negotiate any main modifications necessary to make the GNLP sound as part of the independent examination.

Consultation

21. The GNLP has undergone several stages of statutory consultation since its commencement in 2016, and reports have been provided to both Sustainable Development Panel and Cabinet throughout that period. The relevant portfolio holders have been briefed throughout the process, including the council's members who sit on the GNLP, Cllr Waters and Cllr Stonard (and until recently Cllr Maguire). As noted above the most recent period of consultation was the Regulation 19 pre-submission consultation in February – March 2021. The responses to this consultation from the public and stakeholders are set out in within a link in paragraph 9 of Appendix A.
22. In addition, [Sustainable Development Panel](#) met on 22 June to discuss the Submission GNLP. Members' comments included noting the need for clarification on the timescales for further work on the identification of additional Gypsy and Traveller sites, and the need for further clarification on Environment Agency concerns about water resources. The cumulative impact of extensive development around Norwich on protected species was also noted and interest was expressed in the outcome of the discussions currently taking place with Natural England on the mitigation necessary to protect sites protected under the Habitats Regulations.

Implications

Financial and Resources

23. Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2019-22 and Budget.
24. The GNLP is produced under an agreed budget with contributions from the three councils. Existing staff resources from each of the three authorities are also utilised to support the production of the plan. There

are no direct financial implications arising directly from this report. The council's contribution towards the cost of producing the plan is expected to be met from existing budgets. Delays in the progress of the plan are likely to result in further costs being borne by each of the three authorities.

Legal

25. The matters of whether the plan is legally and procedurally compliant, and whether the Council's obligations under the Duty to Co-operate is a key test of the independent examination. The publication of the plan allowed for representation to be submitted in regard to the Plan's compliance with these tests. For the reasons set out in section 3, and with the exception of the outstanding matter related to compliance with the Habitat Regulations, it is not considered that any representations made give rise to concern that the plan has not met its legal obligations.
26. If adopted following a successful independent examination, an interested party has 6 weeks to apply for judicial review on the basis that the Plan, or its production, is unlawful. The pre-submission publication of the plan and its subsequent independent examination is proportionate mitigation for this risk.
27. With regards to the management of development, when adopted the GNLP will become part of the Development Plan for the area. In accordance with section 70(2) of the Town and County Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004, to the extent that development plan policies are material to an application for planning permission the decision must be taken in accordance with the development plan unless there are material considerations that indicate otherwise. Paragraphs 13-15 above set out the implications for decision making of maintaining an up-to-date Development Plan.
28. It should be noted that in agreeing to submit the plan the Council will be increasing the weight that may be attached to the emerging policies as material planning considerations in the determination of planning applications in the area covered by the plan.
29. Legal advice has been sought on various matters relating to plan development during its preparation, which has been reported to the city council's GNDP members as appropriate, and has helped inform the development of the plan.

Statutory Considerations

Consideration:	Details of any implications and proposed measures to address:
Equality and Diversity	The GNLP has been subject to Equalities Impact Assessment. This is available in the link to evidence base documents under the

Consideration:	Details of any implications and proposed measures to address:
	Background Documents section of this report. In summary, although it is considered that (other than the absence of allocated Gypsies & Travellers' sites) the GNLP is considered to have little impact on the equality of protected groups, there may be opportunities to enhance the life opportunities of some protected groups at planning application stage. The GNLP offers a range of ways to address socio-economic inequality.
Health, Social and Economic Impact	<p>The plan supports healthy communities and health and active lifestyles by encourage green infrastructure and improving connectivity. It also encourages new communities to be well integrated with existing communities and to be attractive places to live. The plan also seeks to ensure that there is good access to services including health car and leisure facilities, and also seeks to deliver high quality new homes.</p> <p>In terms of economic impact the GNLP promotes economic development and seeks to generate the right levels of growth in the right places in order to support the local economy, including by stimulating investment, new infrastructure, and environmental improvements. The plan proposes that the city centre will continue to play a significant role as the economic dynamo of Greater Norwich, by supporting provision of retail and leisure facilities and a range of cultural and tourism attactions and new jobs needed to support housing growth across the plan area.</p>
Crime and Disorder	Policy 2 of the GNLP requires development proposals to 'create inclusive, resilient and safe communities'.
Children and Adults Safeguarding	N/a
Environmental Impact	The plan promotes delivery of transport infrastructure to support existing and new communities and supports modal shift and greater connectivity. Its policies protect and enhance the natural and built environment. It aims to significantly reduce emissions to ensure that Greater Norwich is adapted to climate change and supports and promotes clean

Consideration:	Details of any implications and proposed measures to address:
	<p>growth and progress towards a post-carbon economy.</p> <p>The impact of the plan's proposals on sustainability and other environmental issues has been assessed through the GNLP Sustainability Appraisal (Incorporating Strategic Environmental Assessment) and Habitat Regulations Assessment evidence documents. These reports are available in the link to evidence base documents in the Background Documents section below. This evidence is considered to be robust as noted in the GNDP report at Appendix A. Discussions on the evidence base and how it has assisted in forming policy will be an important part of the examination.</p>

Risk Management

Risk	Consequence	Controls Required
The GNLP has been prepared under an accelerated timetable. As such it was not possible to carry out the Regulation 18D consultation that was agreed by the GNDP board on 10 th July 2020 and subsequently agreed by councils' through updates to their Local Development Schemes (LDS).	Some representations have raised concerns about the lack of a Reg 19D consultation. A number of mitigation measures have been put in place through the accelerated programme to minimise the additional risk posed by removing this stage of consultation.	<p>Mitigation measures include agreement that a streamlined decision making process would be required involving some delegation of authority, eg for the content of minor modifications for issues such as updates of text of plan for clarity.</p> <p>In relation to the Regulation 18D consultation which did not take place, the GNLP team has had confirmation that this will not affect the soundness of the plan.</p>

Other Options Considered

30. Council may defer the submission of the GNLP to seek further clarifications prior to its submission, seek further amendments to the plan if it

considers the plan is currently unsound or no longer represents an appropriate strategy or it may resolve not to submit the GNLP for independent examination.

31. Any of the above options would cause a delay to the progress of the plan. The length of such a delay would depend on the reasons for the decision taken.
32. Any amendment to the plan that is proposed would need to be agreed independently by each of the three Councils and, depending on their significance and extent, may require further consultation on the plan or for the pre-submission publication be repeated. Such a decision would therefore likely lead to significant delays to the plan.

Reasons for the decision/recommendation

33. For the reasons set out above under section 'Current position/findings' (paragraphs 11 -17), it is concluded that representations have identified no significant issues, in principle, that cannot be addressed or are such a risk to the GNLP that it should not be submitted.
34. In addition, the timely progress of the GNLP is important in order to ensure that the Council's Development Plan remains effective and that the policies of the Development Plan continue to have full weight in the determination of planning application.

Tracking Information

Governance Check	Date Considered
Chief Finance Officer (or Deputy)	Hannah Simpson 09/07/21
Monitoring Officer (or Deputy)	Kat Hulatt 09/07/2021
Relevant Executive Director	Graham Nelson 9/07/2021

Background papers:

Greater Norwich Local Plan, including changes required to the Policies map on adoption of the GNLP (shown in the settlement maps in the Sites plan) - [Downloadable Documents and Forms | GNLP](#)

Sustainability Appraisal, Statement of Consultation and other supporting documents - [Evidence Base | GNLP](#)

Please note that the summary of representations made pursuant to regulation 20 i.e. duly made representations made in response to the pre-submission publication of the GNLP, are summarised in the GNLP report included as appendix A of this report.

Copies of all representations made under regulation 20 will be submitted to the Secretary of State.

Appendices:

Appendix A: Report to Greater Norwich Development Partnership (GNDP) 24 June 2021

Contact Officer:

Name: Judith Davison

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Greater Norwich Development Partnership (GNDP)	
Report title	Submission of the Greater Norwich Local Plan (GNLP)
Date	24th June 2021
<p><u>Recommendation</u></p> <p>The Board recommends member councils to:</p> <ol style="list-style-type: none"> 1. Agree that the Greater Norwich Local Plan is sound and to submit the plan to the Secretary of State for independent examination subject to an agreement in principle being reached with Natural England, in the form of a signed statement of common ground, in relation to the mitigation necessary to protect sites protected under the Habitat Regulations; 2. Commit to proactively identify and bring forward sufficient Gypsy and Traveller sites to meet identified needs in accordance with the criteria-based policies of the current and emerging Development Plans. 3. Agree to request that the appointed independent inspector make any Main Modifications necessary to make the plan sound and legally compliant; <p>and,</p> <ol style="list-style-type: none"> 4. Delegate authority within the councils to: <ol style="list-style-type: none"> a. agree minor modifications to the GNLP prior to its submission <p>and,</p> <ol style="list-style-type: none"> b. negotiate any main modifications necessary to make the GNLP sound as part of the Independent Examination. 	

Section 1 - The purpose of the report

1. The Regulation 19 stage of local plan-making, which for the GNLP took place in early 2021, provides the opportunity to make representations on the legal compliance and soundness of a draft plan. This enables:
 - a. Recommendations to be made to members about whether a plan can be submitted, or alternatively further consultation or a repeat of the Regulation 19 stage is required to enable significant changes to be made to the plan;
 - b. After submission, an Inspector to decide on whether the plan can proceed to examination and, if so, what issues that examination should cover.
2. This report sets out the main issues raised through the Regulation 19 stage of plan-making. It concludes that the representations have identified no significant issues, in principle, that cannot be addressed or are such a risk to the GNLP that it should not be submitted in the near future. The recommendation provides the caveat that submission of the plan is subject to progress being made on key issues relating to protected habitats and Gypsy and Traveller sites.
3. The recommendation also covers delegated authority at the three councils, which will need to be co-ordinated, for the sign-off of minor modifications covering issues such as corrections, updated information and clarification of supporting text stemming from representations prior to submission of the plan. Delegated authority is further recommended to negotiate main modifications during the examination, which are likely to be related to policy content. Both of these measures are the standard approach and are required for the examination to run effectively.
4. Subject to approval, the GNLP report will be considered by the councils in July to decide whether to submit the plan for examination on July 30th. If the plan is submitted at that date, examination is timetabled for November/December 2021 (subject to the Inspector) and adoption for September 2022.

Section 2 – Context

Challenges

5. The GNLP has addressed a number of challenges:

The changing context for plan-making - Since work began on the GNLP in 2016, through the three stages of consultation between 2018 and 2020, and most particularly over the last year, there has been a rapidly changing context for plan-making. In August 2020 the “Planning for the Future” white paper was published by government. It points towards a potentially radical overhaul of the planning system as a whole, including plan-making. Significantly for the GNLP, it highlighted the need for local plans to play their part in addressing the housing crisis nationally and locally. In the short term, government reiterated that the current round of plans in development such as the GNLP must be adopted by the end of 2023. In the longer term, it pointed to a quicker, more certain,

digitised planning system, with an enhanced role for local plans as the main means of public engagement on site selection and development.

Housing numbers for plans - Housing need is established locally using a national standard methodology. Changes proposed to the methodology prior to and as part of the government's August 2020 consultation have subsequently been amended and household projections and affordability data which form part of the methodology are regularly updated. Consequently, though housing need figures have changed somewhat and will change further over time, it is necessary to fix on an appropriate number to produce a plan. In addition, the need is a minimum for any plan, with local plan housing provision also having to take account of economic growth potential and of providing a buffer to ensure delivery of the housing required to address the housing crisis. The approach taken at the Regulation 18 stage of plan-making, which included a number of preferred options and alternative approaches for policies and sites, including consulting on the amount of growth and its proposed locations, has provided flexibility to make changes between plan-making stages.

Sustainable growth – the GNLP promotes the right types of growth in the right locations to facilitate post Covid-19 economic recovery, promote the post-carbon economy, address climate change impacts and support services in our communities. This has been done by maximising the potential of brownfield sites, supporting high technology employment growth, particularly in the Cambridge Norwich Tech Corridor, and providing for greenfield sites for housing growth on the edge of the urban area, towns and villages.

Protecting and enhancing habitats - to ensure growth does not have a negative impact on internationally protected habitats, work has been undertaken at the county level on addressing increased visitor pressure on those habitats. The plan also provides for the protection and enhancement of locally significant habitats and will follow on from the success of the JCS in providing improved green infrastructure.

Representations

6. **No representations have been made that in the view of officers would require further Regulation 18 consultation or a repeat of the Regulation 19 stage.** However, some representations have raised issues which must be addressed before submission, and possibly before and at the examination. In particular, work on protecting key habitats will need to be agreed with Natural England, at least in principle, to enable submission. This is set out in section 3 of this report.
7. Section 4 covers issues which are not considered to require further work prior to submission but seem likely to be dealt with at examination.
8. Overall, 1,316 representations were made on the plan (263 support and 1,053 objections). Appendix 1 provides information on the numbers of representations made in relation to different policies. Please note that this only gives a broad overview of

where concerns and support lie. This is because, for example, considerable concerns about the choice of a housing site in Hingham has been expressed primarily through a co-ordinated representation submitted by the town council rather than through large numbers of separate representations.

9. Appendix 2 provides a concise summary of the main issues raised. It is broadly organised on a policy and thematic basis, though in some cases organisations are named for clarity. A more detailed summary of representations made by different individuals and organisations, which is part of the Statement of Consultation to accompany submission of the plan, and which includes officer responses to the representations, is available [here](#). The full representations made, without officer responses, are available from the GNLP website [here](#).

Section 3 - Issues being addressed ahead of submission and beyond

10. It is anticipated that a number of issues raised through representations will be addressed, in many cases prior to, but in some cases subsequent to, submission. These are issues on which agreement can be made, or common ground identified with some outstanding elements to be debated at examination.
11. These issues will be addressed through Statements of Common Ground with organisations leading to proposed minor modifications to be submitted with the plan, or simply by the authorities proposing minor modifications to accompany submission without the need for a statement.
12. Main modifications, such as major changes to policies, cannot be made at this stage of plan-making. If the authorities are of the view that such major changes are required, another Regulation 19 stage would have to take place, or even a return to the Regulation 18 consultation stage. However, such modifications can be consulted on at examination and then recommended by the Inspector's report of the examination to enable the plan to be adopted.
13. Table 1 below sets out ongoing and anticipated work of this type. Members will be updated on progress on this work at the GNLP meeting and subsequently at Cabinets and Full Councils:

Table 1

Issue	Ongoing/required work
Duty to Cooperate (D to C)	<p>The D to C covers strategic scale cross-boundary issues between councils, infrastructure providers and organisations such as the Environment Agency, Historic England and Natural England. More local issues have been raised in some of the representations to the GNLP in relation to the D to C, which in most cases relate to concerns over the consultation process, which is different from the D to C.</p> <p>The most common D to C issue nationally which has created problems for local plans is meeting the excess housing needs of some, mainly urban, areas in neighbouring areas.</p> <p>For Greater Norwich, the Norfolk Strategic Planning Framework (NSPF) provides a series of agreements through its regularly updated Statement of Common Ground which addresses strategic D to C cross-boundary issues. However, in some cases a commitment to future joint work on more specific cross-boundary issues needs to be agreed, such as ongoing engagement with Breckland District Council on water, power and economic synergies which is being addressed through a specific Statement of Common Ground.</p> <p>In other cases, clarification on issues raised at Regulation 19 is required. This is the case with Natural England, with whom in principle agreement will be needed on addressing the issue of visitor impact on internationally protected habitats. This requires the signing of a Statement of Common Ground prior to submission of the plan. This follows from the GIRAMS work, undertaken under the NSPF, to identify avoidance and mitigation measures for potential recreational impacts, which is not yet approved. It is critical that this in principle agreement is reached through a Statement to enable the GNLP to be submitted, as compliance with the Habitats Regulations it relates to is a legal requirement. Lack of agreement with Natural England could also be judged to be a D to C failure which would prevent examination of the plan. There is a lot of work to do on this which risks the timing of submission on July 30th. If this is not achievable, submission should be considered for September.</p>
Gypsies and Travellers	<p>No sites have been submitted through the plan-making process to address evidenced need. Failure to provide for the evidenced need through specific sites in addition to the criteria-based policy for assessing applications (in policy 4 on Homes) is potentially a risk to the plan being found sound. Consequently, we are proactively engaging with existing families/site owners to explore the potential for acceptable expansion of existing sites through the development management process and continuing to explore options to find suitable land in public ownership on which to bring forward a site.</p>
Evidence updates	<p>Work is also ongoing to supplement and update the evidence base (partly in response to representations) including:</p> <ul style="list-style-type: none"> a. A request from Historic England for Heritage Assessments for a number of proposed sites (mainly in the city centre) and inclusion of other heritage evidence;

	<ul style="list-style-type: none"> b. More detail on the timing of the delivery of sites in the housing trajectory; c. Supplementary viability information; d. Updated information on housing, including the types of homes required; e. Updating of the Habitat Regulations Assessment (HRA) to explain the situation and further justify its conclusions relating to the GIRAMS and the finalisation of the Water Cycle Study.
Minor modifications	Minor modifications to the text (not the policies themselves) of the plan will be submitted mainly to address representations from Historic England, Natural England, the Environment Agency and Anglian Water. These largely relate to the Vision and Objectives, policies 2 (Sustainable Communities), 3 (Environmental Enhancement) and 4 (Infrastructure), as well as a number of site allocations. Other proposed minor modifications will cover the limited number of errors identified.

Section 4 – Potential issues for the examination

14. The actual issues for the examination will be determined by the Inspector taking account of policy and legal requirements, his or her own judgement and the representations that have been made.
15. In the light of the representations made, national policy/guidance and experience of previous examinations, the three key issues for the plan's examination (if submitted) are most likely to be:
 - a. The overall housing numbers and the locations and deliverability of growth, including site viability and the impact on climate change;
 - b. Addressing Habitats Regulations visitor pressure issues through an agreed approach with Natural England;
 - c. Provision of a site/s to meet the needs of Gypsies and Travellers (though this has not been a focus of representations, expert advice is that this is an issue).
16. Taking account of the broad range of representations made, and subject to progressing the matters set out in the recommendation, officers recommend that the plan as drafted can be submitted. We are confident that well-reasoned arguments can be provided at examination to justify the approach taken in the plan in relation to the issues raised in representations.
17. Table 2 below provides officer summaries of the potential issues for the examination based on the representations that have been made, with officer responses in relation to these issues which will be worked up further as we head towards examination. A number of the representations highlight different interpretations of the National Planning Policy Framework and its supporting guidance.
18. As referenced in paragraph 9 above, Appendix 2 provides further detail of the representations, with full representations available [here](#).

Table 2

A. Process Issues		Officer Response
Site Selection	<p>The process has been questioned at different levels of the hierarchy, including:</p> <ol style="list-style-type: none"> 1. the role of Sustainability Appraisal (SA) e.g. for sites on the edge of Hellesdon in Horsford parish, with a legal view submitted questioning site selection soundness; 2. Aylsham (the inclusion of an additional site at the Regulation 19 stage – see below); 3. Key Service Centres (particularly site selection in Hingham); 4. Village Clusters (the site selection process involving school catchments has been questioned). 	<p>In relation to representations on the process of plan-making, there is confidence that the approach we have taken is sound. This includes site selection, the use of SA, the Duty to Cooperate and the consultation process overall, including the increase in housing numbers and consequent inclusion of additional sites at the Regulation 19 stage (see below).</p> <p>The role of the SA in site selection and the wider process used in assessing sites have been clearly set out and recorded, with criteria which reflect national planning policy, county-wide and local priorities provided to guide that selection. The introductory section of the Sites Plan explains the process used and settlement booklets identify why the sites were selected in each settlement.</p>
Dependent plans	<p>The role and timing of the South Norfolk Village Clusters plan (including evidencing the amount of growth), along with the Diss and area Neighbourhood Plan's role in allocating sites has been questioned.</p>	<p>There is flexibility in how Local Plans are produced so that they can be either single or multiple volume documents. In addition, Neighbourhood Plans can allocate sites. The emerging village clusters plan in South Norfolk, now being consulted on, provides evidence that the growth required by the GNLP can be provided for in sustainable locations.</p>
Changes from Regs 18 to 19 (lack of Reg 18D consultation)	<ol style="list-style-type: none"> 1) The lack of consultation on both the overall numbers and additional sites/increased numbers has been criticised (this has particularly been raised in relation to Acle, Aylsham, Horsham St. Faith and Lingwood); 2) The inability to comment on and change settlement boundaries has been raised. 	<p>The 2012 Planning Regulations anticipate that there will be changes in whatever has been consulted upon after the Regulation 18 consultation. It is very common for new sites to be proposed for allocation for the first time at the Regulation 19 stage either because they have only recently become available or the local planning authority needs to supplement its allocations in order better to meet needs.</p> <p>At the Regulation 18C draft plan stage of the GNLP, overall housing numbers were consulted on, alternative sites were</p>

		<p>consulted on as well as those proposed for allocation, and new sites were submitted.</p> <p>The system of plan preparation would be rendered very inflexible if such changes required a further regulation 18 consultation.</p> <p>The decision to not include revisions to settlement boundaries in the plan resulted from the timetable changes stemming for the release of the “Planning for the Future” white paper. Amendments will be possible through any future review of development management policies.</p>
B. Plan content		
Overall housing growth	<p>Representations from different organisations and individuals state opposite views that the plan provides for:</p> <ul style="list-style-type: none"> • Too little housing growth (it doesn’t reflect economic aspirations and there is questioning of the methodology re. housing numbers); • Too much growth (housing need + a 5% buffer is sufficient, insufficient account has been taken of climate change, with the South Oxfordshire plan referenced as a plan challenged on the scale of growth in relation to climate change). <p>Also -</p> <ol style="list-style-type: none"> a) Windfall – a greater or lesser focus should be placed on windfall in calculating housing numbers, and policy 7.5 is considered unworkable; b) Contingency – more contingency sites are required versus none are needed. 	<p>The level of housing need for Greater Norwich is identified by using the government’s standard methodology. Sites do not always deliver as expected so the housing provision figure includes a buffer to address this fallout and ensure delivery of the identified need. The housing provision figure for the plan also provides additional flexibility to allow for higher potential levels of need should this arise as suggested by evidence from the 2018 household projections and through stronger economic growth. If the market for this additional housing does not materialise, they will not be provided.</p> <p>The challenge to the South Oxfordshire plan concerning the scale of growth and its climate change impacts was unsuccessful. Meeting housing need was identified as a key consideration as well as addressing climate change as plans need to provide for economic, social and environmental sustainability.</p> <p>The approach to windfall, which allows for some of the likely delivery to be included as part of overall housing provision, is considered appropriate. As windfall delivery is likely to remain robustly high, it is appropriate to include a limited</p>

		<p>proportion as part of total potential delivery.</p> <p>One contingency site is included should this prove to be required due to low delivery of allocated housing sites.</p> <p>The overall approach, including to windfalls, contingency and having a significant buffer, builds in flexibility to support higher than trend economic growth incorporating the Greater Norwich City Deal if this were to occur.</p>
5-year land supply	Representations (from some in the development industry) question the proposed approach to the 5-year land supply which is based on the housing need identified through the standard methodology without including the buffer.	The figure of 49,492 is potential housing delivery during the plan period, not the housing need. The need is 40,541, calculated using the standard methodology. The latter is proposed to be used to calculate 5-year housing land supply.
The location of growth	<p>1) Settlement hierarchy</p> <p>i) Suggested changes (all to include more growth in specific locations):</p> <p>(1) Wymondham should be a Large Main Town;</p> <p>(2) Mulbarton, Scole and Horsford should be Key Service Centres (KSCs);</p> <p>(3) A separate countryside category is needed.</p> <p>ii) The amount of growth in different parts of the hierarchy:</p> <p>(1) More vs. less in the urban area (sustainability + availability of sites from city centre decline vs. deliverability and market saturation issues), over reliance on Strategic Regeneration Areas with limited evidence (East Norwich and Northern City Centre) and the North East Growth Triangle.</p>	<p>1) The Settlement Hierarchy, which is based on evidence of the services available in different settlements, is considered to be appropriate. Open countryside is in the village clusters level of the hierarchy</p> <p>The overall growth strategy, including housing and jobs numbers and locations, is considered to be well-evidenced and to meet the plan's objectives. This will be achieved by focussing the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and addressing climate change impacts. At the same time, the strategy allows for some growth in and around smaller villages to support local services. Our strategy maximises the potential of brownfield land and accessible greenfield sites. The strategy also offers a range of types and locations of sites which will help to ensure that the broad range of housing needs of our communities are met, enhancing delivery of the housing by providing opportunities for a range of house providers.</p>

	<p>(2) More/less growth in towns (less in Aylsham, more in Wymondham and Diss, new sites needed in Long Stratton).</p> <p>(3) More/less growth in KSCs – different views with focus on more in Brundall, Hethersett, Loddon, Poringland, Reepham and Wroxham vs. less in Reepham and a different site in Hingham;</p> <p>(4) More/less growth in village clusters.</p> <p>2) The lack of a Green Belt has been criticised;</p> <p>3) New Settlements – there has been questioning of the lack of inclusion of new settlements, whilst an alternative view stated is that policy 7.6 should not prejudice the next plan;</p> <p>4) The Cambridge Norwich Tech Corridor (CNTC) should be a greater focus for growth;</p> <p>5) Undeliverable sites with no promoter or developer should not be in the plan.</p>	<p>2) Regulation 18 included consultation on the potential for a Green Belt. The strategic approach of protecting valued landscapes including strategic gaps provides the policy coverage required. Establishing a Green Belt for the future at this stage will reduce flexibility and place pressure for additional growth required in the future on those areas not included in any Green Belt.</p> <p>3) The GNLP does not allocate any of the proposed new settlements as there are considered to be enough sites to meet needs in and around existing settlements. The strategy takes account of the Government's proposed changes to the planning system, with policy 7.6 setting out the intention to bring forward a new settlement or settlements through the next strategy and sets out a timetable for that work.</p> <p>4) Forming part of the defined Strategic Growth Area, the CNTC is a major growth focus. Due to high levels of existing commitment in locations such as Wymondham, Hethersett, Cringleford and Easton which are already strategic locations for growth, only limited additional housing numbers have been added in these locations in this plan.</p> <p>5) Further evidence will be submitted showing that undeliverable sites have not been allocated in the plan.</p>
Sites subject to significant/most representations	<p>1) East Norwich (the main concerns are over capacity and deliverability, including from Historic England);</p> <p>2) Anglia Square (the policy should be amended to reflect recent changed intentions concerning the site);</p> <p>3) The UEA Grounds Depot (the allocation should be deleted as the Yare Valley is a priority Green Infrastructure corridor);</p>	<p>Concerns over specific sites and locations for growth will be a key part of the examination and it will be for the Inspector to decide whether modifications are required to the policies we submit. As set out above, officers are confident that the site selection and plan-making process raised in relation to some locations has been sound.</p>

	<p>4) Aylsham (the main concerns are over the process of adding a further site at the Regulation 19 stage and over infrastructure capacity);</p> <p>5) Hingham (the main concern is over site selection);</p> <p>6) The Showground (the main concern is over transport capacity);</p> <p>7) Lingwood (the main concern is over the site selection process adding a new site at the Regulation 19 stage);</p> <p>8) Foulsham (the main concern is over an historic hedgerow);</p> <p>9) Colney (the main concern is over the non-selection of a site).</p>	
Transport	The Norwich Western Link (NWL) should not be in plan, there is insufficient focus on walking, cycling and other sustainable transport and too much focus on aviation.	Although it is not a specific plan proposal, the inclusion of the NWL road reflects its progress by Norfolk County Council as an infrastructure priority, with a Preferred Route announcement made in July 2019. This applies to other improvements to transport including to the airport, rail services, trunk and primary roads and measures to promote active and sustainable transport which are also included in the GNLP.
Climate change	There is insufficient coverage of climate change issues which should be the basis of the plan. This includes the amount, distribution and timing of growth, inadequate targets and monitoring, an inadequate approach to energy and water efficiency and flood risk.	<p>The climate change statement in the GNLP strategy sets out and justifies the broad ranging approach the plan takes to tackling climate change.</p> <p>As set out above, the strategy focusses the great majority of growth in the Norwich urban area and in and around our towns and larger villages, thus reducing the need to travel and helping to address climate change impacts. It also allows for some growth in and around smaller villages to support local services, the loss of which would generate the need for more journeys.</p> <p>The overall housing numbers in the plan are suitable to address the housing shortage in the area, allow for sustainable economic growth to contribute to post Covid-19</p>

		<p>recovery and the move to a post-carbon economy.</p> <p>The climate change targets in the plan are intentionally linked to those of the government to reflect the fact that national targets regularly change so it is appropriate that GN should contribute to those national targets. Thus, targets will be updated locally when they change nationally, as with changes made by the government this year.</p> <p>The GNLP contains policies which cover all relevant aspects of the emerging NSPF proposals for how local plans in the county should address climate change. Minor modifications to the GNLP's Delivery and Climate Change Statement and relevant text supporting policies will be submitted to provide updates on how this emerging policy advice (in agreement 19 of draft NSPF) is addressed. This is mainly achieved through the design of development required by Sustainable Communities Policy 2. The policy covers a broad range of issues related to climate change including access to services and facilities, active travel, electric vehicles, energy and water efficiency, flood risk, sustainable drainage, overheating and green infrastructure.</p>
Infrastructure	Provision is insufficient to support growth (especially for health and schools).	Appendix 1 setting out the infrastructure required to serve growth is based on evidence collected in the GNLP Infrastructure Needs Report. This has been produced by working with the relevant infrastructure providers, including Norfolk County Council for schools and health care providers for health facilities, so are the best available information which provides a planned approach to meeting growth needs. Updates will be made on an ongoing basis if and when circumstances change.
Housing	1) Affordable housing (AH) – the policy would over-deliver against need, there should be no AH requirement on student developments;	1) The homes policy is well evidenced. The affordable housing targets are based on evidence of need and have taken account of viability. Affordable housing is required on student accommodation

	<p>2) The Accessible homes and space standard requirements are not evidenced;</p> <p>3) Elderly needs should be covered by more allocations, not just general policy support;</p> <p>4) Self /Custom build shouldn't be a fixed percentage.</p>	<p>away from UEA. This is required as without doing so, the delivery of sites for student accommodation would reduce the ability to address affordable housing needs.</p> <p>2) The standards set for accessible and adaptable homes are also based on evidence of need and have taken account of viability</p> <p>3) Allocations have been made for and including housing for older people and policy 5 allows for such accommodation to be provided on any housing site.</p> <p>4) Promotion of self/custom build is a government priority. The requirement for at least 5% of plots on sites of 40 dwellings plus will support their delivery. It will not be applied if lack of need can be evidenced.</p>
Evidence	<p>Questioning of:</p> <ul style="list-style-type: none"> a) The validity of the Viability study; b) The Habitat Regulations Assessment (HRA) (and Water Cycle Study); c) The Statement of Consultation and lack of compliance with the South Norfolk Statement of Community Involvement; d) Sustainability Appraisal (SA) <ul style="list-style-type: none"> I. Non assessment of reasonable and strategic alternatives; II. Flawed assessment of specific sites; III. Supports a different strategy (there should only be limited new development in the KSCs and villages); IV. Inclusion of a contingency site is not justified; V. Carried forward sites have not been treated comparably with others; <p>5) Inadequate on carbon assessment and addressing climate change.</p>	<p>All evidence, including the Viability Study, HRA and SA has been produced by appropriate and experienced professional consultancies using the approaches required by government. As such, the evidence is considered to be robust. Discussions on the evidence base and how it has assisted in forming policy will be an important part of the examination.</p> <p>The process of plan-making, which has included three stages of Regulation 18 consultation, is considered to have complied with requirements.</p>

The Examination

19. The Inspector may, having considered differing views at examination, recommend that main modifications are required for the plan to be found sound. The authorities would have to consult on these and bring them back to the Inspector. If this does prove to be the case, members can only adopt the plan with these main modifications included. Main modifications could relate to any substantive aspect of the plan.
20. If the Inspector takes the view that there is a more serious cause for concern in relation to a major aspect of the strategy, such as the amount or the broad distribution of growth, he or she may write to the planning authorities before the hearings asking why the particular approach was adopted. Then, following initial hearings, if the Inspector concludes that an aspect of strategy is unsound, he or she may adjourn the hearings and issue an Interim Report, setting out what is considered necessary to overcome the concerns. During the adjournment, quick decision making would be required from the authorities to decide how best to proceed and bring proposals back to the Inspector.

Section 5 – Conclusion

21. To reiterate, the representations have identified no significant issues that cannot be addressed or are such a risk to the GNLP that it should not be submitted in the near future.
22. However, the timing of the submission of the plan will be key. This is particularly the case in relation to agreeing the principles of how the Habitats Regulations will be addressed with Natural England. Without this there are significant questions over the legal compliance of the plan and so its submission should be delayed. If the issues set out in the recommendation can be overcome in a short period of time, officers recommend that the plan should be submitted on July 30th. If not, delays until at least September this year will result. If submission were to be delayed to September, the plan should still be able to be adopted within the government's deadline of the end of 2023. The GNLP and then Cabinets and Full Councils will be informed of progress on these key issues to assist their consideration of submission of the plan.

Appendix 1

Representation numbers

This appendix gives a broad overview of those parts of the plan on which the most representations were made. Overall, 1,316 representations were made on the plan (263 support and 1,053 objections). As set out in paragraph 8 of the report, this is only an indication of how wide concerns or support is on issues as co-ordinated representations have been made by some groups and organisations.

Strategy

Section/policy with the most representations:

1. Policy 1 – The Sustainable Growth Strategy (86 reps)
2. Section 2 – Greater Norwich Profile (79 reps)
3. Section 3 – The Vision and Objectives (65 reps)
4. Policy 5 – Homes (57 reps)
5. Policy 3 – Environmental Protection and Enhancement (48 reps)

Section/policy with the most support comments:

1. Section 2 – Greater Norwich Profile (25 supports)
2. Policy 7.1 – The Norwich Urban Area (14 supports)
3. Section 3 – The Vision and Objectives (12 supports)
4. Policy 2 – Sustainable Communities (12 supports)
5. Policy 3 – Environmental Protection and Enhancement (10 supports)

Section/policy with the most object comments:

1. Policy 1 – The Sustainable Growth Strategy (78 objects)
2. Section 2 – Greater Norwich Profile (54 objects)
3. Section 3 – The Vision and Objectives (53 objects)
4. Policy 5 – Homes (51 objects)
5. Policy 3 – Environmental Protection and Enhancement (38 objects)

Sites

Sites with the most representations

1. General Aylsham text and settlement map (68 reps)
2. Policy 0596R – Aylsham (55 reps)
3. General Foulsham text and settlement map (30 reps)
4. East Norwich Strategic Allocation (21 reps)
5. Policy 0605 – Foulsham (18 reps)

Sites with the most support comments:

1. East Norwich Strategic Allocation (5 supports)
2. General Taverham text and settlement map (5 supports)
3. General Poringland text and settlement map (5 supports)
4. Policy 0401 – Norwich (4 supports)
5. Policy CC4 a and b – Norwich (4 supports)

Sites with the most object comments:

1. General Aylsham text and settlement map (67 objects)
2. Policy 0596R – Aylsham (54 objects)
3. General Foulsham text and settlement map (30 objects)
4. Policy 0605 – Foulsham (17 objects)
5. East Norwich Strategic Allocation (16 objects)

Appendix 2

Summary of Main Issues raised

1. The Strategy

Foreword and Introduction

Topic	Main Issues raised
Engagement with Breckland	Breckland DC wants to engage on proposals for new settlements and the South Norfolk villages, particularly to understand how development will impact on power and water infrastructure and to investigate the potential for economic synergies in the Cambridge Norwich Tech Corridor (CNTC). A range of comments covering these issues have been made in relation to a number of elements of the text and policies of the plan. Officers from the GNLP team and Breckland are working together to address consequent concerns raised over the D to C through a Statement of Common Ground (SoCG) on further future co-operative work.
The amount of housing growth	The housing number is unnecessarily high. There is no need to increase the number of houses to be built way beyond the number required by the standard methodology.
Location of growth	<ol style="list-style-type: none">1. Questioning of the North Rackheath allocation concerning the continued interest of developers; and, the viability of providing policy compliant levels of affordable housing2. The Cambridge Norwich Tech Corridor links universities in Cambridge and Norwich with research institutes and science parks, so it is questioned how the large number of homes planned for the North East Growth Triangle links to the employment in the Tech Corridor.3. Concentrating large developments on the edge of Norwich counteracts endeavours to secure an appropriate level of housing in rural villages.4. Mixed messages have been given over Wymondham - removing the 1,000-home contingency is unjustified. Furthermore, that the GNLP over relies on windfall sites, and that the South Norfolk Village Clusters Housing Site Allocations Local Plan cannot be relied upon. <p>A lack of consideration has been given to proposals in North Norfolk. Recent announcements regarding a development of 300+ houses at nearby Badgersfield will have an impact on Aylsham, as the majority of children from Badgersfield attend Aylsham High School.</p>
Process	<ol style="list-style-type: none">1. Historic England has concerns about development management policies not being reviewed concurrently with the GNLP, and particularly the lack of a strategic policy framework for taller buildings and the skyline, the detailed approach to designated and non-designated heritage assets and heritage at risk.2. The GNLP should have regard to the East Marine Plans, paying attention to the policies and guidance published by the Marine Management Organisation, as well as fulfil Duty to Cooperate obligations.3. Criticism of the approach taken to Aylsham, especially the lack of public consultation amidst the pandemic about the addition of a second site and increasing the total housing requirement to 550 homes.

	<ol style="list-style-type: none"> 4. Not holding the Reg. 18D consultation means there has been no opportunity to comment on the suitability or otherwise of new sites which were brought forward during and around the Reg. 18C consultation, nor to comment on any amendments to policies made since publication of the Reg. 18C consultation documentation. 5. To address climate change, the number of new allocations, particularly in less sustainable locations such as in most of the village clusters, should be kept to the legal minimum. Legal challenges such as that being pursued in South Oxfordshire make it clear that the soundness and legal compliance of Local Plans can be challenged on climate change grounds. Central to this challenge is the contention that South Oxfordshire District Council's Local Plan fails to comply with the Climate Change Act 2008 because of the amount of homes. 6. The GNLP and the South Norfolk Village Clusters Housing Allocations (SNVHCA) should follow the same, or at least a very similar, timetable. 7. The Reg. 19 GNLP Climate Change Statement states that 'growth in villages is located where there is good access to services to support their retention'. It is impossible for this statement to be accurate given the decoupling of the SNVCHA from the GNLP. 8. The decision not to pursue a Green Belt was taken without a full assessment of the evidence, raising questions about both the legal compliance and soundness of the Plan. To address this, CPRE Norfolk suggests a Green Belt on the 'green wedges' model. This evidence is presented in a paper by CPRE Norfolk: 'A Green Belt for Norwich?' 9. There should be closer collaboration in respect of Wroxham/Hoveton. More mention should be made of the numerous neighbourhood plans undertaken at great cost and by a lot of hard work by volunteers. There should also be some acknowledgement of the joint strategic collaboration between Broadland and South Norfolk councils and their joint management teams.
Sustainability + Environmental Impact	<ol style="list-style-type: none"> 1. Clarity is needed on the overall sustainability and environmental impact of the plan in its entirety, including the cumulative sustainability appraisal testing of other plans accompanying the Reg. 19 GNLP. The suggestion is a matrix/progress table for existing policies and allocations – from other existing and proposed DPDs and AAPs, as well as other commitments not already included in policy; 2. The GNLP should list the environmental assets of the area against the System of Environmental-Economic Accounting (SEEA).
GNLP legibility	Acknowledgement is sought that the lessons from the Joint Core Strategy concerning plan legibility have been learnt.
Future proofing	<ol style="list-style-type: none"> 1. There is a need for further analysis about how the Covid-19 pandemic has and is changing peoples' behaviours, and how the GNLP should be future-proofed against these changes. There should a statement in the introduction on how the plan is going to be continually reviewed, and reference made to the Tomorrow's Norfolk, Today's Challenge strategy. 2. The "Planning for the Future" White Paper will quickly supersede the GNLP - it would be helpful to see each council's representations to the Government's proposed changes to the planning system.

Norwich Western Link (NWL)	The NWL, and for some other large-scale road building promoted in the plan, is incompatible with the climate change statement and various other plan statements, ignores the fact that road construction induces demand and is environmentally destructive.
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Greater Norwich Profile

Topic	Main Issues raised
Norwich Western Link (NWL)	As above.
Other transport issues	<ul style="list-style-type: none"> • The GNLP should not commit to expanding the highly polluting and unsustainable aviation industry in policy 4; • Sustainable transport should be part of decision making, be included in the plan and form part of the assessment for development sites; • Respondents dispute the claim that the cycle network is good; • Compulsory installation of electric vehicle charging points is required in houses; • There should be a greater focus on hydrogen-based energy and transport solutions; • Tension exists between carbon emissions being above the national average in rural parts of the area (partly due to a greater reliance on car journeys), the target to reduce carbon emissions, the lack of frequent low-carbon public transport, and the excessive numbers of housing planned.
Housing numbers and Green Belt	<ul style="list-style-type: none"> • CPRE Norfolk view that: <ul style="list-style-type: none"> ○ non-inclusion of a Green Belt (suggested on the 'green wedges' model) is unsound. ○ housing numbers are too high and should be based on the standard methodology + a 5% buffer (this view is shared by individuals, who also state that Brexit and Covid-19 will reduce housing need). • Population projections may change and economic forecasts are too optimistic. By putting forward a higher number of homes to be built, the increase in supply will increase the demand. • Objection to traditional planning approach analysing past trends, projecting them into the future and converting the figures into land requirements. • The 2018 household projections do not actually go far enough. There is no 'slack' in the plan for unexpected growth, or growth in the most sustainable locations.
Location of growth	The proportion of greenfield development (78%) is too high especially as office/ retail space in the city centre will be available for redevelopment.
Engagement with Breckland DC	As above.
Infrastructure Needs	The plan needs to refer to the Health and Wellbeing section to the Norfolk Joint Strategic Needs Assessment (JSNA) which is the standard tool when predicting future health needs and trends in order to inform on housing and other factors.

Views from groups and about specific locations	
Norwich Green Party	<p>The Norwich Area Transportation Strategy has been successful in reducing vehicles entering the city centre and increasing the numbers of journeys on foot and by bike, but is a very long way from delivering an upgraded bus infrastructure plan (in the JCS). Suggest that:</p> <ul style="list-style-type: none"> • text and policies should place a greater focus on sustainable transport; • county council seeking much larger road schemes than is necessary for addressing localised problems or for serving new development. <p>The following changes are needed /considerations should be taken account of:</p> <ul style="list-style-type: none"> • An overall carbon budget for Greater Norwich to 2050 consistent with the Climate Change Act 2008 is needed, supported by a strategy and policies in line with the carbon budget trajectory. The Tyndall Centre shows Norwich must cut its carbon emissions by 13% every year to meet its contribution to Net Zero, Broadland and South Norfolk must make cuts of 13% and 14.25% respectively. Carbon emission contribution to sea level rise is a concern. • A lower housing number (42,568 dwellings plus a 5% buffer) is needed resulting in lower development pressures on greenfield sites; • Growth should be concentrated in high density low car developments close to sustainable transport hubs, with a higher concentration around Norwich; • No dispersal of development to small villages which lack services; • No new garden city settlements in open countryside distant from railheads; • Protection of Green Wedges around Norwich; • Development should be built to zero carbon standards that include renewable heating based on renewable energy generation; • Retrofitting of historic development needed; • A transport strategy is needed based on traffic reduction and a high degree of modal shift to bus, walking and cycling; • Norwich Western Link should be abandoned and there should be no further major increases in road capacity; • High nitrogen dioxide levels should be addressed, notably at Castle Meadow.
Natural England	<p>The natural environment section is incomplete, with more focus needed on biodiversity loss, climate change, habitat fragmentation, pollution etc and how the proposed plan may impact on and address these issues. The plan also needs to recognise that recreational disturbance impacts affect not just internationally designated sites, but also locally protected sites.</p>
RSPB	<p>The plan needs to cover other land use categories where soil is an important resource e.g. peat soils provide for carbon capture + habitats.</p>
The Environment Agency	<p>There is no information about the Water Framework Directive (WFD) and risk to water quality. No links are made to risk from development, or that preventing deterioration is a requirement.</p>
Stop Norwich Urbanisation (SNUB)	<ul style="list-style-type: none"> • Questions how London in 90 and plan for a rail halt at Rackheath are addressed; • The expense of exemplar eco-homes in Rackheath questions how planners can insist on deliverable carbon neutral housing; • More references to sustainable drainage systems are needed.

Location specific representations	<ul style="list-style-type: none"> • The plan should acknowledge that development at Rackheath will affect the village of Salhouse due to shared facilities; • Coltishall PC has concerns about the village suffering further from traffic growth due the NWL road and dispersed housing development; • A development promoter supports the Strategic Housing Market Assessment. requirement of 3,900 additional communal establishment places for over 75s. A non-allocated care village at Barnham Broom has potential to help to meet the need; • Concern from Bunwell PC about how large-scale developments, such as at Long Stratton, affects villages e.g. high school capacity; • Concerns over primary and secondary school capacity and funding due to the delay in the Rackheath North development; • Aylsham needs a new primary school now and cannot wait until new development is partially or fully completed; • Colney Hall should be removed from the plan as it is outside settlement boundaries; • BAW 2, Bawburgh and Colney Lakes is allocated for a water-based country park but the 2009 Colney Parish Plan suggested a much less intrusive approach. The BAW 2 land should be part of a Norwich Greenbelt involving the Yare Valley.
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Vision and Objectives (V + O)

Topic	Main Issues raised
Support	
Community Facilities and Green Infrastructure	<ol style="list-style-type: none"> 1. Sport England support the development of sustainable communities with good access to green infrastructure, sports facilities, and better opportunities to enjoy healthy and active lifestyles. 2. Rackheath PC state that any new community facilities should be offered within the remit of the Parish Council. 3. Norfolk Biodiversity Partnership support access to greenspace as a key part of what makes a community healthy and attractive.
Water Quality	The Environment Agency supports the V + O but would like to see additional wording on water quality.
Objections	
Scale of growth	The scale of growth is incompatible with achieving the V + O.
Location of Growth	<p>Reps. from the development industry:</p> <ul style="list-style-type: none"> • A new settlement or garden village would better achieve net zero carbon emission development better than 'edge of settlement piecemeal growth'. • The Vision should be strengthened on the importance of the economy in the countryside. <p>Other reps. have stated that windfall conceals the scale of development proposed in villages in South Norfolk.</p>

Growth in Main Towns and KSCs (particularly Aylsham)	<p>Concern expressed by individuals and the Town Council that additional growth in Aylsham included in the Regulation 19 draft plan:</p> <ul style="list-style-type: none"> ○ Is not compatible with the objectives that <i>people should have access to facilities and protecting and enhancing the distinctive characteristics of towns</i>; ○ Will make the scale of growth in Aylsham so great (at 15%) that it will not be possible to integrate existing and new communities; ○ Has not been consulted on and/or gone through the full democratic/plan-making process; ○ Will not be supported by adequate infrastructure, with concern over the need for timely provision of a primary school and transport issues; ○ Extra housing would have to meet carbon neutral standards to ensure greater efficiency in water and energy usage to achieve the V + O. <p>Concern also expressed over the scale of growth in main towns and KSCs overall, in particular in Reepham.</p>
Norwich Western Link (NWL)	<p>Reps. on the NWL from the “Stop the Western Link” campaign (SWL), which comprises ecologists, scientists, lawyers, academics and environmentalists:</p> <ul style="list-style-type: none"> ○ argue that the NWL should be suspended; ○ strongly object to the inclusion of the NWL within the GNLP, stating the plan purports to exclude the NWL when it is manifestly obvious the intention is to include it. SWL finds this pretence to be wholly objectionable. <p>A number of individuals and the CPRE are also oppose the NWL on environmental grounds (destruction of valuable habitats and damage to chalk streams), stating it is in conflict with the green agenda that is expressed later in the strategy, including reducing private car journeys and emissions.</p>
Historic/Natural Environment and Landscapes	<ol style="list-style-type: none"> 1. Representations from Historic England and Natural England propose changes to text on the environment. Historic England have also requested protecting landscapes to be in the V + O. 2. RSPB request clarification on how and by whom the environment will be maintained and enhanced, pointing to the role of landowners.
Quality and density of homes	<p>CPRE contends that it is impossible to ensure that homes will be built at appropriate densities in relation to local character given the independence of the plan for the South Norfolk villages, including concerns over the “minimum” 1,200 figure in the South Norfolk clusters as this has not been consulted on and figures could be much higher.</p>
Carbon monitoring and targets	<p>The Centre for Sustainable Energy recommends taking an approach similar to Manchester based on analysis carried out by the Tyndall Centre which considers baseline emissions and sets a carbon budget. It also suggests that the economy objective should be more explicit about carbon emission reductions and that the infrastructure objective is strengthened to reflect the scale of infrastructure provision required to deliver zero carbon. Other representations have pointed to:</p> <ul style="list-style-type: none"> • the need for a comprehensive baseline, targets and monitoring of the plan based on reductions from 1990 carbon emission figures; • the need to reduce transport emissions in rural areas which should be key to the growth strategy by reducing growth in rural areas.

Working with Breckland	Breckland DC comments as above.
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Delivery and Climate Change Statements

Topic	Main Issues raised
Delivery Statement	
Legal process	Reps. from members of the public in relation to Reepham and Aylsham questioned the legality of the plan-making process in relation to consultation (particularly in relation to additional housing numbers and sites at the Regulation 19 stage), including failure to engage with those parish/town councils through the Duty to Cooperate or to take note of local views expressed through consultations.
Working with the private sector	The GNLP committing to working with the private sector to overcome constraints to planning is an insult to all who live and work in communities, including all town and parish councils.
Location of growth	<ol style="list-style-type: none"> 1. Development should be concentrated within the Norwich urban area; 2. The plan should allow for more employment development within the countryside where a rural location can be justified.
Infrastructure	Reference should be made to Norfolk Constabulary's potential infrastructure needs.
Climate Change Statement	
	The Environment Agency supports the climate change statement.
Growth in Aylsham	Additional growth in Aylsham with two sites on the edge of the settlement is not compatible with reducing carbon emissions.
Norwich Western Link road (NWL)	The NWL is incompatible with the climate change statement by leading to increased usage of the private car and increase carbon emissions, as well as damaging the Wensum Valley.
The scale of growth and its environmental impact	<p>Unacceptable climate change and environmental impact of the amount of overall growth with concerns over:</p> <ul style="list-style-type: none"> • resource use, including insufficient standards for energy efficiency (Norfolk Wildlife Trust stated this is the case compared to other authorities) and water efficiency; • the level of population growth, inward migration and continued development, which could better be met elsewhere in the country, being inappropriate for Greater Norwich; • biodiversity (including the need to further promote net gain and green infrastructure in rural and urban areas), reducing overheating, ecosystem protection and the loss of greenfield land; • limited local service provision in new developments; • over reliance on the car and lack of provision for infrastructure for electric cars; • improvements required to rural public transport.
The location of growth	<ol style="list-style-type: none"> 1. The location of growth should address climate change. This should result in inclusion of the "additional" brownfield urban sites, such as those in East Norwich, and the withdrawal of many of the proposed sites in rural locations; 2. The amount of growth in KSCs and the Main Towns is too high.

	The statement and the strategy should be flexible over certain developments which require rural locations and can incorporate sustainability in their design.
Carbon monitoring and targets	<ol style="list-style-type: none"> 1. There's a lack of an effective baseline and carbon reduction targets required for the GNLP to demonstrate how it will meet its legal obligations, with carbon reduction required at the core of all policies; 2. The GNLP approach to carbon reduction is not urgent enough.
Historic environment	Historic England point to the need to reference climate change and the historic environment.

Policy 1 The Growth Strategy

Whilst a number of representations, mainly from the development industry, support policy 1's overall growth strategy, the great majority of representations as set out in the table were objections:

Topic	Main Issues raised
Main issues raised of direct relevance to policy 1	
Procedural Issues	Duty to Cooperate (D to C) <ol style="list-style-type: none"> 1. The GNLP departs from some of the agreements (nos. in brackets) in the NSPF so the D to C has not been met, including: <ol style="list-style-type: none"> a. The planned job growth is not matched by the housing requirement (3); b. The economic needs forecasts use Experian rather EEFM as per the NSPF; c. The housing requirement is not high enough to address the City Deal (13); d. There are insufficient homes for the elderly and students (14). 2. Breckland DC are concerned (particularly over transport issues and energy and water supplies) that there has been insufficient cooperation over the growth in the Strategic Growth Area and South Norfolk villages. 3. A number of respondents (town/parish councils and individuals) have stated that failure to consult sufficiently is a failure on the D to C.
	Consultation <ul style="list-style-type: none"> • The change in housing numbers between Regs. 18 and 19 and the inclusion of an additional site in Aylsham requires additional Reg.18 consultation; • Policies have not followed from the majority consultee response at Reg 18A (on windfall).
	Dependent Plans <ul style="list-style-type: none"> • Can't rely on Diss and South Norfolk Village Clusters sites which will not be tested through the GNLP; • To address the policy vacuum, DM policies for residential applications in the South Norfolk Village Clusters needed.
	New settlements references and policy should be deleted or amended to identify that <i>opportunities will be explored</i> (alongside other options for growth), rather than prejudging a future plan.

Evidence	<ol style="list-style-type: none"> 1. A new Housing/Economic Needs Assessment should be completed before submission. 2. There is no evidence from SoCGs on the anticipated levels of delivery and/or viability of the current or uplifted site allocations. Concerns: <ul style="list-style-type: none"> • that the levels of housing proposed will not be delivered on sites already allocated for over five years; • over a lack of evidence on the uplift in the density on some existing allocations being achievable. 3. Up-to-date evidence base on open space and play is required.
The amount of growth	<p>Climate Change and Growth</p> <ol style="list-style-type: none"> 1. The plan prioritises economic growth and development over legal requirements on climate change, leading to carbon leakage. 2. A large buffer makes it almost certain that climate change targets will not be met. South Oxon's Local Plan makes it clear that plans can be challenged on climate change grounds. 3. Housing numbers should not be above housing need to minimise: <ul style="list-style-type: none"> • embedded carbon emissions in construction; • emissions from energy and transport emissions. 4. The plan has deferred including climate change policies that will deliver the lowest carbon homes despite the recent NSPF (Ag. 19). <p>Overly dispersed growth is not the best strategy re. climate change.</p> <p>Housing need is higher than in the plan because:</p> <ul style="list-style-type: none"> • The standard method has been miscalculated and is a starting point, with the government's aim to significantly increase housing supply; • Full account isn't taken of the needs of students and older people; • There's a shortfall of 3,704 homes from the City Deal; • The SHMA provides support for a higher local housing need, including affordable housing, than the standard method. <p>Clarity on the methodology used to calculate housing need, along with details of the timing of delivery of allocated sites in the trajectory, should be provided on submission.</p> <p>The housing requirement</p> <ol style="list-style-type: none"> 1. The GNLP is ambiguous and there is no housing requirement set out in strategic policies. A number of reps. (from the development industry) criticise the requirement/target for being too low: <ul style="list-style-type: none"> • Based on the higher housing need and the existing JCS trajectory overestimates, the housing requirement should be 53,207 homes, which includes a buffer of around 24% (18,847 homes 2020-26 and 29,120 from 2026-38); • A higher requirement will aid post Covid-19 recovery; • Others state the buffer should be around 20% but should not include any windfall.

	<p>2. A number of reps. (CPRE, green groups, individuals) state the requirement is too high, most stating that it should be 42,568 (the housing need of 40,541+ 5% buffer), to</p> <ul style="list-style-type: none"> • reduce environmental harm and climate change impacts; • reflect recent demographic changes; • protect the countryside and retain the character of Norfolk; • reflect issues over water supply and quality; • focus growth elsewhere in country where there are more regeneration needs and brownfield opportunities and better infrastructure, reducing the need for internal migration; • prioritise delivery of existing JCS allocations; • allow for flexibility in a time of uncertainty - the housing figures need to be reviewed against Covid-19 and Brexit impacts. <p>3. Many added there should be more use of windfalls in the numbers.</p> <p>4. The Government's continuance of the existing methodology confirms the housing need as 40,541 so there is no need to add 5,000 homes (no need to take account of 2018 projections or the direction of travel in Planning for the Future).</p> <p>5. CPRE and others variously argue that:</p> <ul style="list-style-type: none"> • housing need can be met through completions (2018 – 20), windfall and brownfield sites, so new greenfield allocations and policy 7.5 are not needed; • there should be phasing of delivery for any homes above housing need included following revisions to the standard methodology; • newly allocated sites should be phased to deliver after commitment; • there is no need for a contingency site. <p>5-year land supply</p> <p>1. The 5-year land supply should not be assessed against housing need, but rather against the total housing figure in the plan.</p> <p>2. The high housing targets in the JCS have led to developers winning appeals on unallocated greenfield sites on 5-year supply grounds so should not be repeated.</p> <p>Employment land</p> <p>1. Over-delivery of employment land as per allocations will lead to either a higher housing requirement or more in-commuting. If monitoring indicates either, review of the GNLP will be needed.</p> <p>2. Reassessment of undeveloped allocated employment sites should lead to undeliverable sites being replaced by alternative allocations, including rural brownfield sites.</p>
<p>Location of growth</p>	<p>Settlement Hierarchy</p> <p>1. Clarity is needed on the purpose of the hierarchy and how it has been used to inform the distribution of growth.</p> <p>2. Various respondents have stated that the hierarchy should be changed as, due to their level of services/existing populations:</p>

	<ul style="list-style-type: none"> • Wymondham should have its own separate classification as a “Large main town” (with more growth); • Mulbarton, Scole and Horsford should be Key Service Centres (KSCs) (with more growth). • Village clusters are based on a questionable approach using school catchments (and numbers should be reduced as the strategy has too great an element of dispersal); • The countryside should be identified in the settlement hierarchy enabling the growth of the rural economy. <p>Other comments</p> <p>Various other reps. (mainly from the development industry) have stated:</p> <ol style="list-style-type: none"> 1. In line with the existing strategic approach in the JCS, more growth should be focussed in and around the urban area; 2. Disproportionate levels of delivery proposed in the Norwich urban area will be challenging to deliver and allocations should be distributed more evenly across the hierarchy to ensure diversity, choice, competition and delivery; 3. More growth should be in Main Towns (Wymondham, Aylsham and Long Stratton are specifically identified) and KSCs to support rural economies and ensure delivery. These are even more integral to sustainability due to the current pandemic (home-working, reliance on local services, access to open space); 4. Housing numbers in village clusters should be reduced; 5. New settlements are needed in this plan to create sustainable, beautiful places with clean growth, including promoting strategic growth area/tech corridor. <p>Undeliverable existing/additional allocated homes, particularly on strategic sites, should be redistributed to the most sustainable and deliverable locations (e.g. Wymondham).</p> <p>Reps. from CPRE, parish and town councils, individuals and environmental/political groups, stated:</p> <ul style="list-style-type: none"> • More homes should be concentrated in Norwich using brownfield sites and by converting redundant retail and office space; • The village cluster housing numbers are too high due to lack of service provision and increased traffic generation leading to increased carbon emissions, with electric cars doing little to limit impacts. No further allocations beyond those from the JCS should be made in villages, with windfall policy 7.5 removed in favour of prioritising rural exemption sites for affordable housing; • A Green Belt on the Green Wedges model should be included to protect against urban sprawl; • ONS (2018) project that 95% of household increase in the plan period will be 1 or 2 person households so suburban housing estates are the wrong solution. <p>Aylsham - Reps. from the town council and others state that housing numbers in the town should be reduced with the removal of the site added between Regs. 18 and 19.</p>
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	Breckland DC have concerns over the focus of growth in the A11 Corridor, fearing implications for water and energy supplies and transport in the growth corridor in their district, the cumulative growth including both South Norfolk village cluster allocations and potential new settlements.
Green Infrastructure	Natural England state that the policy needs to be strengthened with regard to the delivery of green infrastructure with cross references to policy 3.
Non policy 1 issues raised A number of significant issues were raised under policy 1 which are of greater relevance to other plan policies plan	
Infrastructure	<ul style="list-style-type: none"> • The Norwich Western Link (NWL) A number of reps. stated that the NWL should not be promoted through the GNLP or transport plans, with the main focus of opposition on impact on the Wensum SAC and increased emissions. • A140 Omission of the upgrading of the A140 between Norwich and Ipswich and concentrating employment in the A11 corridor will not take advantage of growth generated by Freeport East at Felixstowe. • Infrastructure needs are referenced but not quantified, with no indications of where or how they will be provided.
Sustainability Appraisal	No evidence in the Reg. 19 SA that land allocation has been selected based on the least environmental value or of a hierarchy of sustainability compliance.
Sites	A number of proposed allocated and non-allocated sites were supported as they could implement policy 1.
Energy efficiency	Lobby central government to insist on carbon zero building standards. For much of the plan period, the highest standards will not be required. Whole Life Cycle assessments for housing construction (as per London) and elimination of fossil fuel heating are required to reduce emissions.

Policy 2 Sustainable Communities

Topic	Main Issues raised
Water Efficiency	<ol style="list-style-type: none"> 1. No justification for applying an unknown potential future government requirement; should be dealt with through a future local plan review 2. Will policies on water efficiency be sufficient to cope with the cumulative growth of both the GNLP and Breckland?
Climate Change/Energy	<ol style="list-style-type: none"> 1. No coherent climate adaptation policy; policy on climate change, energy etc is inadequate; does not reflect Government carbon emission targets; 2. Electric vehicles will put further pressure on the already constrained energy network; 3. Requirements for energy charging points cannot be in SPD; 4. Requirements for energy charging points have not been taken into account in viability; 5. Requirement for a 20% (or 19%) reduction against Part L of the 2013 Building Regulations is not supported by the evidence; 6. The Greater Norwich Energy Infrastructure Study did not consider neighbouring Breckland district's power needs for the growth already in progress at Attleborough and Snetterton Heath or at Dereham.
Landscape	Reference to strategic gap policies should be deleted.

Policy 3 Environmental Protection and Enhancement

Topic	Main Issues raised
Main issues raised of direct relevance	
The Built and Historic Environment	<ol style="list-style-type: none"> 1. Include more about the distinctive, unique heritage of the area to make the policy more locally specific; 2. Add reference (policy and text) to Historic Landscape Characterisation and Landscape Character Assessments; 3. Need for a historic environment topic paper, Heritage Impact Assessments of certain sites and also taller buildings evidence base.
The Natural Environment	<ol style="list-style-type: none"> 1. Natural England state that there are insufficient measures to ensure that adverse effects on European Sites from visitor pressure would be avoided (as GIRAMS is not adopted). Therefore, the plan is not in compliance with the Habitats Regulations; 2. Biodiversity net gain not included in viability – not demonstrated that allocations are deliverable; 3. To deliver biodiversity net gain off-site there must be a mechanism for developers to pay into a central pot that will be used to deliver biodiversity; 4. The need for GI to be met by development is not adequately defined; 5. The policy and supporting text are inadequate to protect, maintain, restore and enhance the natural environmental assets of the area; 6. Need to explain the hierarchies of site protection and mitigation.

Policy 4 Strategic Infrastructure

Topic	Main Issues raised
Transport	<ol style="list-style-type: none"> 1. Too much emphasis on traditional modes of transport and associated schemes, not enough detail on promoting walking, cycling and other forms of sustainable transport; 2. The policy does not go far enough in terms of reducing carbon emissions and tackling climate change; 3. Opposition to the possible construction of Norwich Western Link on the grounds of environmental damage; 4. Concerns that the lack of an up to date transport planning/evidence base (e.g. LTP4 is still in draft stage) means there is disconnect between sustainable transport and spatial growth planning.
Other Strategic Infrastructure	<ol style="list-style-type: none"> 1. Anglian Water has asked for minor modifications over some terminology; 2. No coverage of waste-water infrastructure, the Water Cycle study and the Water Framework Directive; 3. Norfolk Constabulary should be included within the strategic infrastructure element of policy 4, like health Infrastructure. There should also be a specific reference to a (forthcoming) Police Infrastructure Delivery Paper; 4. There is no detail on the delivery of strategic Green Infrastructure (GI); 5. There is no mechanism to secure education infrastructure.

General	<ol style="list-style-type: none"> 1. Agents have promoted specific sites that they believe to be suitable to support the vision and ambition set out in Policy 4; 2. Breckland District Council has concerns that the cumulative impact of growth identified in the plan could cause further strain on local power and water resources, waste management and transport infrastructure.
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Policy 5 Homes

Topic	Main Issues raised
Affordable Housing	<ol style="list-style-type: none"> 1. The 28% and 33% affordable housing policy, if achieved, would over-deliver against the identified need; 2. The reference to 'at least' 33% is ambiguous.
Viability Testing	Greenfield sites can face high development costs so viability testing should be allowed for at the planning application stage (as is allowed for brownfield sites).
Space Standards	There appears to be no robust evidence that would suggest that development below space standards is a concern in the GNLP area. The policy should provide flexibility to recognise need and viability, where necessary.
Accessible Housing	It will either be necessary to demonstrate a need for accessible housing or delete this part of the policy.
Specialist Housing	The need for 3,857 specialist retirement units in the plan area is based on evidence which is not currently publicly available. Even with the allocations proposed, there remains a significant unmet need for retirement homes and/or beds in residential institutions. Specialist housing for older people cannot be expected on mainstream housing sites and these should be addressed by specific allocations (see Inspector's report on the Vale of Aylesbury Local Plan Policy H6).
Purpose built Student Accommodation (PBSA)	PBSA should not be expected to contribute towards affordable housing provision. Paragraph 64(b) of the NPPF states that PBSA is exempt.
Self/Custom-Build	<ol style="list-style-type: none"> 1. The Councils need to consider the robustness of their self-build register as an evidence base and indicator for demand for self-build plots; 2. The Self/Custom-build has not been tested in viability appraisal work; 3. Objections to fixed percentage for serviced self-build plots on larger housing sites (best in windfall policy 7.5).

Policy 6 The Economy (including Retail)

General points	Main Issues raised
	<ol style="list-style-type: none">1. Most responses relate to the promotion of particular sites;2. There is a need for greater flexibility for the reuse/redevelopment of existing businesses;3. There is a need to allocate more land, including a large site, smaller sites and land for other types of employment generating uses;4. There is a need to ensure housing supports sustainable economic growth including town centres, the Cambridge Norwich Tech Corridor (CNTC) and the City Deal;5. The plan fails to capitalise on the opportunity to further support and direct employment growth to the CNTC;6. There are insufficient opportunities for economic development in rural areas;7. There is a need to allocate land to meet the needs of one particular business;8. There are concerns about the cumulative scale of growth, particularly in the CNTC, on Breckland;9. The policy does not provide the mechanisms to deliver jobs that fall outside the old B-class uses – the representation has been made in support of unallocated housing sites that include schools and care facilities.

Policy 7 Strategy for the Areas of Growth

Introduction

Topic	Main Issues raised
Process Issues	<ol style="list-style-type: none">1. Flawed site assessment process (many reps. suggest flaws with the assessment process or HELAA or SA);2. Lack of consultation about increase in numbers at Aylsham;3. Objection to separate South Norfolk Village Clusters Plan.

Policy 7.1 The Norwich Urban Area including the fringe parishes

Topic	Main Issues raised
General	<ol style="list-style-type: none">1. Historic England state that the GNLP should include a policy for taller buildings and the skyline (a recommended scope of a study is provided in the rep.);2. Amend so that all the figures for the allocations are identified as minimums;3. Smaller employment sites should be allocated in key locations to address the impact of housing growth;4. Breckland DC has expressed concerns over the impact of cumulative growth.

The City Centre	<p>Northern City Centre</p> <ol style="list-style-type: none"> 1. The agent for the developer of Anglia Square suggests a number of amendments to align policy GNLP0506 with emerging proposals. 2. Clarification is needed that the objective to preserve office accommodation, potentially via an Article 4 Direction, would not apply to Anglia Square, where redevelopment of redundant offices for homes is welcomed. 3. Historic England continues to have significant concerns regarding the approach to development at Anglia Square, including the lack of an HIA; 4. The Northern City Centre Strategic Regeneration Area has a lot of uncertainty and potential for delay re. the Anglia Square allocation. <p>Other elements of city centre policy</p> <ol style="list-style-type: none"> 1. Include protection of valued cultural facilities (para. 92 NPPF); 2. Policy 7.1 is restrictive and not in accordance with NPPF and the revised Use Class Order. Greater flexibility is essential to enable vibrancy and viability. In store retail is declining exacerbated by the pandemic; leisure uses should not be restricted to a defined leisure area. 3. Both support for and objection to the deletion of the bullet point regarding landmark buildings at gateways to the city centre.
East Norwich	<ol style="list-style-type: none"> 1. Historic England have concerns: <ul style="list-style-type: none"> • regarding the impact on Carrow Abbey /Carrow Priory. • over the capacity of the East Norwich sites - detailed HIA is required to inform the development/allocation potential of the sites; 2. The Broads Authority suggest some modifications re. navigation, mapping and the combined approach to the East Norwich sites; 3. The area is a long-term prospect with a high level of constraints and a history of non-delivery. Evidence does not suggest that the sites will come forward. 4. The area includes a County Wildlife Site. Clear policy is required to assess the acceptability of proposals that will affect it. 5. Covid-19 has changed home buyers' priorities (seek outdoor space + rural locations). Question whether demand exists for 4,000 dwellings in the area.
Elsewhere in the urban area	<ol style="list-style-type: none"> 1. Over reliance on the Growth Triangle for delivery within the plan period; 2. Thorpe St Andrew has no new allocations despite the availability of sites; 3. The parish of Honingham has been inappropriately classified as Urban Fringe in association with Easton (Honingham is a rural village).
Distribution and delivery of growth	<ol style="list-style-type: none"> 1. The GNLP is overly reliant upon sites in the Norwich Urban Area, risking market saturation and slow delivery rates. 2. Numerous allocations (75%) have been carried forward from previous local plans and have a track record of not delivering, with no promoter or developer on board. Some have a reliance upon public sector funding + public sector intervention to remedy market failure. 3. Historic England have concerns re. housing figures - Heritage Impact Assessments are required to test and inform the capacity of sites. 4. Insufficient account has been taken of the decrease in retailing in Norwich, which provides for significant redevelopment to housing. 5. Suggested solutions to 1 to 3 above include: <ul style="list-style-type: none"> • New settlement/s; • More rural development.

Contingency	<ol style="list-style-type: none"> 1. The contingency site at Costessey is likely to be ineffective due to constraints. Multiple contingency sites should have been identified in a variety of locations and the trigger mechanism should be earlier than three years. 2. There is already saturation of allocation sites in the Norwich Urban Area, the contingency site compounds the issue. Under delivery would be better addressed through a more robust evidence-based supply and monitoring.
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Policy 7.2 Main Towns

Topic	Main Issues raised
Aylsham	<ol style="list-style-type: none"> 1. Opposition from the Town Council and residents about both the site allocations and the process for their selection, focussing primarily on the addition of the Norwich Road site (GNLP0596R) being an increase of 83% in new homes from Reg.18 to Reg.19. Arguments against the allocation of 550 homes include: <ul style="list-style-type: none"> • Pressures on infrastructure – on schools, doctors, highways, parking, water supply and sewerage; • The lack of public consultation, and engagement with the Town Council, between Regulation 18C and Regulation 19 is criticised. • The GNLP should be withdrawn and re-consulted upon. 2. Support from a development promoter in Aylsham for the policy as written being consistent with para. 72 of the NPPF.
Diss (with part of Roydon)	<p>Site promoters state that:</p> <ol style="list-style-type: none"> 1. Allocations in Diss are disproportionately low compared to other Main Towns; 2. Housing allocations, including for older people's housing, should not be devolved to the Neighbourhood Plan; 3. The GNLP should have addressed perceived highways constraints, as opposed to using this matter to limit growth in a highly sustainable town.
Long Stratton	<p>Land promoters argue that the existing strategic allocation may not be deliverable and the GNLP should include a trigger for a review of allocations if the funding bid for the bypass is unsuccessful.</p>
Wymondham	<ol style="list-style-type: none"> 1. Support from the promoters of Silfield Garden Village (SGV) for the approach as drafted limiting piecemeal 'edge' growth. SGV would enable: <ul style="list-style-type: none"> • protection the strategic gap between Wymondham and Hethersett and • mitigating recreational pressure on the Lizard County Wildlife Site by the provision of a new Bays River Park. 2. Challenges from promoters of sites on the edge of the town include: <ul style="list-style-type: none"> • 'mixed messages' with contingency sites included in Reg. 18C; • the low level of growth is contrary to the town's inherent sustainability and location on the A11 Cambridge to Norwich Tech Corridor; • further growth would be supported by improvements to water capacity proposed by Anglia Water and improved access to the railway station; • 'rolling over' the existing strategic gap policy to Hethersett without a new assessment is unsound; • the development strategy for Wymondham effectively ends by 2030 on the basis that most AAP allocations will be completed by 2026, with approximately 500 dwellings to be delivered beyond that date.

Policy 7.3 Key Service Centres

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none">1. Developers and site promoters suggest the distribution through the settlement hierarchy and/or within KSCs is disproportionate and Brundall, Hethersett, Loddon, Poringland, Reepham and Wroxham should have further allocations;2. Policy 7.3 does not provide for educational or care/retirement housing needs in Hethersett or support provision of sports facilities;3. Policy 7.3 should refer to the GI strategy rather than GI maps reproduced in GNLP strategy document;4. Mulbarton, Horford and Scole should be redefined as KSCs.

Policy 7.4 Village Clusters

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none">1. There are a number of objections to the production of a separate South Norfolk Village Clusters plan. Concern about conflicting policies, an increase in excess of the minimum 1,200 homes not being in accordance with the NPPF. As the spread of development in SN not known, the overall environmental impact has not been assessed;2. Insufficient mention or consideration of self/custom build;3. Too much growth in village clusters/objection to dispersal;4. Too little growth in village clusters, some of the increase in numbers between Regs. 18C and 19 should have gone to villages;5. Appraisal of settlement boundaries should be undertaken;6. Policy does not allow for growth and expansion of rural businesses, impact of Covid-19 not adequately assessed, approach to employment overly restrictive;7. Policy fails to prioritise rural brownfield sites;8. Objection to the classification of Horsford as a village cluster rather than a KSC.

Policy 7.5 Small Scale Windfall Housing Development

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none">1. The policy is not clear on how it will operate in general and in relation to self-build;2. The policy is contrary to other policies and aims of the plan to promote sustainable development. It promotes development in unsustainable locations which are not well related to services and promote car use and carbon emissions;3. The split between parishes for 3 or 5 dwellings is too crude and has monitoring and implementation issues;4. The policy does not deliver affordable housing (larger allocations would);5. Sites adjacent to groups of dwellings without a settlement boundary are isolated dwellings in the countryside and therefore contrary to the NPPF;6. The policy should allow for higher levels of growth e.g. 3 or 5 per site not per parish, or sites up to 9;7. The "First past the post" approach is unworkable and is not sound;8. The policy does not support rural growth;

	9. Windfall and homes achieved from policy 7.5 should not be included in Table 6.
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Policy 7.6 – Preparing for New Settlements

Topic	Main Issues raised
Various Issues	<ol style="list-style-type: none"> 1. The policy pre-determines work that has yet to take place on the future distribution of growth; 2. There is no evidence that sustainable extensions to existing settlements have been exhausted; 3. Evidence from elsewhere demonstrates that new settlements struggle to provide affordable housing, particularly in their early stages; 4. There is a need for extensive evidence on viability, deliverability and infrastructure requirements; 5. There is a need for landscape character and heritage impact assessments (Historic England); 6. There is a lack of and need for consultation and engagement; 7. New settlements should be allocated now as they are more deliverable than some allocations.

Appendices

Topic	Main Issues raised
Appendix 1 - Infrastructure	<ol style="list-style-type: none"> 1. Sewage treatment in Aylsham - there should be a clearer plan to address capacity shortfall before any housing development; 2. There is a shortfall of provision in all aspects of health care; 3. Police infrastructure requirements (based on forthcoming evidence) should be included in Appendix 1, with a cross reference to Policy 4; 4. No infrastructure needs have been identified for Hingham, despite the cumulative impacts of development in the town.
Appendix 2 – Glossary	<ol style="list-style-type: none"> 1. Definitions for Listed Building, Local List and Registered Park and Gardens are required. 2. Change Scheduled Ancient Monument to Scheduled Monument.
Appendix 3 - Monitoring	<ol style="list-style-type: none"> 1. The plan is not carbon audited. It is not in line with the Climate Change Act (2008) as required by national policy and guidance; and is unsound in relation to the duties around mitigation; 2. The GNDP councils are significantly behind many leading authorities which have developed binding policies requiring new development to be net zero carbon, reducing carbon emissions in relation to retro-fitting buildings, energy generation and transport.
Appendix 6 – Housing Trajectory	<ol style="list-style-type: none"> 1. A site-by-site list showing the anticipated delivery of housing to evidence the trajectory is needed. 2. The divorcing of the village clusters plan from the GNLP means there is no evidence of the 1,200 homes expected from this part of the plan being deliverable.

2. The Sites

Introduction

- Lack of Heritage Impact Assessments. Insufficient information about the historic environment to support allocations, assessments don't follow Historic England methodology;
- Objections to separate South Norfolk Village Clusters plan.

Norwich

General Comments:

- Cllr Lesley Grahame and Green party representations suggest that: "Whole life cycle carbon analysis is necessary for new development to be sound and meet Climate Change Act legal target" for a number of sites within Norwich.

Policy CC2, 10-14 Ber Street:

- Historic England suggest key listed buildings affected by the development should be referenced. Policy wording should also reference 'Area of Main Archaeological Interest'

Policy CC4a, Rose Lane and Mountergate, land at Mountergate West:

- Anglian Water suggest additional policy criteria on existing surface water sewer on site.
- Cllr Lesley Grahame suggests that Rose Lane community garden should be a green space allocation. Employment welcome but must be compatible with high density residential.

Policy CC4b, Rose Lane and Mountergate, land at Mountergate East:

- The landowner's agent objects to the policy approach to the privately owned designated open space and the approach to landmark buildings. They also seek amendment to the uses on site to include a care home and remove educational facilities.
- Broads Authority request inclusion of early consultation with them in supporting text.

Policy CC7, King Street/Hobrough Lane includes 125-129 King Street and 131-133 King Street and Hoburgh Lane:

- Suggestion from landowner that policy should include criteria for viability appraisal at application stage due to difficult site constraints. Also requests acknowledgement of Norwich City Council's role in providing riverside access.
- Historic England require archaeological assessment to be included in policy criteria.
- Cllr Lesley Grahame suggests that the development must protect existing trees on site & provide proposed river access and walk.

Policy CC8, King Street, King Street Stores:

- Historic England suggest additional policy criteria requiring trial trenching prior to development.
- Policy intention to recreate historic streetscape should be replaced with priority to retrain the mature trees lining the boundary of the site (note that trees have TPOs).
- Cllr Lesley Grahame, Norwich Green Party and Historic England support retention of locally listed buildings on site.

Policy CC10, Land at Garden Street and Rouen Road:

- Policy criterion 1 & 2 are exactly the same, the repeated second point should be deleted.

Policy CC11, Argyle Street:

- Historic England suggest Archaeological Investigation requirement should be included in the policy criterion.

Policy CC15, Lower Clarence Road, car park:

- Policy should list nearby statutory listed buildings.
- Existing trees and hedges should be retained.
- Clause 2 is unclear regarding what is meant by 'built frontages'.

Policy CC16, Kerrison Road: Land adjoining Norwich City Football Club north and east of Geoffrey Watling Way:

- Site promoter does not support provision of a public transport interchange on site and a public transport strategy for the wider east Norwich strategic regeneration area, but would support wording change to: *"Facilitate potential for enhanced pedestrian and public transport access to the wider Norwich strategic regeneration area"*.
- Cllr Lesley Grahame would like to add 2 further points – re-opening of train halt at Trowse + provision of open amenity space.
- Clarification required relating to numbers as there are consents on this site.
- Policy relating to river frontage relates to elements that have now commenced on site.
- Broads Authority suggest early engagement with them is added to supporting text.
- Approach to car free/low car housing should be consistent throughout relevant allocation policies.

Policies CC17 a and CC17b, Land at Whitefriars, Barrack Street:

- Sites referenced CC17a and CC17b are not being carried forward under these boundaries/policies. They have been replaced with GNLPO409AR and GNLPO409BR. It is assumed that the representation made here relates to the new site references: *"This is acceptable and welcomed, subject to social housing, environmental standards and traffic neutrality that make the plan consistent with climate and planning legislation"*

Policy CC18 (CC19), Oak Street and Sussex Street:

- Historic England suggest reference to the Area of Main Archaeological Interest and requirement to produce an archaeological assessment are included in policy criterion.

Policy CC24, Bethel Street, land rear of City Hall:

- Historic England suggest reference to the Area of Main Archaeological Interest.

Policy CC30, Westwick Street car park:

- Historic England - need for a policy requirement for archaeological assessment.

Policy R1, The Neatmarket, Hall Road:

- Promoting agent suggests greater flexibility of use classes in spirit of new class E; also, that wording relating to junction improvements should revert to that in existing policy.

Policy R13, Gas Hill, Site of former Gas Holder:

- Norwich Green Party and Cllr Lesley Grahame advocate retaining this site as woodland for biodiversity and climate objectives given the acknowledged constraints of the site.

Policy R17, Dibden Road, Van Dal Shoes and car park:

- The site promoter objects to the criterion relating to retention/reuse of existing buildings. Wording requiring '*high quality, locally distinctive design*' repeats requirements of strategic policies & places undue emphasis on this site which is misleading.

Policy GNLP0068, Duke Street, land adjoining Premier Inn and River Wensum:

- Historic England suggest inclusion of reference to Area of Main Archaeological Interest.

Policy GNLP0133BR, Land adjoining the Enterprise Centre Earlham Hall (walled garden and nursery):

- Historic England suggest a Heritage Impact Assessment is required for the whole campus.

Policy GNLP0133C, Bluebell Road (UEA, land north of Cow Drive):

- Anglian Water - existing water mains on site, suggest inclusion in policy.

Policy GNLP0133DR, Land between Suffolk Walk and Bluebell Road:

- Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities.

- Historic England suggest a Heritage Impact Assessment (HIA) is required for whole campus.
- Comprehensive objection from Yare Valley society – allocation is contrary to national and local policies, the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0133E, UEA Grounds Depot:

- Public objection to loss amenity open space and biodiversity. Impact on Yare Valley and wildlife. Impact of increased student numbers on local infrastructure and amenities. Suggest allocation removes building works in this area to protect green corridor of the Yare Valley.
- Support from Environment Agency as development is sited in Flood Zone 1 area of allocation site & is in accordance with SFRA & previous EA comments.
- Support from site promoter subject to suggested changes to be more flexible regarding scale and massing of allowed development & difficulty in achieving cycle & pedestrian connections to sites outside of their ownership.
- Comprehensive/substantial objection from Yare Valley society – allocation is contrary to national and local policies as well as inconsistent with strategic policies of the GNLP; the area is protected by the current local plan; Yare Valley is a priority Green Infrastructure project in the Greater Norwich Infrastructure Plan.

Policy GNLP0401, Duke Street, former EEB site (Dukes' Wharf):

- Minor typographical/wording suggestions from Broads Authority.
- Support from Environment Agency and Historic England.
- Additional criteria relating to existing water main suggested by Anglian Water.

Policy GNLP0409AR, Land at Whitefriars:

- Support from Environment Agency – ‘text does not acknowledge that the site is in future Flood Zone 3a but flood risk issues should be able to be addressed on a site specific basis’.
- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested revisions to/re-ordering of policy wording by Historic England. Suggest inclusion of reference to Area of Main Archaeological Interest. Suggest a Heritage Impact Assessment is required for this site.

Policy GNLP0409BR, Land at Barrack Street:

- Additional criteria relating to existing surface water sewer suggested by Anglian Water.
- Suggested minor revision to policy wording by Historic England. Suggest a Heritage Impact Assessment is required for this site.

- **Objection from Site promoter** - Mixed use requirement is not evidenced to be viable or deliverable, the allocation is inconsistent with strategic policies. The inconsistency of parking policies between local authority areas throughout the plan undermines the attractiveness of City sites for business/employment uses. Suggestion that the site boundary is not correct (*however, boundary is in accordance with site promoter's reg 18C representation*). Sustainability Appraisal is misleading as it refers to expired consents for this site. Site promoter has provided suggested alternative allocation policy wording.

Policy GNLP0451, Queens Road and Surrey Street, land east of Sentinel House:

- Objection from site promoter on behalf of developer – the site has extant consent for student accommodation due to commence on site summer 2021. The site allocation policy is considered unsound for three reasons: i) Unjustified and ineffective heritage requirements. ii) Unjustified and ineffective approach to affordable housing. iii) Unjustified and ineffective approach to landscaping and biodiversity. (Suggested revision to policy wording to make sound provided by agent)
- Minor alterations to wording and reference to the Area of Main Archaeological Interest into the policy suggested by Historic England.

Policy GNLP0506, Anglia Square:

- Agent on behalf of site developer – suggests that the site boundary should be extended to include the area underneath the flyover. A comprehensive suggestion for revised supporting text has been provided by the agent. The agent has also suggested a comprehensive review of the allocation policy wording.
- Additional criteria relating to existing water mains, foul and surface water sewers suggested by Anglian Water.
- Significant concerns raised by Historic England relating to scale height and density. Suggestion that the allocation figure should be reduced from the current 800 to 600. Aside from housing, the permissible extent of other development on site is unclear. A Heritage Impact Assessment (HIA) should be prepared for the site. Suggested reinstatement of historic street pattern and suggested wording revision provided to policy.
- Comprehensive objection from Norwich Green Party – consider the policy repeats the same elements which lead to a lack of public support for the rejected scheme. 800 homes should be a maximum and this figure should include any potential student accommodation. Objection raises issues relating to: existing artistic community, provision of multi-storey car park/carbon emissions, more ambitious energy efficient design, landmark building. Proposal should reflect medieval street pattern, reference green open space and high-quality landscaping; low car environment.

Policy GNLP1061R, Land north of Norwich International Airport, Imperial Park:

- Historic England suggest reference to nearby Horsham St Faith Conservation area and heritage assets is made within policy.
- Site promoter on behalf of site owner supports an allocation subject to changes to policy requirements. Site boundary to be extended to include land at Petans, policy needs to provide a mixture of aviation and non-aviation uses in line with endorsed airport masterplan (current policy wording is inconsistent and overly restrictive). Ancillary uses should also be allowed to make site more sustainable.

Policy GNLP2114, Muspole Street, St Georges Works:

- Objection from site promoter. 110 homes, 5,000 sqm offices/managed workspace and potentially other ancillary uses is not achievable. Revised wording suggested.

Policy GNLP3054, Duke Street, St Marys Works:

- Historic England suggest that a detailed HIA is prepared for this site. Minor amendment of policy wording and reference to the Area of Main Archaeological Interest into the policy suggested.
- Site promoter objection – number of homes should not be ‘minimum’ but ‘in the region or order of’. The requirement to justify the housing type against a local community need is not considered to be justified or consistent with national policy. Suggestion that policy is amended to allow full or part retention of the locally listed building. Suggested revision to policy wording provided in representation.

East Norwich Strategic Regeneration Area

- Protecting wildlife and heritage sites, and water storage for the event of flooding will be critical the success or otherwise of the project.
- Opportunity to provide pedestrian and cycle links to Whitlingham enabling reduced carbon emissions through sustainable modes of transport.
- Introduction of a road bridge to Yarmouth Road would change the quiet suburban character of Thorpe, add noise and pollution, reduce air quality. It would threaten marshland biodiversity and water storage capacity, and reduce the amenity of the river Wensum, thereby undermining the River Wensum Strategy and conservation areas.
- Resident consultation is vital in the design and development of this new site.
- Low car development would reduce harm. Energy efficiency standards should reflect the best aspirations.
- Suggest opening former rail halt at Trowse to serve ENSRA & County Hall + bus connections to UEA, NRP & N+N Hospital.
- Potential impact of ENSRA on Whitlingham Country Park should be mitigated by extending the country park to cater for increased demands.
- The area is prone to flooding and development will need to mitigate against this risk.
- Any energy generation should be from recognisably clean sources (not combustion).

- Policy map should show area of utilities site in the Broads Local Authority area (allocated in their adopted local plan)
- The functioning of existing Carrow Yacht Club should be protected in the policy.
- The presence of County Wildlife Site does not preclude development, and this should be made clear in the allocation policy.
- Environment Agency *"Whilst we are able to find this allocation sound, there is no mention of the need to preclude development on a large part of GNLP0360 due to being Flood Zone 3b, and there is no mention on the need to not increase flood risk elsewhere and therefore provide flood storage. There is lots of mention of 'flood resilient construction' when this tends to mean the buildings can recover from a flood, while we would require buildings to have raised floor levels to prevent them flooding in the first place. It is however possible that perhaps this is just differing terminology and the intention is the same as us. It is positive that the SFRA Site Summary Table includes lots of detail as to what is required to develop the site, so therefore this information should be covered here."*
- Historic England raise significant concern with the proposed number of dwellings allocated which may have a harmful impact on the historic environment (there are numerous heritage assets on this site). Strongly advise that a HIA is prepared for ENSRA sites. Some suggested amendment to wording has been provided by Historic England.
- Dentons suggests that the viability and therefore deliverability is not sufficiently evidenced. This should not be deferred to an SPD stage. The requirements of the ENSRA SPD have not been adequately established in policy 7.1 and site allocation GNLP0360/3053/R10. This relates to the scope, timing and scale of the masterplanning process and whether elements of it are Justified and will be Effective.
- Rosconn Group – No evidence that ENSRA will realistically yield this level of development in GNLP plan period. Significant Infrastructure requirements and flood risk indicates that site is more appropriate for long term than medium-long term. L2SFRA indicates areas of land in floodplain likely to affect amount of land available for development & mitigation needed. But no sequential test evidence is provided to demonstrate selection of these sites instead of sites elsewhere.

Norwich Site Assessment Booklet:

- Site GNLP0478 (Land east of Green Lane West) has not been allocated due to Highways related reasons – it is suggested that an engineered solution could be found & that the site should be allocated.
- Land allocated at Colney Hall is misleading to allocate the entire area as it contains historic parkland that should not be developed & which is outside of the development boundary.
- Cringleford Parish Council challenges the GNLP's Regulation 19 proposals for the Parish of Cringleford. The number of homes allocated does not respect the figure of 1,200 in the adopted Cringleford Neighbourhood Plan. The GNLP has ignored comments of the Parish made under Regulation 18 and is proposing a 32% increase

over planned residential dwellings without providing evidence of need for the additional housing in Cringleford. Challenge that the plan meets the criteria of compliance with duty to cooperate (disregard of neighbourhood plan & parish council comments to previous consultations).

- Historic England suggest site assessments appear to be lacking. The assessments do not follow the 5-step methodology set out in HE advice note 3. They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets and do not consider mitigation and enhancement. This is of particular concern for sites where additional HIA was recommended at reg 18 but has not been carried out. Concerns regarding the indicative capacity of a number of sites. HE considers that Norwich's historic character is under pressure. we consider that it is essential evidence base document is prepared outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City.

Urban Fringe

- **Historic England** - The changes made to Site Policies in view of comments made at Reg 18 are welcomed. Continue to advise that **Heritage Impact Assessments (HIAs)** should be prepared in advance of the EiP. This applies to Colney Hall GNLPO253 in particular.
- **Costessey** - COS3/GNLPSL2008 (Overwood Lane) changes to Settlement limit suggested.
- **KES2 employment site** has the capacity to deliver in the region of 30, 000 sq. meters of employment floorspace so expansion suggested.
- Further evidence of Housing Need is required to justify increase in numbers at **Cringleford** in relation to NP and site allocated with uplift.
- **Showground, Costessey** COS5/GNLPO274
 - amendments suggested to include small restaurants, café, PH, etc.
 - retail and leisure will add greatly to the over stretched local road network and contradicts Policy 2 of Neighbourhood Plan.
- The site at **Farmland Road, Costessey**, offers an appropriate opportunity to deliver growth in a manner that is appropriate.
- **Drayton Site DRA1** - Carried Forward Sites / Planning permissions / GNLPO Policy Requirements require update to reflect permissions.
- **Drayton – GNLPO290** (unallocated) Recommended changes to Policy 5 to enable viability of care homes, and Policy 3- as it does not specifically refer to CWS - proposed amended text to set out a clear benefit a development can provide, such as a 10% biodiversity net gain.
- **Taverham site 0337R** should include Police Station Norfolk Constabulary / NPS (DTC)
- **Code Developments** – (Horsford) on behalf of Drayton Farms - The plan has failed to justify through proportionate and consistent evidence the selection of allocated site GNLPO337(Taverham), identified contingency site GNLPO2043/0581 and the rejection of Reasonable Alternative sites **GNLPO332R and GNLPO334R (Hellesdon**

north) as site assessment is not transparent. Legal opinion obtained. Additional medium sized site allocations should be identified in order to reduce the over-reliance of the plan's supply of housing on large-scale development sites. Site HEL4/GNLP1019 allocated for Open Space should be deleted and considered for housing under sites GNLP0332R and GNLP0334R instead.

- **Code Developments** – Hellesdon (on behalf of Jarrolds) – objects to Site Assessment and outcome of not allocating clients' Site GNLP2173 – for Housing. There are inconsistencies in Site Assessment and SA Report approach taken between HEL1 'carried fwd sites' and 'new sites' GNLP2173.
- **Easton PC** – DTC – Easton EAS 1: - objection to the additional 90 dwellings on the last parcel of allocated land, to the east of Easton Gymnastics Club.
- **Lanpro** – Rackheath – GNLP2166 should be allocated for 200 dwellings as unlikely to impact to Rackheath Hall unlike GNLP0132
- **La Ronde Wright** - Sprowston – New site promoted - west of Blue Boar Lane near garden centre - unallocated in the GT AAP
- **Bidwells** Sprowston - GNLP0132 – Request flexibility on affordable housing requirement due to infrastructure requirements for High School and additional requirements by AW for pumping station to serve the surrounding area.
- **Sprowston** - Request that GNLP3024 is allocated for mix and community uses to complement nearby housing developments.
- **Norfolk Wildlife Trust** – Sprowston - recommended text modification to site GNLP0132 adjacent to Ancient Woodland -GI requirement
- The **SFRAs** done are defective as maps have not been followed through properly. With regards to the NEG, massive development has been approved within a massive flood plain that is close to sea level and where tidal effects are observable for miles.
- **Broads Authority**- recommended text for clarity for Policy 3 with respects to the built and historic environment. heritage impact assessment is required by government guidance for any application that affects any heritage asset or their setting.

Main Towns

Aylsham

- Substantial objections from 65 residents, as well as Aylsham Town Council, concentrating on the addition of GNLP0596R, and the increase in housing requirement to 550 new dwellings, without further consultation prior to progressing to the Regulation 19 stage. The soundness of the GNLP is challenged, in respect to its evidence and justification for the housing allocated. Issues include the demand on infrastructure such as highways and education provision, and sewerage capacity.
- An objection from the promoters of site GNLP0336 west of A140 argues for the inclusion of their site - the assessment process failed to take account of a variation of their proposal that would provide 150 homes instead of 300 homes.

- In relation to GNLP0596R on Norwich Road the promoter has reiterated their support for the site's allocation, whilst clarifying that the policy should be amended to exclude pedestrian connections via Copeman Road. Historic England raises the potential impact on the nearby Grade II Diggins Farmhouse. A minor modification put forward by Anglian Water is to amend the policy wording to allow for access to maintain the foul drainage infrastructure running through the site.
- In relation to GNLP0311/0595/2060 on Burgh Road the promoter has reiterated their support for the allocation, whilst suggesting minor modifications to reduce the carriageway width, and to clarify that their obligation is to provide land for the school (and not the school itself). A minor modification is put forward by Anglian Water to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the site.

Diss

- Objections from promoters that focus upon the strategic growth figure for Diss, and the devolution of site allocations to the Neighbourhood Plan. Sites in question include: DIS1, DIS3, GNLP0250/0342/0291, GNLP0599, GNLP1044, and GNLP1045.
- Diss Town Council state that a footway/cycleway is required as part of GNLP01022 (Frontier Site) northwards towards to join Frenze Hall Lane.

Harleston

- Minor modifications are put forward by Anglian Water to allocation policies GNLP2108, GNLP2136, HAR 4, HAR 5, and HAR 6 to safeguard access for the maintenance of the water supply, foul and surface water drainage infrastructure that runs through the sites.
- A development promoter wishes to see the settlement boundary to the south of Harleston redrawn around GNLP2109 and GNLP2136.

Hethel (Strategic Employment Area)

- The settlement boundary should be updated, reflecting changes such as the development of the Classic Team Lotus building.
- Norfolk Wildlife Trust states that policies should specifically address potential impacts on the County Wildlife Site and ancient woodland from impacts including encroachment and light pollution.
- Historic England state that policies should mention the impacts on nearby Grade II listed Little Potash/Brunel House and Corporation Farmhouse.
- Promoters on behalf of Goff Petroleum object to the non-allocation of their site for a new energy research centre (site reference GNLP0116R).

Long Stratton

- The strategic approach to Long Stratton should be changed, with promoters arguing for inclusion of their site GNLP0354, GNLP4033, and GNLP4034.

Wymondham

- The strategic approach to Wymondham should be changed, with promoters arguing for inclusion of their sites GNLP006 (north Wymondham) and GNLP0320 (south of Gonville Hall Farm).

- A generic comment from the Environment Agency for all Wymondham site allocations states that the latest version of the Water Cycle Study shows that Wymondham Water Recycling Centre will be over capacity post growth. The latest findings and recommendations from the WCS should be incorporated and reflected in the Local Plans and Site Allocations.

Key Service Centres

- Broads Authority would like dark skies consideration inserted into Acle site policy;
- Acle site promoter wants additional policy requirement for phasing plan for road;
- In Acle, Brundall, Hethersett, Hingham, Loddon, Anglian Water requests additional policy and supporting text elements in some sites with underlying water assets;
- Developers and site promoters suggest sites in Blofield should be allocated/included in settlement boundary;
- Pigeon proposed a school on GNLP0352 in Brundall, but this use was not assessed;
- Brundall BRU2 Unsound to allocate for open space as housing permitted and development has commenced;
- Page 40 of Hethersett site assessment booklet contains an error in that the site descriptions have been set under the wrong heading;
- Site GNLP0503 in Hingham has been withdrawn during Reg19;
- GNLP0520 Hingham Site policy for surface water only deals with site, not lower surrounding areas;
- Chedgrave PC considers duty to co-operate has been failed, entire process has been inadequate re involvement of public.
- Richard Bacon: Plan does little to address education needs in Poringland. NCC has need and funding allocation for primary school in Poringland, plan should address this.
- Reepham GNLP0353R in 2019 use changed to include employment land 1.6ha (as well as housing and potential expansion of GP). Part 1 booklet neglects to mention employment. Rep has not been taken into account when selecting sites contrary to reg 18(3) which requires all reps taken into account. Reg18C rep repeated employment, and submitted access strategy. Highways view unchanged. (NB site booklet did not include employment in table stage 1 (part 3, post-reg18c) but correct description in stage 4.)
- Reepham REP1 allocation is not deliverable, as evidenced by application 20200847, viability information of which shows 141 homes, only 20% affordable housing, and sports hall on alternative site (stated by developer).
- Unsound not to allocate housing in Poringland, partly due to dispersal strategy. Commitment has reduced as housing has been delivered in the village. GNLP0494R is suitable, available, deliverable. Site access given as constraint, but access was not disputed by Highways Authority in recent application 2017/2871. For GNLP0485R, **failed to consider school and country park while pressing need for school in Poringland and GI in Greater Norwich**. Highways Authority have not considered evidence submitted during Reg18C.

- Hingham booklet: contradictions in site assessments, decisions on some sites are flawed, not based on proportionate evidence. Highway Authority evidence is disputed, mitigation afforded to allocated sites could be applied to other sites. No reference to town centre. Conclusion in booklet justifies predetermined decision to allocate 0520.

Broadland Village Clusters

- Anglian Water objections regarding assets within the boundary of allocated sites, requesting new text and policy requirement (BLO5, 0297, FOU2, 0264, HNF1, 0188);
- Foulsham – significant opposition focussing on issues of historic hedgerow and access;
- Horsford – recent flooding being investigated by NCC;
- Horsham St Faith – increase in numbers without consultation, Historic England objection – request for HIA;
- Lingwood – introduction of 4016 without consultation;
- Marsham – alternative site 3035, Historic England objection – request for HIA;
- Lack of allocation in Great and Little Plumstead cluster;
- Reedham – lack of consistency – no safe route to school;
- South Walsham – potential change of access point.

Non-Residential

- Policy BKE3 -- Brooke Industrial Estate – Norfolk Wildlife Trust request policy update to include an ecological assessment to reflect proximity to Atlas Gravel Workings CWS.
- **Review of strategic gaps** required. The promoter of GNL0177-BR has completed an initial assessment for the Hethersett- Cringleford strategic gap. They argue that development can be accommodated without resulting in coalescence between the two settlements.

Costessey Contingency Site

- **Historic England** – A Heritage Impact Assessment be undertaken.
- **Code Developments** – Additional contingency sites should be identified.
- **Barton Wilmore** – As the site can deliver educational land at the beginning of the period it should be a full allocation. Revisions to site policy include 977 dwellings @35 dph.
- **Client Earth** - Site could contribute towards the urbanisation of countryside.
- **Various sites** suggested for allocation instead of having a contingency site.

3. Evidence Studies

Equalities Impact Assessment

- Highway safety concerns (Raised by Hingham Town Council – specific to Hingham)

Green Infrastructure Study

- Hingham Conservation area is out of date, the boundary was revised in 2016. Need to know if any other boundaries used are out of date.

Gypsy and Travellers

- The Gypsy/Traveller Accommodation Assessment is flawed, failing to take proper account of need and supply;
- Accusations of improprieties in planning overall leading to extensive breaches of Human Rights and Equalities legislation.

Habitat Regulations Assessment (HRA)

- Not legally compliant – HRA incomplete.
- Not sound – inadequate evidence to demonstrate that no adverse effects on European Sites (incomplete HRA) (both Norfolk Wildlife Trust).

HELAA

- Incorrect HELAA assessment of sites at Coltishall and Silfield Garden Village

Statement of Consultation

- Lack of Reg 18d consultation for people to have their say
- SNC SCI not complied with and consultation not on the 'Have your Say' page of the SNC website

Strategic Flood Risk Assessment

- Fundamental concern with the production and use of FRAs and SFRAs for development sites – not just locally, but nationally;
- A single map linking the all groundwater flood susceptibility areas in GNLP and one for Surface Water flood areas would give a holistic picture for these matters in the GNLP area;
- It is surprising that maps showing the extent of major floods have not been produced;

- It would be informative if planners published information on the number and location of flooded properties in their area in the last 50 years and the dates when these properties were built;
- Allocation of site on land north of Tutttles Lane East, Wymondham (currently unallocated) is suggested would alleviate flood issues related to the river Tiffey.

Sustainability Appraisal

- Spatial strategy is not justified – other reasonable alternatives have not been properly appraised;
- SA is flawed in its assessment of specific sites and consideration of alternatives (inc strategic alternatives e.g. Hethersett / Cringleford, Silfield Garden Village proposal, Long Stratton);
- SA findings support a different approach to site allocation – avoiding as far as possible new development on greenfield land and in unsustainable locations (e.g. KSCs and villages);
- Contingency sites not justified (based on size and not speed of delivery);
- Carried forward allocations have not been treated comparably with other sites (no evidence or proper assessment);
- SA is inadequate in terms of carbon assessment and addressing climate change.

Viability Study

- Benchmark Land Value (BLV) -- £100,000/acre is not justified. The £348,000/acre adopted in the 2017 Hamson CIL is fully supported by a respondent.
- Typology 11 (strategic sites) – the gross to net areas assumption is unrealistic. To achieve 88% net to gross site area on a Typology 11 development is not practical or feasible in reality.
- Revenue Assumptions are not sound – concern exists that the private sale revenues assessed in the Viability Appraisal remains excessive. Using the housebuilder's actual sale prices (all of which are publicly accessible on Land Registry), the range of values recorded was £1,866/m² to £3,634/m².
- Developer Profit on Gross Development Value (GDV)– the reduction from 20% to 17.5%. The reduction in developer profit is un-justified.
- Build costs for apartments –the appropriate BCIS rate should be applied.
- The Viability Appraisal does not include a typology to fit the East Norwich Strategic Regeneration Area and specific viability appraisals for strategic sites are not provided.
- Sales-values, build costs and benchmark land values are too generic and not backed up by comparable evidence.

Water Cycle Study

Summary of main issues raised:

- Not legally compliant – WCS incomplete and so insufficient evidence to meet Habitat Regulations
- Not sound – WCS incomplete so insufficient evidence on water quality to show no impacts on SACs (both Norfolk Wildlife Trust).



Committee Name: Council

Committee Date: 21/07/2021

**Report Title: Members Code of Conduct and Complaints Hearing
Procedure July 2021 - Update**

Portfolio:	Cllr Kendrick, cabinet member for resources
Report from:	Executive director of corporate and commercial services
Wards:	All wards
OPEN PUBLIC ITEM	

Purpose

To consider revising the Member Code of Conduct in light of the LGA Model Code of Conduct and the findings of the Committee for Standards in Public Life.

Recommendation:

To adopt the revisions to the Member Code of Conduct in Appendix B and the complaints, investigation and hearings procedure set out in Appendix C, as recommended by the Standards Committee, for inclusion in the Constitution.

Policy Framework

The Council has three corporate priorities, which are:

- People living well
- Great neighbourhoods, housing and environment
- Inclusive economy

This report meets all corporate priorities

Report Details

1. Every local authority is required to adopt a Code of Conduct in relation to the conduct of its elected members. The council's current code of conduct is contained within the constitution and has served members well since it was

introduced in 2012. It is one with which members are familiar and overwhelmingly comply.

2. The Committee on Standards in Public Life (CSPL) undertook a comprehensive review of local government ethical standards and published a report in January 2019. It made 26 formal recommendations to the Prime Minister and 15 Best Practice recommendations. A number of the recommendations required legislative changes to be implemented but this has been delayed. These recommendations are set out in full in Appendix A and show how the council has or will be responding to them.
3. In the meantime, the LGA published a draft Model Code, which the Standards Committee considered at its meeting on 17 November 2020. Feedback from members and the Independent Person at that time was generally positive and welcoming of the Model Code. The final Model Councillor Code of Conduct was published on 23 December 2020, following consultation with stakeholders and examining good practice in local government and other professions. However, if the Government chooses to implement some of the recommendations arising from the CSPL, the LGA has expressed caution that the Model Code could require amendment and is keeping the situation under review.
4. On 5 July 2021, the Standards Committee considered the options regarding the adoption of the Code and voted unanimously to recommend to the Council to retain the current Member Code of Conduct as contained in the constitution as adapted to reflect the CSPL recommendations. The consideration being that this ensures that the Code of Conduct for Norwich City Council is fit for purpose, provides clarity on expected behaviours and manages and reflects public expectations.
5. Dependent on the development of the LGA Code, this may be considered by the Standards Committee at a future date.

Consultation

6. Group leaders have been consulted and their feedback is included in the appendices as attached.

Implications

Financial and Resources

Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2019-22 and Budget.

7. There are no proposals in this report that would reduce or increase resources.

Legal

Statutory Considerations

Consideration:	Details of any implications and proposed measures to address:
Equality and Diversity	Neutral impact
Health, Social and Economic Impact	Neutral impact
Crime and Disorder	Neutral impact
Children and Adults Safeguarding	Neutral impact
Environmental Impact	Neutral impact

Risk Management

Risk	Consequence	Controls Required
Include operational, financial, compliance, security, legal, political or reputational risks to the council	No risk	Not applicable

Other Options Considered

8. The Council may:
- a) Adopt the Code as set out at appendix B
 - b) Reject the Code as set out at appendix B and ask the standards Committee to reconsider the LGA Model Code

Reasons for the decision/recommendation

9. Each local authority must adopt a Code of Conduct in relation to the conduct of its elected members.

Tracking Information

Governance Check	Name	Date Considered
Relevant Executive Director	Annabel Scholes	12/07/21
Legal opinion	Katrina Hulatt	09/07/21
Chief Finance Officer (or Deputy)	Annabel Scholes	12/07/21
Monitoring Officer (or Deputy)	Katrina Hulatt	09/07/21

Appendices:

Appendix A CSPL Local Government Ethical Standards – 15 Best Practice Recommendations

Appendix B – Member Code of Conduct

Contact Officer:

Name: Kat Hulatt

Telephone number:

Email address: Katrina.hulatt@norfolk.gov.uk

APPENDIX A

CSPL Local Government Ethical Standards 15 Best Practice Recommendations

1: Local authorities should include prohibitions on bullying and harassment in codes of conduct. These should include a definition of bullying and harassment, supplemented with a list of examples of the sort of behaviour covered by such a definition.

Progress: The council's Member Code of Conduct has been revised at Appendix B to contain a prohibition on bullying and harassment.

2: Councils should include provisions in their code of conduct requiring councillors to comply with any formal standards investigation, and prohibiting trivial or malicious allegations by councillors.

Progress: The council's Member Code of Conduct has been revised at Appendix B to contain provision for these.

3: Principal authorities should review their code of conduct each year and regularly seek, where possible, the views of the public, community organisations and neighbouring authorities.

Progress: We will ensure that the council programme of meetings is updated to include an annual review of the Code of Conduct. We will consider the proposal regarding consultation at the Standards Committee and then with all Group Leaders to determine how the Council wishes to take this forward.

4: An authority's code should be readily accessible to both councillors and the public, in a prominent position on a council's website and available in council premises.

Progress: The Code forms part of the council's constitution. It is available on the council's website and in hard copy on request.

5: Local authorities should update their gifts and hospitality register at least once per quarter, and publish it in an accessible format, such as CSV.

Progress: The council will ensure that the gifts and hospitality register is updated on a quarterly basis as suggested.

6: Councils should publish a clear and straightforward public interest test against which allegations are filtered.

Progress: The revised constitution contains a straightforward public interest test.

7: Local authorities should have access to at least two Independent Persons.

Progress: We currently only have one Independent Person (Linda Barber).

We will start the recruitment process for another Independent Person, or persons, in June 2021.

8: An Independent Person should be consulted as to whether to undertake a formal investigation on an allegation, and should be given the option to review and comment on allegations which the responsible officer is minded to dismiss as being without merit, vexatious, or trivial.

Progress: The Council always consults an Independent Person as described, and the revised criteria that the Council applies in relation to complaints, investigations and hearings includes this – see Appendix C.

9: Where a local authority makes a decision on an allegation of misconduct following a formal investigation, a decision notice should be published as soon as possible on its website, including a brief statement of facts, the provisions of the code engaged by the allegations, the view of the Independent Person, the reasoning of the decision-maker, and any sanction applied.

Progress: The revised criteria that the Council applies in relation to complaints, investigations and hearings includes this – see Appendix C.

10: A local authority should have straightforward and accessible guidance on its website on how to make a complaint under the code of conduct, the process for handling complaints, and estimated timescales for investigations and outcomes.

Progress: The revised criteria that the Council applies in relation to complaints, investigations and hearings (see Appendix C) will be published on the council's website.

11: Formal standards complaints about the conduct of a parish councillor towards a clerk should be made by the chair or by the parish council as a whole, rather than the clerk in all but exceptional circumstances.

Progress: Not applicable to this council.

12: Monitoring Officers' roles should include providing advice, support and management of investigations and adjudications on alleged breaches to parish councils within the remit of the principal authority. They should be provided with adequate training, corporate support and resources to undertake this work.

Progress: Not applicable to this council.

13: A local authority should have procedures in place to address any conflicts of interest when undertaking a standards investigation. Possible steps should include asking the Monitoring Officer from a different authority to undertake the investigation.

Progress: We would always consider conflicts of interest at the outset and the revised criteria that the Council applies in relation to complaints, investigations and hearings includes this – see Appendix C.

14: Councils should report on separate bodies they have set up or which they

own as part of their annual governance statement, and give a full picture of their relationship with those bodies. Separate bodies created by local authorities should abide by the Nolan principle of openness, and publish their board agendas and minutes and annual reports in an accessible place.

Progress: Agendas and minutes of the boards are not currently published as these are not public meetings. The business plans are taken to cabinet annually.

15: Senior officers should meet regularly with political group leaders or group whips to discuss standards issues.

Progress: Senior officers meet regularly with political group leaders and standards issues are sometimes discussed. These could be added as standing items to the agendas of such meetings.

APPENDIX B

MEMBER CODE OF CONDUCT

INTRODUCTION

1. This code of conduct is made under section 27(2) of the Localism Act 2011 ("the Act") and applies to all members of Norwich City Council ("the council").
2. The purpose of this code is to promote and maintain high standards of conduct by members and co-opted members of the council when they are acting in that capacity.
3. This code is intended to promote and maintain behaviour consistent with the following principles:

SELFLESSNESS: Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

INTEGRITY: Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

OBJECTIVITY: In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

ACCOUNTABILITY: Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

OPENNESS: Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

HONESTY: Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

LEADERSHIP: Holders of public office should promote and support these principles by leadership and example.

4. You must register and declare interests as required by the Act.

GENERAL PROVISIONS

Introduction and interpretation

5. This code applies to you as a member¹ of the council.
6. You should read this code together with the general principles contained in the Act.
7. It is your responsibility to:
 - (a) comply with the provisions of this code
 - (b) undertake Code of Conduct training provided by the council
 - (c) co-operate with any Code of Conduct investigation and/or determination
 - (d) not intimidate or attempt to intimidate any person who is likely to be involved with the administration of any investigation or proceedings
 - (e) comply with any sanction imposed following a finding that I have breached the Code of Conduct
 - (f) not to make trivial or malicious allegations under this Code
8. In this code - "meeting" means any meeting of:
 - (a) the authority
 - (b) the executive of the authority
 - (c) any of the authority's or its cabinet's committees, sub-committees or joint committees²

¹ **"member"** includes a co-opted member and an appointed member. **"co-opted member"** means a person who is not a member of the authority but who: (a) is a member of any committee or sub-committee of the authority, or (b) is a member of, and represents the authority on, any joint committee or joint sub-committee of the authority, and who is entitled to vote on any question that falls to be decided at any meeting of that committee or sub-committee.

² Reference to a joint committee is a reference to a joint committee on which the authority is represented.

Scope

9. Subject to paragraphs 10 to 13, you must comply with this code whenever you:

- (a) conduct the business of the council (which, in this code, includes the business of the office to which you are elected or appointed); or,
- (b) act, claim to act or give the impression you are acting as a representative of the council;

and references to your official capacity are construed accordingly.

10. Subject to paragraphs 11 and 12, this code does not have effect in relation to your conduct other than where it is in your official capacity.

11. Conduct to which this code applies (whether that is conduct in your official capacity or conduct mentioned in paragraph 11) includes a criminal offence for which you are convicted (including an offence you committed before the date you took office, but for which you are convicted after that date).

12. Where you act as a representative of the council:

- (a) on another relevant authority, you must, when acting for that other authority, comply with that other authority's code of conduct; or
- (b) on any other body, you must, when acting for that other body, comply with the council's code of conduct, except and insofar as it conflicts with any other lawful obligations to which that other body may be subject.

General obligations

13. You must treat others with respect.

14. You must not:

- (a) do anything which may cause the council to be in breach of any statutory obligations, including discriminating unlawfully against any person. Unlawful discrimination is where someone is treated unfairly because of a protected characteristic. Protected characteristics are specific aspects of a person's identity defined by the Equality Act 2010. They are age, disability, gender reassignment, marriage and civil partnership,

pregnancy and maternity, race, religion or belief, sex and sexual orientation;

- (b) do anything which compromises or is likely to compromise the impartiality of those who work for, or on behalf of, the council.
- (c) Bully or harass any person. The Advisory, Conciliation and Arbitration Service (ACAS) characterises bullying as offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient. Bullying might be a regular pattern of behaviour or a one-off incident, happen face-to-face, on social media, in emails or phone calls, happen in the workplace or at work social events and may not always be obvious or noticed by others. The Protection from Harassment Act 1997 defines harassment as conduct that causes alarm or distress or puts people in fear of violence and must involve such conduct on at least two occasions. It can include repeated attempts to impose unwanted communications and contact upon a person in a manner that could be expected to cause distress or fear in any reasonable person.

15. You must not:

- (a) Disclose information given to you in confidence by anyone, or information acquired by you which you believe, or ought reasonably to be aware, is of a confidential nature, except where:
 - (i) you have the consent of a person authorised to give it;
 - (ii) you are required by law to do so;
 - (iii) the disclosure is made to a third party for the purpose of obtaining professional advice provided that the third party agrees not to disclose the information to any other person; or;
 - (iv) the disclosure is:
 - (aa) reasonable and in the public interest; and,
 - (bb) made in good faith and in compliance with the reasonable requirements of the authority; or,
- (b) Prevent another person from gaining access to information to which that person is entitled by law.

16. You must not conduct yourself in a manner which could reasonably

be regarded as bringing your office or authority into disrepute.

17. You:

- (a) Must not use or attempt to use your position as a member improperly to confer on or secure for yourself or any other person, an advantage or disadvantage; and,
- (b) Must, when using or authorising the use by others of the resources of the council:
 - (i) act in accordance with the council's reasonable requirements;
 - (ii) ensure that such resources are not used improperly for political purposes (including party political purposes);and
- (c) Must have regard to any applicable Code of Practice for Local Authority Publicity made under the Local Government Act 1986.

18. When reaching decisions on any matter you must have regard to any relevant advice provided to you by:

- (a) The council's Chief Finance Officer; or
- (b) The council's Monitoring Officer, where that officer is acting pursuant to their statutory duties.

19. You must give reasons for all decisions in accordance with any statutory requirements and any reasonable additional requirements imposed by the council.

20. Under the provisions of the Localism Act 2011 and The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, you must give the Monitoring Officer written notice of any pecuniary or other interests and any changes, which apply to you or where it is an interest of your spouse or partner (a person with whom you are living as a husband and wife; or a person with whom you are living with as if you are civil partners) within 28 days of:

- (a) Election or appointment to office (if that is later);
- (b) Any change to the interests;
- (c) Disclosing an interest at a meeting (where not otherwise entered on the register);
- (d) Becoming aware of the interest when solely discharging a function of the authority as a member of the council's cabinet.

21. It is a prosecutable offence to fail to notify the Monitoring Officer of your interests or knowingly/recklessly provide false or misleading information.
22. The pecuniary interests which are specified for these purposes in the Act are:
- (a) Employment, office, trade, profession or vocation that you or your spouse/partner undertake for profit, remuneration or other gain;
 - (b) Sponsorship: any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in relation to any expenses you have incurred in carrying out your duties as a member, or towards your election expenses. This includes any payment of financial benefit from a trade union.
 - (c) Any contract which is made between you or your spouse/partner or a body in which you (or your spouse/partner) has a beneficial interest) and the relevant authority:
 - (i) under which goods or services are to be provided or works are to be executed; and,
 - (ii) which has not been fully discharged;
 - (d) Land: Any beneficial interest in land that you or your spouse/partner might have which is within the area of the relevant authority;
 - (e) Licences: Any licence (whether you alone, your spouse/partner's or held jointly with others) to occupy the land in the area of the relevant authority for a month or longer;
 - (f) Corporate tenancies: any tenancy where to your knowledge:
 - (i) the landlord is the relevant authority; and,
 - (ii) the tenant is a body in which the relevant person has a beneficial interest.
 - (g) Securities: any beneficial interest in securities of a body where that body to your knowledge has a place of business or land in the area of the relevant authority; and, either:
 - (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or
 - (ii) either the total nominal value or the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

23. You must also register other interests you may have which impact on your role within the council which include:
- (a) Membership of political parties; pressure groups; trade unions; charitable, voluntary or social enterprise organisations;
 - (b) Membership of another public sector organisation;
 - (c) Any other bodies not declared as a pecuniary interest in which you have a position of general control or management;
 - (d) Outside bodies to which you have been appointed by the council;
 - (e) Non-remunerated advice, guidance or consultancy you have provided on an ongoing basis, or specifically within a past 12 month period;
 - (f) Lobbying you have participated in, or Lobbying you have participated in, or matters you have been lobbied on (particularly where you may be predetermined on an individual matter);
 - (g) Organisations in which you have a beneficial interest which does not meet the requirements of 22 (g), (i) or (ii) above;
 - (h) Any other matters you consider should be disclosed;
 - (i) Pecuniary interests held by other members of your family or close associates which are likely to impact on your role as a councillor.
24. You may apply to the Monitoring Officer if you have a pecuniary interest which is sensitive and would cause you harm or victimisation as a result of the interest being made public. If the Monitoring Officer agrees the only notification that will be required is that you have a pecuniary interest and you will not need to disclose the details.
25. A member with a pecuniary or other interest in a matter, who attends a meeting of the authority at which the matter is considered, must disclose to that meeting the existence and nature of that interest at the commencement of that consideration, or when the interest becomes apparent.
26. You have a legal requirement to declare pecuniary interests at a meeting and must not take part in any discussion or vote on the matter.
27. If you are dealing with matters as a cabinet member and become aware of the interest, you must not take any further action in relation to it.

28. You may apply to the Monitoring Officer for a dispensation where you wish to participate in the consideration of an item and vote and you have a disclosable pecuniary interest where:
- (a) a committee may not be quorate without the dispensation being given;
 - (b) a disproportionate political representation on a committee may arise;
 - (c) it is in the public interest to give a dispensation;
 - (d) the cabinet could not make a decision without a dispensation;
 - (e) it is otherwise appropriate.
29. It is a prosecutable offence to continue to act where you have a disclosable pecuniary interest.
30. You will be required to withdraw from the meeting during the discussion of matters where you have a disclosable pecuniary interest. You have the same rights as a member of the public to speak at the meeting (i.e. you cannot vote or participate in the debate).
31. You must declare other interests, which impact on your role as a councillor, where it is relevant, but not prejudicial, to the matter under consideration. You may participate in discussion and the vote on the matter.
32. When participating in quasi judicial/regulatory decision making, you should also approach the matter with an open mind. If you appear to the public to have a closed mind on a matter you will be considered to have pre-determined the matter and therefore should not vote on the issue. If you have a pre-determined view in a matter under consideration, you will be required to withdraw from the room during the discussion and not participate in the discussion or vote.



Committee Name: Council

Committee Date: 20/07/2021

Report Title: Annual Report of the Audit Committee 2020-21

Committee chair	Councillor Price
Report from:	Executive director of corporate and commercial services
Wards:	All Wards
OPEN PUBLIC ITEM	

Purpose

This report presents the Annual Report of the Audit Committee 2020-21 appended at Appendix A to council.

Recommendation:

That council receives the Annual Report of the Audit Committee 2020-21.

Policy Framework

The Council has three corporate priorities, which are:

- People living well
- Great neighbourhoods, housing and environment
- Inclusive economy

This report meets the all the above corporate priorities

This report addresses a healthy organisation strategic action in the Corporate Plan

This report helps to meet requirement as set out in the terms of reference for the audit committee in the council's constitution.

This report helps to meet securing the council's finances objective of the COVID-19 Recovery Plan

Report Details

1. On 11 March 2014, the audit committee resolved to approve new procedures for the audit committee in line with Chartered Institute of Public Finance and Accountancy (CIPFA) guidance. The CIPFA guidance says that:

“The purpose of an audit committee is to provide to those charged with governance independent assurance on the adequacy of the risk management framework, the internal control environment and the integrity of the financial reporting and annual governance processes.”
2. The guidance goes on to set out that the core functions of the audit committee are to:
 - a) Be satisfied that the authority’s assurance statements, including the Annual Governance Statement, properly reflect the risk environment and any actions required to improve it, and demonstrate how governance supports the achievements of the authority’s objectives.
 - b) In relation to the authority’s internal audit functions:
 - i) oversee its independence, objectivity, performance and professionalism
 - ii) support the effectiveness of the internal audit process
 - iii) promote the effective use of internal audit within the assurance framework.
 - c) Consider the effectiveness of the authority’s risk management arrangements and the control environment. Review the risk profile of the organisation and assurances that action is being taken on risk-related issues, including partnerships with other organisations.
 - d) Monitor the effectiveness of the control environment, including arrangements for ensuring value for money and for managing the authority’s exposure to the risks of fraud and corruption.
 - e) Consider the reports and recommendations of external audit and inspection agencies and their implications for governance, risk management or control
3. The attached annual report of the audit committee 2020-21 was considered by members of the audit committee at their meeting on 13 July 2021.
4. The report sets out the work of the audit committee over the last financial year.

5. The report concludes that the committee has been effective in undertaking the functions set out in its terms of reference, in accordance with the council's procedure rules and the Accounts and Audit Regulations 2015.

Consultation

6. This report has been written in consultation with the chair and vice chair of the committee and based on discussions minuted at meetings of the committee. The report is subject to approval by the audit committee at its meeting on 13 July and comments from the committee will be reported to council on 20 July.

Implications

Financial and Resources

Any decision to reduce or increase resources or alternatively increase income must be made within the context of the council's stated priorities, as set out in its Corporate Plan 2019-22 and Budget.

7. There are no proposals in this report that would reduce or increase resources.

Legal

8. There are no legal implications arising from this report. The annual report of the committee is considered to be good practice and is reflected in the council's constitution.

Statutory Considerations

Consideration:	Details of any implications and proposed measures to address:
Equality and Diversity	No implications arising from this report
Health, Social and Economic Impact	No implications arising from this report
Crime and Disorder	No implications arising from this report
Children and Adults Safeguarding	No implications arising from this report
Environmental Impact	No implications arising from this report

Risk Management

Risk	Consequence	Controls Required
Include operational, financial, compliance, security, legal, political or reputational risks to the council	None	None

Other Options Considered

9. This report is for information and consolidates information set out in minutes to the audit committee held on 14 July 2020, 24 November 2020 and 9 March 2021.

Reasons for the decision/recommendation

10. To provide an annual report to council.

Tracking Information

Governance Check	Name	Date Considered
Relevant Executive Director	Hannah Simpson	09/07/21
Legal opinion	Katrina Hulatt	09/07/21
Chief Finance Officer (or Deputy)	Hannah Simpson	09/07/21
Monitoring Officer (or Deputy)	Katrina Hulatt	09/07/21

Background papers:

Minutes and reports to the audit committee meetings.

Appendices:

A Annual Report of the Audit Committee 2020-21

B Extract from the Council's Constitution – Audit committee terms of reference

Contact Officer:

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Annual Report of the Audit Committee 2020-21

Introduction

This is the annual report of the audit committee and advises the council of the work of the audit committee for the period of the civic year 2020-21.

Councillor Ben Price
Chair, audit committee

Councillor Keith Driver
Vice-chair, audit committee

Background

1. This report covers the work of the audit committee for the financial and civic year 2020-21. The production of an annual report by the committee is considered good practice.
2. The council established an audit committee in 2007. The terms of reference were considered and revised as part of the Constitution Review 2021. The committee exercises its powers, within the policy framework of the council and the corporate plan, as specified in the terms of reference.
3. The members of the audit committee in 2020-21 were:-

Councillor Ben Price (chair)
Councillor Keith Driver (vice chair)
Councillor Adam Giles
Councillor Laura McCartney-Gray
Councillor Martin Peek
Councillor Martin Schmierer
Councillor Ian Stutely
Councillor James Wright

Councillor Jane Sarmezey acted as a substitute member on the committee on at the audit committees held on 14 July 2020 and 24 November 2020.
4. Councillor Paul Kendrick, cabinet member for resources, attended all meetings of the committee.
5. The key officers who supported the audit committee were:

Annabel Scholes, executive director of corporate and commercial services (S151 officer) (chief finance officer)
Hannah Simpson, head of finance, audit and risk
Stephen Evans, chief executive officer
Gavin Jones, interim audit manager (to end of March 2021)
6. The engagement team of the external auditors (Ernst & Young LLP) is led by Mark Hodgson, with Mark Russell, who was covering for the council's external audit manager in 2020. Alison Riglar is currently the external audit manager for the council. The external auditors attend meetings of the audit committee to present their reports and answer members' questions.
7. The committee monitors the fees paid by the council to the external auditors to ensure value for money.
8. The committee met three times during the civic year 2020-2021 as follows:
 - 14 July 2020
 - 24 November 2020
 - 9 March 2021
9. The information contained in this report is drawn from the minutes and reports considered at committee meetings held during the year. Agendas, reports and minutes for the meetings are available on the council's website:

10. The committee requests training as required. Training is not restricted to committee members and there is an open invitation for all members of the council to attend. Training by an external facilitator was provided in October 2020 and focused on the member's roles on the audit committee. Five committee members and three other members of the council attended. Officers also gave a detailed presentation on the financial statements to members at an informal session on 23 November 2020, which helped members with their understanding of the accounts.
11. This report sets out the committee's performance in relation to the terms of reference and effectiveness of the committee in meeting its purpose, under the following headings:
 - (a) Corporate governance
 - (b) Internal and external audit
 - (c) Statement of accounts
 - (d) Referral powers and accountability arrangements

Corporate governance

12. There have been a number of changes implemented to improve the council's corporate governance and control environment this year.
13. The committee welcomes the changes that the corporate leadership team has made to strengthen governance arrangements within the council and in relation to its wholly owned companies. These include the development of a leadership programme to ensure the authority has the necessary skill sets, such as performance management, and establishing service review boards to oversee performance and review audit recommendations. This will improve the information available to report to the committee, particularly in relation to contract management. The council has also established a shareholders' panel to receive quarterly performance reports from the council's wholly owned companies, NCSL and NRL. The committee will review the effectiveness of these measures once these have been embedded throughout the organisation.
14. The committee is advised by the chief finance officer, internal and external audit. In line with CIPFA/SOLACE good practice, the council's constitution adopted in March 2021, has provision for the council to appoint up to two independent non-voting co-opted members to the audit committee whose "skill, knowledge, qualification and experience relevant to the role of the committee" to assist members.

Corporate risk management policy, strategy and register

15. The council's constitution adopted in March 2021, formalises the committee's request to receive a report on the council's risk management policy, strategy and register twice a year. This provides the committee assurance about the risk appetite of the council and an opportunity to ask questions on the application of scores to risks.

16. On 24 November 2020, the committee considered the risk management report prior to its consideration at cabinet on 16 December 2020. Members were advised of the governance arrangements that the chief executive officer and corporate leadership team (CLT) had implemented to ensure that risk management was a priority of the organisation. This included a thorough review of corporate risks and the monitoring of sets of risk registers within each directorate, quarterly meetings of a CLT risk assurance group, and consideration of risk management by the cabinet as part of a quarterly performance report. Testing for corporate ownership of risk and performance was an important part of the recruitment to the restructured senior management team (implemented in April 2021) and indicates the authority's commitment going forward. Members of the committee appreciated the format of the risk register which they considered was easy to understand.
17. Members were assured that the Covid-19 risk level was informed through the work of the council on a number of forums, including the University of East Anglia, the police and Public Health England, and at leadership and chief executive officer level with the other councils across the county. It was fundamental to the work of the council and its delivery of services and assessment of the Covid-19 risk level would be kept under constant review. Members also sought reassurance that the scores given to the council's commercial activities and wholly owned companies were appropriate and reflected the council's position. Recommendations from internal audit in relation to the wholly owned company, Norwich Regeneration Limited (NRL), had been fully implemented and the council, as shareholder, had received information on the commercial and financial position of the company.
18. The chief executive officer had requested a thorough review of the corporate risk register. It will take more than one year to embed in service plans. Members also noted that risk management was an important part of the Annual Governance Statement and that members would therefore receive updates on progress as part of this document.

Anti-Fraud and Corruption policy and strategy - Application

19. An important function of the committee is to ensure the adequacy of the council's anti-fraud and corruption policy and strategy and the effectiveness of their application.
20. The committee sought assurance that the council's administration of business support grants had the correct balance of due diligence and speed in application. In March 2020, the government advice had been to allocate grants to businesses as quickly as possible whilst government guidance was still being issued. Lessons had been learned and local authorities had been in a stronger position to mitigate fraud in the second tranche of business support grant allocation. The council did conduct its usual basic checks. It performed well in national league tables for issuing business support grants and had been the best performing local authority in Norfolk.
21. Members noted at the November committee meeting that overpayments of business support grants, due to office error and officers' unfamiliarity with the new system, had been recovered by deducting the sum when the claimant made an application for a further grant. If this had not been the case the claimant would have been invoiced for the overpayment and if not paid, would

be liable for prosecution. The five overpayments had been made in the first tranche and early on in the lockdown when there was pressure from government to pay people entitled to a grant as soon as possible. All standard checks had been made. Four of the five overpayments had been picked up by the claimants' banks.

22. The revenues and benefits team is part of a network with other local authorities and shares good practice and information with colleagues, including awareness of national alerts of fraudulent activity. The council is part of the National Fraud Initiative and data matching will potentially identify further fraudulent claims. The government has provided a new burdens grant to underwrite business support grants that were subject to fraud, provided local authorities can demonstrate due diligence and had a risk assessment and a post assurance plan in place. The council reported on the administration of the grants to central government and could increase more rigour to the process in line with government guidance.

Annual Governance Statement 2019-20

23. The Annual Governance Statement (AGS) 2019-20 when published included the recommendations from the committee to include headings and narrative text on Brexit and Future partnership working under Section 6, Governance and Issues. Members noted that Brexit had been identified on the corporate risk register but in terms of governance there was had been no specific reference. The committee considered that a no-deal Brexit would be a considerable threat to the management of capital programmes, business rates and funding. The AGS is a customer/resident facing document and the committee's view is that Brexit should receive the same clarity as the Covid-19 recovery plan. Members also considered that additional text was required to provide assurance on the governance arrangements for the council's new partnership arrangements, such as Norwich East, to ensure value for money and ensure that these projects were accountable, specifically given that public and private funding would be involved.
24. Members welcomed the revised format of the AGS with the inclusion of an action plan of key governance issues. The action plan contains details of the responsible officer and an expected due date, and actions are reported to the committee until the action is cleared, making it more transparent and easier for members to monitor.

Internal and external audit

Internal audit

25. The committee receives regular reports from internal audit and monitors the internal audit plan. The interim internal audit manager headed up the audit team and implemented a risk approach to audit rather than the compliance approach in previous years. The advantage of this approach is that key financial systems are audited over a three year term or based on risk if there was a system approach and had the benefit that it was flexible and could respond to emergencies, such as a cybersecurity. Members of the internal audit team underwent training to acquire new skills for this approach. Members also received assurance from the external auditor who endorsed a risk-based approach as appropriate and used by other authorities.

26. The committee was disappointed that the chief internal auditor's (LGSS) conclusion of the Annual Audit Report on Internal Audit and Fraud 2019-20 was an opinion of satisfactory assurance on the internal control environment; a change from good in the previous year (2018-19). The report highlighted the key areas for the change in the assurance level: NRL, the contract management audit review and the corporate risk register. The key financial systems were assessed as substantial.
27. The committee has monitored the progress of the actions taken to address the issues raised by internal audit where a limited assurance has been received by inviting the relevant senior managers to attend and answer members' questions. On 24 November 2020, the committee received reports on the management responses to internal audit reviews for Norwich Regeneration Company Limited (NRL) and contract management (housing repairs and responsive maintenance) and had an opportunity to question the senior managers. The audits would be reviewed again in April/May 2022 when the required actions were due to be implemented. The committee also considered the outcome of the internal audit review of waste management at its March meeting and were concerned about the "passive management" of this contract.
28. The outcome of these audits has led to concern about the performance of other contracts and to seek assurance that there are mechanisms in place to monitor and improve contract performance particularly as the council is bringing joint ventures in house and ensure that contracts provide value for money for our residents. The committee shares the interim audit manager's view that contract management should be kept under review. Members noted that the interim audit manager had provided a consultancy role to support the business relationship and procurement manager and team with contract compliance and that a driving up performance from the supply chain board had been established, which would oversee the council's contracts and address the issues identified in the audit review when contracts were granted or subject to renewal. The management of the contracts is the issue rather than the procurement procedures.
29. The committee approved the internal work plan for 2021-22 at its March meeting. The plan is drawn up by the corporate leadership team and changes to the plan are reported to the committee. The committee's role is to monitor the plan and make recommendations to cabinet and the chief finance officer. A request from the chair to take a more active role in the allocation of the work plan was refuted by the leader of the council at the constitution working party as this role lies with the corporate leadership team in line with the council's corporate plan and its priorities and risk management to manage internal audit. Additional days have been added to the plan this year to compensate days lost due to the pandemic. There is some contingency in the plan and the allocation of days is flexible and will depend on the delivery of the internal audit function which has been reviewed.
30. Members endorsed the internal audit plan. The chair commented that he would like to see more audit work on contract management but that he welcomed the reviews of the asset management and procurement strategies, and the audit approach and improved competencies in the team, as set out in the report.

External Audit

31. External auditors attend meetings of the committee when presenting reports and participate in meetings to answer members' questions and provide assurance where appropriate.
32. Members have an opportunity to comment on the external audit plan. The committee agreed the external audit plan for the accounts for 2019-20 at its meeting in June 2020. The plan sets out the external audit approach and scope for conducting the audit of the council's financial statements and highlights the key audit and value for money risks and audit strategy for those risks. The audit process provides a true and fair view of the council's financial statements at the end of the financial year.
33. The committee discussed the external audit plan for the financial statements (2020-21) with the external auditor and officers at the March meeting. External audit expected the plan to include the "big ticket items" audit risks, such as in previous years: management override of the controls to gain a better financial reporting; property, plant and equipment evaluation because of the size on the balance sheet, and pension liability because of the size on the balance sheet. The external auditors also expect to discuss with officers the impact of Covid on the council's activities and how it translates into the council's year end set of accounts, particularly around grant funding and provisions for bad debts which were expected to increase.
34. The committee suggested that the following items should be included in the planning process of external audit plan, subject to an assessment of any or all would lead to a material misstatement in the financial documents or a risk to the external auditor's value for money considerations, as part of the planning process:
 - a) The policies and procedures;
 - b) Contract management;
 - c) Governance arrangements for the council's wholly owned companies and insourcing joint ventures;
 - d) Medium term financial strategy.

The external audit plan 2020-21 is subject to consideration at the July meeting.

35. The Public Sector Audit Appointments (PSAA) is the regulator that sets the fees for external audit and these have not been reviewed them for several years. External audit maintain that the level of tests and assurances required from the local authority audits, particularly due to the increase in commercial activity, have increased and the level of fees is considered to be not sustainable to cover the costs of the audits. A joint letter from all the Norfolk councils was sent to the PSAA requesting clarification of what was considered an appropriate increase and seeking guidance to inform the discussions of individual councils with the external auditors.
36. The committee at its March 2020 meeting had resolved to write to the PSAA and Secretary of State, Department of Housing, Communities and Local Government. The chair explained that because of Covid-19 the deadlines for the publication of accounts had changed, and following consultation with the vice chair, cabinet members and CLT, the action had not been taken. Following

a resolution on 14 July 2020, the chair and cabinet member for resources wrote to the PSAA and Secretary of State and were pleased to receive confirmation that the PSAA was liaising between the external auditors and councils on this issue.

37. The committee continues to be assured of the quality of the external audit. The external auditors are subject to regulation by the Financial Reporting Council. Ernst & Young had been the top performers in its assessment.
38. It had not been possible this year to conduct audits on site and hand over documents. The external auditor confirmed that he would not have signed off any document unless he had sufficient assurance. Remote verification would no doubt form part of external audits going forward.
39. Before the pandemic external audit was facing challenges around timetabling audits, which has been exacerbated by the continuing Covid-19 restrictions. The accounts for 2019-20 had finally been signed off on 21 January 2021 and this year's accounts will not be signed off by 30 September due to pressures on external audit. This is a national problem for external auditors and was raised under the Redmond Review.

Statement of accounts

40. The committee considers the draft financial statements before publication and submission to external audit. On 14 July 2020, the committee noted that it was a credit to the finance team and budget managers that the draft accounts had been submitted in July, well in advance of the revised deadline of 31 August 2020. The committee had a lengthy discussion on the financial statements at this meeting. There is no requirement for the committee to approve the unaudited accounts but this gives an opportunity for members to understand the process.
41. The committee had an opportunity to attend an informal presentation on the audited accounts prior to the committee meeting. This was a useful session for members and helped their understanding.
42. On 24 November 2020, the committee considered *The Statement of Accounts and Audit Results Report 2019-20* the committee approved the statement of accounts 2019-20 subject to the completion of any outstanding audit work; and, if any outstanding audit work gives rise to a material adjustment to the accounts, to delegate approval of the statement of accounts, as amended/adjusted in line with audit findings, to the chief finance officer, in consultation with the chair (or vice chair) of the committee, and to delegate the signing off of the accounts to the chief finance officer in consultation with the chair. The accounts were signed off on 21 January 2021. The inspection period had been re-advertised and no further matters had arisen following this or from the residual external audit work. All assets were within an acceptable range. The chair also signed the letter of management representation.
43. The external auditor gave an unqualified opinion on the accounts and the value for money opinion. This opinion was confirmed in the Annual Audit Letter 2019-20 (audit committee, 9 March 2021).

Referral Powers and Accountability Arrangements

44. The committee's discussions and recommendations relating to the effectiveness of the governance, risk management and internal control frameworks, financial reporting arrangements and internal and external audit, are recorded in the minutes of the meetings. Where appropriate the committee's recommendations on any of these matters are referred to cabinet or the chief finance officer, as set out in the terms of reference. Meetings are attended by the key officers and other members of the corporate leadership team and senior managers, internal and external audit, who contribute to the discussions and are accountable for ensuring that the committee's recommendations are given due consideration. The cabinet member for resources also attends all meetings of the audit committee.
45. The committee has been effective in undertaking the functions set out in the terms of reference in accordance with the council's procedure rules and the Accounts and Audit Regulations 2015.

Audit Committee

Membership of the Audit Committee shall comprise 8 members appointed by the Council (excluding Cabinet members). Additionally, up to two independent non-voting co-opted members may be appointed on the basis of their skill, knowledge, qualification and experience relevant to the role of the committee.

The chair of the committee is elected by the council and the vice-chair is appointed by the committee.

Within the policies laid down by the council and within the Corporate Plan to exercise the following powers of the council:

Corporate governance

1. Review the effectiveness of internal control across the council and the adequacy of actions taken to address any weaknesses or control failures.
2. Consider the adequacy and effectiveness of the council's arrangements for the identification and management of the organisation's business risks; including the risk management policy, strategy and risk register.
3. Receive and consider regular reports at least twice a year on the risk environment, corporate risk register and associated management actions.
4. Review and ensure the adequacy of the council's anti-fraud and corruption policy and strategy and the effectiveness of their application.
5. Review and ensure that adequate arrangements are established and operating to deal with situations of suspected or actual fraud and corruption.
6. Review, consider and agree the Annual Governance Statement, including the adequacy of the corporate governance framework and improvement action plan contained within it.
7. Receive periodic updates on improvement actions taken.

Internal and external audit

8. Approve the internal audit charter.
9. Approve and monitor delivery of the internal audit strategy.
10. Consider, endorse and monitor delivery of the internal audit annual work programme, including any significant in-year changes to the programme or resource requirements.
11. Ensure adequate resourcing of the internal audit function, approving any significant additional consulting services requested from internal audit not already included in the internal audit annual work programme.
12. Receive and consider the annual internal audit report and opinion on behalf of the council.
13. Oversee the annual review of the effectiveness of the system of internal audit, to include the performance of the internal audit function, compliance with standards and delivery of improvement actions.
14. Contribute to the external quality assessment of internal audit that takes place every five years.
15. Commission work from internal and external audit and consider the resulting reports.

16. Comment on the scope and depth of external audit work and ensure it gives value for money.
17. Ensure that there are effective relationships between external and internal audit, inspection agencies and other relevant bodies, and that the value of the audit process is actively promoted.
18. Seek assurance that action has been taken to implement the recommendations arising from the findings of significant audit and inspection work.

Statement of accounts

19. Discuss the annual audit plan for the audit of the financial statements with external audit.
20. Consider the external auditor's annual letter, relevant reports and the report to those charged with governance.
21. Review and approve the annual statement of accounts, including subsequent amendments on behalf of the council.

Referral powers

22. Make recommendations for due consideration on all matters described above. Recommendations relating to all paragraphs except 9-10 and 12-21 shall be made to the Cabinet and Chief Finance Officer. Recommendations relating to paragraphs 9-10 and 12-21 shall be made to the Chief Finance Officer.

Accountability arrangements

23. Report to those charged with governance on the committee's findings, conclusions and recommendations concerning the effectiveness of their governance, risk management and internal control frameworks, financial reporting arrangements and internal and external audit functions.
24. Report to full council on the committee's performance in relation to the terms of reference and effectiveness of the committee in meeting its purpose.

