

Broadland Cabinet

Agenda

Members of the Broadland Cabinet

Cllr Susan Holland (Chairman)
Cllr Stuart Beadle
Cllr Martin Booth
Cllr Jan Davis

Cllr Natasha Harpley (Vice-Chair)
Cllr Steve Riley
Cllr Dan Roper

Date & Time:

Tuesday, 19 March 2024 at 6.00 pm

Place:

Conference Centre - Horizon Centre, Peachman Way, Norwich, NR7 0WF

Contact:

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Email: committee.bdc@southnorfolkandbroadland.gov.uk
Website: <http://www.southnorfolkandbroadland.gov.uk/>

Public Attendance:

This meeting will be live streamed for public viewing via the following link:

<https://www.youtube.com/channel/UCZciRgwo84-iPyRImsTCIng>

If a member of the public would like to attend to speak on an agenda item, please email your request to committee.bdc@southnorfolkandbroadland.gov.uk, no later than 5.00pm Thursday, 14 March 2024.

AGENDA

1. **Declarations of Interest** (Pages 4 - 6)
To receive declarations of Interest from Members (guidance attached).
2. **Apologies for absence**
To report apologies for absence from members.
3. **Minutes** (Pages 7 - 15)
To confirm the minutes from the meeting of the Cabinet held on 13 February 2024, and to consider any matters arising.
4. **Public Speaking**
To consider representation from the members of the public who have expressed the wish to convey their views on items on this agenda.

In accordance with the Constitution a period of 3 minutes is allowed per member of the public.
5. **Overview and Scrutiny Committee**
Cabinet will be advised of the views expressed by the Committee at its prior meeting. The Chair of the Committee will provide the feedback in relation to all items on the agenda at this point. The Chair will use their discretion as to whether further clarity is required when particular agenda items are decided upon later in the agenda.
6. **Representations from Non-Cabinet Members**
To receive views from non-cabinet members on items in this agenda. Each member may have three minutes to speak on any of the upcoming items at this point in the proceedings. All non-Cabinet members must ensure that they are within the set 15 minutes overall.
7. **Strategic Performance, Risk and Finance Report for Quarter 3 2023/24** (Pages 16 - 78)
8. **Adoption of the Greater Norwich Local Plan** (Pages 79 - 173)
9. **Norfolk Nutrient Mitigation Fund - Schemes and Governance** (Pages 174 - 199)
10. **Strategic Asset Management Framework** (Pages 200 - 223)

11. **Forward Plan** (Pages 224 - 228)
12. **Exclusion of the Press and Public**
To consider whether to pass a resolution under section 100A of the Local Government Act 1972 to exclude the Press and Public from the meeting for the following items of business on the grounds that the consideration of the items is likely to involve the disclosure of exempt information as defined in Paragraph 3 of Part I of Schedule 12A of the Act.
13. **Social Prescribing: Contracting with the NHS in Suburban Broadland** (Pages 229 - 235)
14. **Business Case for Opportunities Funded Post** (Pages 236 - 240)

Agenda Item 1

Interests Flowchart

The flowchart below gives a simple guide to declaring an interest under the code.

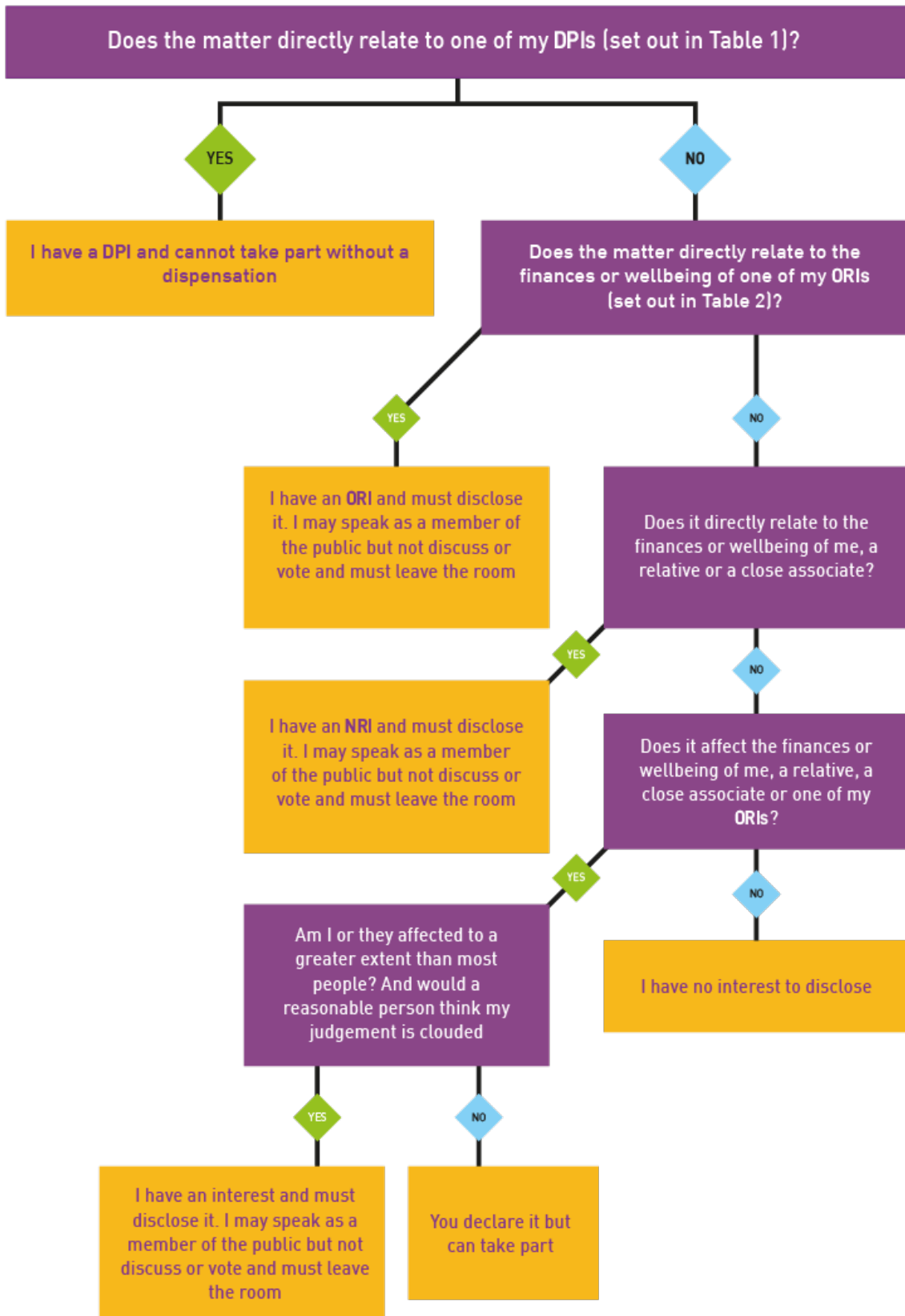


Table 1: Disclosable Pecuniary Interests

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the

[Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012.](#)

Subject	Description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract made between the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council — (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged
Land and Property	Any beneficial interest in land which is within the area of the council. 'Land' excludes an easement, servitude, interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/ civil partners (alone or jointly with another) a right to occupy or to receive income.
Licenses	Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer

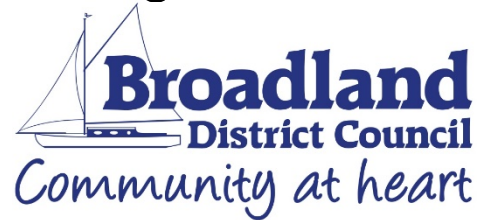
Corporate tenancies	Any tenancy where (to the councillor's knowledge)— (a) the landlord is the council; and (b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/ civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.
Securities	Any beneficial interest in securities* of a body where— (a) that body (to the councillor's knowledge) has a place of business or land in the area of the council; and (b) 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) If the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/ her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners have a beneficial interest exceeds one hundredth of the total issued share capital of that class.

* 'director' includes a member of the committee of management of an industrial and provident society.

* 'securities' means shares, debentures, debenture stock, loan stock, bonds, units of a collective investment scheme within the meaning of the Financial Services and Markets Act 2000 and other securities of any description, other than money deposited with a building society.

Table 2: Other Registrable Interests

<p>You must register as an Other Registerable Interest :</p> <ul style="list-style-type: none"> a) any unpaid directorships b) any body of which you are a member or are in a position of general control or management and to which you are nominated or appointed by your authority c) any body <ul style="list-style-type: none"> (i) exercising functions of a public nature (ii) directed to charitable purposes or (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union) of which you are a member or in a position of general control or management



BROADLAND CABINET

Minutes of a meeting of the Broadland Cabinet of Broadland District Council, held on Tuesday, 13 February 2024 at 6.00 pm.

Committee Members Present: Councillors: N Harpley (Chair), S Beadle, J Davis, S Riley and D Roper

Apologies for Absence: Councillors: S Holland and M Booth

Officers in Attendance: T Holden (Managing Director), D Lorimer (Director of Resources), P Courtier (Director of Place), J Sutterby (Director of People and Communities), E Hodds (Chief of Staff), G Denton (Assistant Director of Economic Growth), N Howard (Assistant Director for Regulatory), C Lawrie (Assistant Director of ICT/Digital and Transformation), H Mellors (Assistant Director of Planning), S Phelan (Assistant Director of Community Services), M Pursehouse (Assistant Director of Individuals and Families), J Nichols (Capital & Treasury Accountant), G Pell (Corporate Accountant), S Pontin (Planning Business Improvement Team Manager), J Pyle (PR Manager), S Carey (Strategic Advisor and Deputy Monitoring Officer), V Parsons (People from Abroad Programme Manager) and J Overy (Democratic Services Officer)

Also in Attendance: Councillors: S Clancy, K Kelly, M Murrell, N Starling and F Whymark

80. DECLARATIONS OF INTEREST

In respect of agenda item 12 (Local Authority Housing Fund Rounds 1 and 2 - Further Opportunities), Cllr N Harpley and the Director for People and Communities (J Sutterby) declared other registerable interests as Directors of Broadland Living Ltd, Cllr Harpley confirmed that she would not take part in the debate or vote on this matter.

81. APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllrs M Booth and S Holland.

82. MINUTES

The minutes of the meeting held on 16 January 2024 were confirmed as a correct record.

83. OVERVIEW AND SCRUTINY COMMITTEE

The Chairman of the Overview and Scrutiny Committee advised Cabinet that at the 6 February 2024 meeting he had used his casting vote to recommend the proposals in the Revenue Budget and Council Tax 2024/25, the Capital Strategy, and the Council Plan items. Some points had been made by members that the Council Plan lacked sufficient ambition, as well as some queries about individual elements of funding.

All the other items were recommended to Cabinet unanimously, with members supporting the proposals for increasing pre-application planning fees to recover costs and welcoming the pro-active approach being taken by the Council to access funding for temporary accommodation through the Local Authority Housing Fund.

84. REVENUE BUDGET AND COUNCIL TAX 2024/25

The Director for Resources introduced the report, which presented the revenue budget for approval by Council.

The report set out the various steps involved in setting the budget, which comprised of the assessment of the cost of services, budgeting for other types of income and expenditure and taking account of Government funding, which had increased by £466,000 since last year. The report also assessed Business Rates income and identified the income that needed to be collected from Council Taxpayers.

Overall, this work had resulted in a balanced budget with no need to draw on General Reserves and a recommendation to increase Council tax for a Band D property by £5 to £134.91, which equated to a 3.85 percent increase. Members were advised that most responses to the budget consultation indicated support for a rise in the level of Council Tax.

It was also proposed to increase fees and charges in line with the September 2023 Retail Price Index figure of 8.9 percent, as well as a £6 reduction in Special Expenses for maintaining the streetlights in Great Witchingham and Hellesdon, following a review.

Attention was drawn to the advice of the Section 151 Officer which confirmed that the budget was robust, and the level of reserves were adequate.

Cabinet was also advised that the final Government Finance Settlement had now been received and that this had not led to any significant change in the provisional figures as set out in the report. Recommendation 1 could, therefore, be amended to delete the delegation of any final adjustment in the budget.

Cllr Riley, the Portfolio Holder for Finance, advised the meeting that the budget had been very challenging given the severe financial pressures faced by the Council and the need to review the Capital Programme to avoid the Council's reserves being depleted.

He drew attention to the Medium-Term Financial Strategy which showed that the funding gap had been reduced to £200,000 down from the figure of £1m reported to Cabinet in October 2023 and he thanked officers for their hard work in helping to reduce the gap significantly.

In response to a query about the reduction in Special Expenses, the Assistant Director for Economic Growth advised the meeting that this had been possible because of an extensive upgrade of street lighting to LED bulbs together with a new management system that had reduced operating costs.

Cllr Roper, the Portfolio Holder for Transformation and Organisational Development, noted the gap in the Medium-Term Financial Plan had been reduced by 80 percent and congratulated officers and the Portfolio Holder for Finance on bringing this figure down and placing the Council in a very strong position. He also noted the contribution of revenue to the Capital Programme and that the increase in Council Tax would help deliver the Council's transformation programme, which would save money for Broadland residents in the long-term.

The Chair concurred with the above comments and added her congratulations to officers who had worked tirelessly to produce the budget.

It was unanimously,

RECOMMENDED TO COUNCIL

1. The approval of the 2024/25 base budget.
2. That the Council's demand on the Collection Fund for 2024/25 for General Expenditure shall be £6,610,050, and for Special Expenditure shall be £98,931.
3. That the Band D level of Council Tax be increased by £5 to £134.91 for General Expenditure.
4. That the Band D level of Council Tax be £2.02 for Special Expenditure.
5. Changes to the proposed fees and charges as set out in section 6.

RESOLVED

To note

1. The advice of the Section 151 Officer with regard to section 25 of the Local Government Act 2003, contained in section 12 of this report.

2. The Medium-Term Financial Strategy projections.

Reasons for Decision

The report was a factual account.

85. CAPITAL STRATEGY AND CAPITAL PROGRAMME 24/25 TO 28/29

The Director for Resources introduced the report, which set out the Council's approach to the use of its capital assets and resources for determining the Capital Programme.

The five-year Capital Programme came to a total of £21.044m. Expenditure for the Programme would be funded from reserves, grant funding and capital receipts. There would be no requirement to borrow to fund the Programme.

The Capital Programme included £5m for investment in Broadland Growth Limited to enable the company to deliver housing development and generate an investment return to the Council.

It also included repairs and maintenance, Disabled Facilities Grants and refurbishment of the Waste Depot. A full breakdown of the Programme was set out in Appendix B to the report.

The funding analysis at paragraph 9.4 showed that £4.270m of General Revenue Reserves was required to fund the Programme and that the S151 Officer advice confirmed that there was a need to review the Medium-Term Capital Programme during the forthcoming financial year to reduce the potential draw on the General Revenue Reserve. It was noted that Cabinet remained fully aware of this issue and was committed to continually reviewing the Programme moving forward, to ensure that the Council obtained value for money and that the Programme was affordable.

Cllr Riley, the Portfolio Holder for Finance, emphasised the importance of reviewing the Capital Programme, as the decision at the February 2023 Cabinet to use £5.5m of General Reserves to fund capital spending was clearly unsustainable. He noted that the report had made progress in this, with three reserves totalling £1.1m being repurposed and £250,000 from the revenue budget going towards the Capital Programme. If it proved to be affordable, it was intended continue to provide this sum from the revenue budget in future years.

Cllr Roper, the Portfolio Holder for Transformation and Organisational Development, endorsed the report and emphasised that although the Broadland Growth Reserve was not allocated for any specific project at this time, a number of schemes and external funding sources were being looked at and could be expected to come forward in due course.

Cllr Davis, the Portfolio Holder for Environmental Excellence, added his support for the Capital Programme and noted that the Council was embedding measures to reduce the carbon footprint of its services and across the district generally, for example as lead authority in Norfolk for the delivery of the Warm Homes

Programme, as well as being in a good position to take advantage of opportunities of further Government funding going forward

It was,

RECOMMENDED TO COUNCIL

To approve the Capital Strategy (Appendix A) and the Capital Programme for 2024/25 to 2028/29 (Appendix B).

RESOLVED

To note the advice of the Section 151 Officer in section 12 of the Capital Strategy.

Reasons for Decision

The report was a factual account.

86. TREASURY MANAGEMENT STRATEGY STATEMENT 2024/25

The Corporate Accountant introduced the report, which set out the Council's approach to the management of its investments and cash flows.

Members were advised that there had been no significant changes to the Strategy for 2024/25

The Strategy adhered to the following three key treasury management principles:

1. Security – To ensure monies were not placed at undue risk, by ensuring all monies were invested in appropriate counterparties or instruments commensurate with the organisation's risk appetite.
2. Liquidity - To ensure that cash flow was adequately planned, with cash being available when it was needed, and that sufficient funding was available to finance the organisation's capital investment plans.
3. Yield - To maximise investment returns (commensurate with risk) and minimise borrowing costs to minimise the costs to the organisation.

It was emphasised that the security of the Council's funds was the most important of these considerations.

It was,

RECOMMENDED TO COUNCIL

To approve:

1. The Treasury Management Strategy Statement 2024/25
2. The Treasury Management Policy Statement 2024/25 (Appendix 1)

3. The Annual Investment Strategy 2024/25 (Appendix 2)
4. The Treasury Management Practice (TMP1) (Appendix 3)
5. The Treasury Management Scheme of Delegation (Appendix 4)
6. The Prudential Indicators (Appendix 5)
7. The Minimum Revenue Provision (MRP) Statement (Appendix 6).

Reasons for Decision

The report was a factual account.

87. COUNCIL PLAN 2024-2028 & DELIVERY PLAN 2024-2026

The Strategic Advisor and Deputy Monitoring Officer introduced the report which presented the new Council Plan 2024-2028 and accompanying Delivery Plan for the period covering 2024-2026.

The Council Plan set out the overarching vision and priorities for the district and the organisation for the coming four years and was divided into the following four key priority areas,

- Empowering individuals and communities
- Cleaner, greener Broadland
- Providing the right homes in the right places
- Sustainable resilient local economy

Each of these strategic objectives specified the current challenges and opportunities facing the Council and the actions that it would be taking to meet these aims.

The Delivery Plan supported this by setting out the work that would be undertaken to achieve these strategic priorities in the first two years of the Council Plan and included the key performance indicators that would be used to monitor progress and performance.

Cllr Roper, the Portfolio Holder for Transformation and Organisational Development, commended the report, which presented an ambitious Council Plan and in particular the priority of providing the right homes in the right places, which was a significant issue for many residents in Broadland. He also noted that the Delivery Plan was very forward looking and incorporated much of the activity around collaboration as business as usual, which would allow for a clear focus on the effective delivery of services for residents. He also noted that the overarching strategic objective in the Council Plan was to be a modern, caring Council safeguarding our future.

Cllr Riley, the Portfolio Holder for Finance, added that the Plan encompassed all areas of the Council and that included the revenue and capital account for the delivery and improvement of services for residents and he noted the success of the Community Grant Fund as an example of this.

Cllr Davis, the Portfolio Holder for Environmental Excellence, noted that the Plan built on the Council's commitment to address climate change by refreshing the Environmental Strategy to reduce carbon emissions at the Council and across the district and enhance the environment by driving behavior change in a number of areas, such as waste and recycling, as well as supporting businesses and communities to reduce carbon emissions and improve energy efficiency. The Council was also being proactive in terms of biodiversity gain, as well as working with partners such as the Norfolk Climate Change Partnership on Net Zero Communities. He endorsed the Plan.

It was unanimously,

RECOMMENDED TO COUNCIL

To approve the adoption of the Council Plan 2024-2028 and Delivery Plan 2024-2026.

Reasons for Decision

To set out the overarching vision and priorities of the Council.

88. REVIEW OF PRE-APPLICATION PLANNING FEES

The Business Improvement Manager introduced the report which reviewed the charging structure for pre-application advice for planning applications.

Members were reminded that the Council introduced a charging structure for pre-application advice in 2021.

Following a recent update of national fees for planning applications and taking account of the recently agreed Joint Commercialisation Strategy and the current consideration of the Charging Policy, it was considered appropriate to review charges for pre-application advice.

Cabinet was reminded that the service was discretionary, but it was recognised that that it was valued by customers and could result in significant savings for them when submitting planning applications.

The review of charges had taken account of the increasing complexity of advice provided in the light of issues such as nutrient neutrality, the Green Infrastructure Recreation Avoidance Mitigation Strategy and biodiversity net gain.

In an update to the report Cabinet was informed that the figures used to calculate the projected income for the 'General Enquiry' category had incorrectly included enquiry types that it was proposed to continue to be undertaken for free.

Within this category were enquiries which related to:

- Listed Building advice.
- Tree works advice.
- Compliance with conditions advice.

- Follow up enquiries.
- Notifications under permitted development rights.

The proposed charges would relate to approximately ten percent of enquiries submitted in this category and lead to a revised predicted income of £86,000 per year against the current income £22,000 per year.

In a further amendment to the report, it was proposed that, in line with the usual practice when updating fees, they be rounded to the nearest £5.

In summary, it was proposed to continue providing initial high-level advice and permitted development advice to customers free of charge, but for a more comprehensive response that involved research or input from a range of officers / consultees, it was proposed to review the range of charges for the pre-application advice. The fee would include follow up discussions / meetings as appropriate, without a further fee.

It was considered that the proposed increases were proportionate and were on a cost recovery basis and would result in being able to better meet demand and improve the service offered.

RECOMMENDED TO COUNCIL

To agree the revised charging structure, as set out in Appendix 3, from 1 April 2024, with the fees being rounded up to the nearest £5.

Reasons for the Decision

To review and increase pre -application charges in order to recover costs for the service.

89. LOCAL AUTHORITY HOUSING FUND ROUNDS 1 AND 2 -FURTHER OPPORTUNITIES

The Assistant Director for Individuals and Families introduced the report, which sought pre-emptive agreement for the financing and purchase of further general use Temporary Accommodation properties under the Government's Local Authority Housing Fund (2) scheme. In accordance with the existing terms of the Fund the completion of properties purchased would need to take place by 29 March 2024.

Members were advised that Broadland had submitted an expression of interest to access this Fund on the 19 January 2024, subject to formal Council acceptance of any subsequent offer.

The Government had yet to respond with a formal allocation offer, however given the timescales for completion officers were seeking pre-emptive approval from Cabinet.

The expression of interest had requested £240,000 of capital to purchase two homes with £40,000 for refurbishment.

The Fund would subsidise 40 percent of the value of the properties and would

also benefit the Council by reducing the significant cost of bed and breakfast accommodation.

The Portfolio Holder for Finance, Cllr Riley, noted the demand on the temporary accommodation service and the subsequent financial burden on the Council if using bed and breakfast to meet this demand. He further noted that if the bid was successful the Council would match fund the purchase of the properties via the Broadland Growth General Reserve and that this would lead to savings of approximately £180,000.

It was,

RESOLVED

Should an allocation of LAHF be made available to the Council:

To delegate to the Director of People and Communities to accept the Government offer to the Council of LAHF funding for the purchase and refurbishment of further properties to be used as general needs temporary accommodation.

RECOMMENDED TO COUNCIL

To delegate to the s151 officer the addition of up to £235,000 to the LAHF capital budget to enable the provision of matched funding, to be funded via Broadland Growth general reserves monies.

Reasons for the Decision

To increase the Council's stock of temporary accommodation and address urgent housing need.

90. FORWARD PLAN

Cabinet noted the latest version of the Council's Forward Plan.

(The meeting concluded at 6.48 pm)

Chairman

Agenda Item 7



Cabinet
19 March 2024

STRATEGIC PERFORMANCE, RISK AND FINANCE REPORT FOR QUARTER 3 2023/24

Report Authors:

Finance:

Darren Slowther (Senior Finance Business Partner)
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Performance/Risk:

Corinne Lawrie (AD Transformation, ICT & Digital)
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Portfolio:

Finance
Transformation and Organisational Development

Wards Affected:

All

Purpose of the Report:

The purpose of the Strategic Performance, Risk and Finance Report is to provide an overview of the performance of the Council against the key outcomes set out in the Delivery Plan for 2022/24. This Quarterly Report covers Quarter 3.

Recommendations:

1. To endorse the revenue and capital position for quarter 3 (variance details in Appendix 1).
2. To endorse the Quarter 3 2023/24 performance (detailed in Appendix 2).
3. To endorse the current position with respect to risks and agree the actions to support risk mitigation (detailed in Appendix 3).
4. to agree to purchase a further £49,900 £1 shares in Broadland Living to bring the total equity investment to £50,000.

1. Introduction

- 1.1. This report provides an overview of the performance of the Council and is aligned to the key outcomes set out in the Council's Delivery Plan for 2022/24. The new Delivery Plan for 24/25 has been agreed and will commence from 1st April 2024. This Quarterly Report covers Quarter 3 of 2023/24 and uses an exception-based approach. Where the targets have not been met and/or where there is declining performance an explanation of performance is provided.

2. Background

- 2.1. This report summaries the Council's performance and finance position for Quarter 3 with additional detail set out in the appendices as per below.

Appendix 1 – Finance

Appendix 2 – Performance Report for Quarter 3 2023/24

Appendix 3 – Strategic Risk Register.

3. Current Position / Findings

- 3.1. The sections below provide a summary for finance, performance and risk data.

Financial Summary

- 3.2. As at the end of December, BDC is facing a number of inflationary and demand pressures. Overall, there is a total pressure of £341,000 on the cost of core services, and action will be taken to try to reduce this overall cost pressure over the remaining part of the year. However, this is offset by buoyant investment income, due to having higher cash balances and higher interest rates than expected.

- 3.3. As at the end of December BDC has spent £9.606m on capital schemes in 2023/24.

Finance Revenue Dashboard Overview

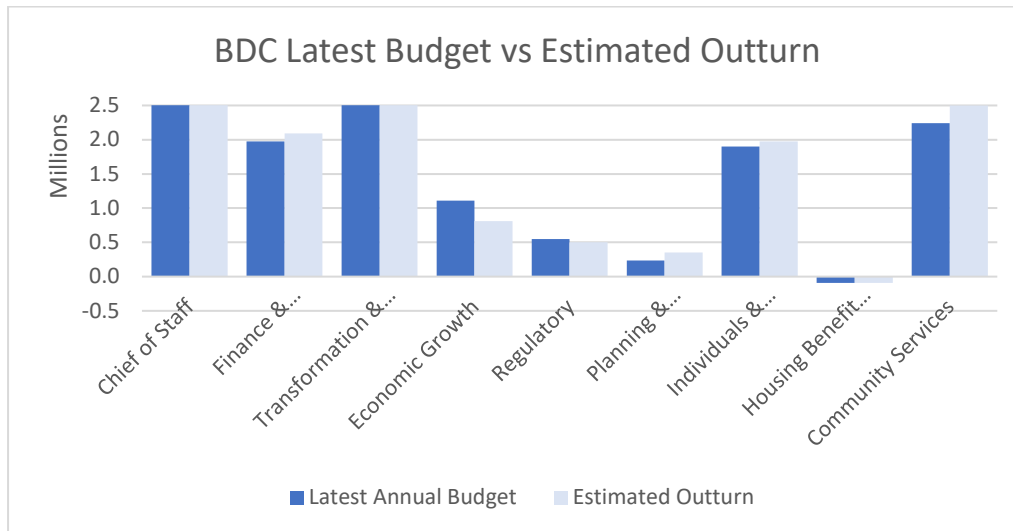
- 3.4. The following table provides a summary of the revenue estimated budget position.

	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date (P10) £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000
CORE SERVICES					
Chief of Staff	2,573	2,598	1,947	2,541	57
Finance & Corporate Costs	2,132	1,975	1,828	2,091	-116
Transformation & ICT / Digital	2,489	2,502	1,468	2,568	-66
Economic Growth	1,105	1,110	1,745	919	191
Regulatory	514	547	383	503	44
Planning & Business Support	212	234	338	353	-119
Individuals & Families	1,759	1,901	835	1,977	-76
Housing Benefit Payments	-91	-91	141	-91	0
Community Services	2,231	2,242	2,119	2,498	-256
	12,924	13,018	10,805	13,359	-341
Community Services - Food Waste Expansion	500	500		630	-130
Transfer (from) Waste Reserve	-500	-500		-630	130
COVID SUPPORT					
COVID Support			212	212	212

	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date (P10) £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000
Transfer (from) Covid Reserve			-212	-212	-212
OTHER PROJECTS					
Opportunity Revenue Projects		6	152	152	-146
Transfer (from) Op Project Reserve				-152	152
OTHER INCOME & EXPENDITURE					
Internal Drainage Board Levy	288	288	294	294	-6
Interest Payable / Minimum Revenue Provision	1	1	0	1	0
Investment Income	-1,108	-1,108	-1,511	-1,748	641
Council Tax Surplus	-51	-51	0	-51	0
TRANSFERS					
Transfers to / (from) Earmarked Reserves	746	719	650	719	0
Transfers to / (from) General Reserves	0	-74	0	300	-300
Total to be Funded by Taxpayers and Government Grants	12,800	12,800	10,391	12,800	

- 3.5. **Chief of Staff** is predicting is a favourable variance of £57k against budget for the following main reason.
- Additional new burdens funding received from Government (£68k).
- 3.6. **Finance** is predicting an adverse variance of £116k against budget for the following reasons.
- Additional temporary staff costs of £42k for Finance to cover a vacancy and to provide additional support for the Financial Transactions Team to cover an increased volume of transactions being processed.
 - £71k for Revenues and Benefits to cover vacancies and additional agency staff costs related to the implementation of the new system.
- 3.7. **Transformation and ICT / Digital** is predicting an adverse variance of £66k against budget for the following reasons.
- £93k additional IT costs for several reasons including higher usage spend than budgeted for on data and mobile phones, data line costs are higher than expected due to increased resiliency requirements and additional firewall costs of £14.5k have been incurred. There have also been unexpected software costs relating to retaining legacy Revenues and Benefits system following consolidation to one system.
 - £37k of savings are forecast from the transformation team restructure with £64k of savings forecast from customer services due to unfilled vacancies.
 - Thorpe Lodge was budgeted for 6 months as an unoccupied building, however occupancy continued for another 2 months until the end of May for which SNC have been recharged their share. This led to higher costs such as utilities, maintenance and rates together with an ongoing holding cost which will continue until the disposal of the building. A shortfall in income in relation to rental at the Horizon Centre is anticipated to be £26k.
- 3.8. **Economic Growth** is predicting a favourable variance of £191k against budget for the following main reasons.
- There is a net £104k saving on staffing, due to an establishment post being funded by a project and savings in vacancy turnover/reduced hours.
 - Forecast increased costs for public conveniences and car parking of £34k.

- An overall positive variance on community asset costs of £48k.
- 3.9. **Regulatory** is predicting a favourable variance of £44k against budget for the following main reasons.
- £120k predicted increase in private hire licensing income.
 - Additional costs in Community and Environmental Protection including £55k for agency staff costs for an interim Environmental Protection Officer and £10k works in default costs incurred on the Thorpe Island sewage pipe (some of these costs may be recovered from the landowner in the future, although this is still uncertain).
- 3.10. **Planning and Business Support** is predicting an adverse variance of £119k against budget for the following reasons.
- Planning application income is currently £191k short of predicted income. Lower fee income has partially been offset by additional Planning Performance Agreement and Government grant income.
 - Planning Policy is predicting a favourable variance of £67k, mainly due to the fact that the budget for the Design Code is unlikely to be spend this year and will need to be carried forward to 24/25.
 - There are vacancy savings from Business Support from positions unlikely to be filled in the short term. These savings have been offset by lower land charge income caused by the downturn in the housing market.
- 3.11. **Individuals & Families** is predicting an adverse variance of £76k against budget for the following reasons main.
- A £15k cost due to the correction of coding of a post to BDC only (Handyman).
 - Increased demand for spot purchased accommodation for rough sleepers. Funding supports seven cases, however current number supported is 17, leading to increased costs of £15k.
 - Higher demand for spot purchased accommodation in benefits and housing. The overall variance is £58k adverse. Increased expenditure has been mitigated by authority owned housing stock and Government funding.
- 3.12. **Housing Benefits** is predicting to be on budget.
- 3.13. **Community Services** is predicting an adverse variance of £257k against budget for the following significant reasons.
- Additional costs of £241k attributable to waste consisting of -
 - Additional waste costs of £26k because of the Coronation bank holiday; additional container management costs of £139k (currently the subject of a challenge with the contractor); £35k matched funding costs for hydrotreated vegetable oil as set out in the Veolia contract and £52k costs for additional instructed collections for 'missed' bins.
 - Additional garden waste service costs of £28k.
 - Additional recycling strategy costs of £26k.
 - Net savings of £24k in recyclable waste due to a reduction in overall tonnage collected.
- 3.14. A more detailed analysis of the variances is attached as Appendix 1
- 3.15. The estimated outturn position is shown graphically below.



Business Rates Income / NDR Pooling

3.16. Norfolk local authorities participate in a business rates retention pool. Any gain from pooling is shared between the Local Authorities. We do not know at this stage what the pool dividend (if any) will be for 23/24.

Investments

3.17. **Investment Income Interest** is received on external cash investments. The budget was increased for 2023/34 to reflect increases in interest rates and higher levels of cash balances. Further base rate increases by the Bank of England have led to increasingly higher investment rates being available to the authority and we are currently forecasting income of £1.748m, exceeding the budgeted amount of £1.108m.

3.18. **Equity Investment in Broadland Living** Broadland Living was incorporated on 31 October 2023, and the current equity investment in Broadland Living is 100 £1 shares. The company is in the process of acquiring the six resettlement properties that have been part funded by the Government's Local Authority Housing Fund.

3.19. The level of initial equity has therefore been reviewed to ensure that the balance of loan and equity is appropriate, and that Broadland Living has sufficient cash in order to function as a trading entity. Consequently, **Broadland Cabinet are requested to agree to purchase a further £49,900 £1 shares in Broadland Living to bring the total equity investment to £50,000.**

Finance Capital Dashboard Overview

3.20. The following table provides a summary of the capital position.

	Budget Manager	Provi- sional	Original Annual Budget (OAB) £000	Slippage and Other Changes £000	Latest Annual Budget (LAB) £000	Actual to Date (ACT) £000	Year End Forecast £000	Comment
Supporting Individuals - Housing								
Broadland Growth Developments	Debbie Lorimer	Y	3,000	-	3,000	-	-	Budget not required in the current year.
Travellers Sites	Helen Mellors	Y	-	300	300	-	-	Budget not required in the current year.
Temporary Accommodation Security Improvements	Mike Pursehouse		15	9	24	19	19	
Temporary Accommodation - Property Purchase	Mike Pursehouse		904	1,452	2,356	2,309	2,309	Purchase of Harvard Court.
Local Authority Housing Fund - Property Purchase	Mike Pursehouse		-	2,032	2,032	278	1,832	
Opportunities Funding - Temporary Accommodation	Richard Dunsire		-	26	26	11	26	
Social Housing (S106 Funded)	Mike Pursehouse		-	-	-	12	12	
Supporting Individuals - Health and Leisure								
Disabled Facilities Grants (Grant Funded)	Kevin Philcox		1,000	139	1,139	813	1,139	
Minor Improvement Grants	Kevin Philcox		30	-	30	-	-	This budget is an enabling budget to allow us to proceed with empty homes policy, rarely used.
Improvements in the Public Realm								
Street Lighting	Matthew Yates		35	216	251	-	240	-
Car Park Improvements	David Disney		25	128	153	2	153	£100k extra budget agreed by Cabinet in September.
Youngs Park Aylsham (GNGB Co-funded)	Steve Peet		250	-	250	-	250	This is money that will be paid out from Broadland District Council to reimburse Aylsham Football Club for their 3G pitch build. It will be claimed back from the Greater Norwich Growth Board.

	Budget Manager	Provi- sional	Original Annual Budget (OAB) £000	Slippage and Other Changes £000	Latest Annual Budget (LAB) £000	Actual to Date (ACT) £000	Year End Forecast £000	Comment
Bure Valley Railway / MW (Bridges)	Petra Maryon		90	-	90	66	90	Programme on works is underway which will fully use this budget.
Public Conveniences	Petra Maryon		164	12	176	-	128	Projects provisionally include Salhouse toilets (£48k) and Ranworth toilets (£50k) refurbishment.
Historic Buildings Grants / Buildings at Risk	Chris Bennett		15	24	39	19	19	-
One Public Estate - Taverham	George Denton	Y	1,500	-	1,500	-	-	Budget not required in the current year.
Shared Prosperity Grant Funded Projects	Debra Baillie-Murden		42	14	56	30	56	DLUHC have approved slippage of £14,250 from 2022/23 (received in 22/23). All funds must be spent in year.
Rural Prosperity Grant Funded Projects	Debra Baillie-Murden		142	-	142	83	142	DEFRA have approved investment plan; funds have been received. All funds must be spent in year.
Protecting the Environment								
Green Homes Grants (Fully Externally Funded)	Kevin Philcox		-	-	-	2,225	2,225	Expenditure matched by external grant funding.
Social Housing Decarbonisation Grants (Fully Externally Funded)	Kevin Philcox		-	-	-	1,638	1,638	Expenditure matched by external grant funding
Renewable Energy Projects and/or Associated Infrastructure	Annie Somazzi	Y	-	1,000	1,000	-	-	Budget not required in the current year.
Investment in the Economy								
Broadland Food Innovation Centre	George Denton		-	-	-	23	23	There is a retention on the construction contract of £60,000 which may need to be paid before the end of the financial year.
Our Own Needs								
Thorpe Lodge - Disposal	Neil Dyball		-	-	-	4	4	-
Horizon Centre - Capital Maintenance	Neil Dyball		30	724	754	782	782	-

	Budget Manager	Provi- sional	Original Annual Budget (OAB) £000	Slippage and Other Changes £000	Latest Annual Budget (LAB) £000	Actual to Date (ACT) £000	Year End Forecast £000	Comment
Horizon Centre - Public Sector Decarbonisation	Annie Somazzi		489	28	517	-	517	Expected to be fully spend as project end date is 31/3/24.
IT - PC Replacement Programme/BAU	Angela Schug		216	42	258	61	258	Expenditure to date includes replacement laptops and audio-visual equipment.
IT - Infrastructure	Angela Schug		341	204	545	194	419	Expenditure to date includes firewall upgrades and server replacement.
IT - Transformation Projects	Corinne Lawrie		184	307	491	205	317	Revenues/Benefits and Payroll system projects completed by year end.
IT - WIFI - Horizon Centre	Angela Schug		-	178	178	42	178	-
IT - Remote Working Solution	Angela Schug		-	180	180	41	50	£110k in total for two councils. The firewall capability from the Microsoft 365 project has been utilised for this enabling overall savings on the project.
Waste Vehicles	Simon Phelan		421	-	421	662	662	Additional vehicles delivered in October.
Waste Depot	Simon Phelan		3,141	1,124	4,265	14	14	Planning permission now secured. Work on site unlikely to commence until March 24.
Wheeled Bins Purchase	Simon Phelan		175	-	175	73	191	Updated forecast from our contractor/supplier given full picture from last year and projected property growth.
Total Provisional Projects			4,500	1,300	5,800	0	0	
Total Approved Projects			7,709	6,839	14,548	9,606	13,693	
GRAND TOTAL			12,209	8,139	20,348	9,606	13,693	

Performance Dashboard Overview

3.30. This report includes Delivery Measures which are used to assess performance against the Councils Delivery Plan throughout the year. At the end of December 2023, the measures were rated using two methods. Performance against target is assessed as green for meeting or exceeding the target, amber when the target has not been met but within the set tolerance and red when performance has dipped below an unacceptable level and remedial action is required. Secondly, performance is assessed as to whether the performance is improving or declining based on looking at previous quarterly or yearly results. The latter gives an indication to whether light touch monitoring is required.

Performance Against Target

Green	18
Amber	5
Red	3

Direction of Travel

Improving ↑	12
Static ↔	2
Declining ↓	12

Performance exceptions

3.31. Off target Measures: close monitoring

Measure	Q2 Outturn	Q3 Outturn	Target	Status	Direction of Travel
<i>Consolidated demand on housing including homelessness prevention work and housing register (Measure reference 20)</i>	1,930 (cumulative)	2,774 (cumulative)	1,645	Red	↓

Measure Owner: Mike Pursehouse, Assistant Director – Individuals & Families

- **Description of the performance this quarter:** Demand on the housing services remains high however this quarter did see a reduction in total demand to 844 from 1046 in the previous quarter. This is expected as Christmas, and the run up to Christmas often results in fewer family breakdowns. The total demand however still remains significantly above the full year target of 1645 as people continue to face a reducing private rental sector and household affordability issues.
- **Potential Implications:** The team is managing at present although the demand on the housing register for lower need remains a concern as those facing homelessness from private rental continue to face no other option than falling back upon the social rented sector thus reducing move on options for those now unsuitably housed within their housing (for example overcrowded).
- **Action to be taken:** A workstream regarding managing the sustained increase demand from private rental sector (PRS), and the reducing capacity for PRS to be utilised as a prevention/sustainable home option will be forthcoming to cabinet within the next quarter.

Measure	Q2 Outturn	Q3 Outturn	Target	Status	Direction of Travel
<i>External Funding to support growth (Measure reference 14)</i>	£78,195 (cumulative)	£123,323 (cumulative)	Significant Investment	Red	↓

Measure Owner: George Denton, Assistant Director – Economic Growth

- **Description of the performance this quarter:** : £32,586 has been secured to support the from Pride in Place work programme. Successful recipients included The Bircham (Reepham) and Hellesdon Community Centre. £90,737 has been secured from private sector funding to support the Rural Business Builder programme.

- **Potential Implications:** The level of external funding secured is proportional to the delivery of outputs and outcomes delivered.
- **Action to be taken:** Work is ongoing to identify and secure external to supplement the delivery of the Economic Strategy

Measure	Q2 Outturn	Q3 Outturn	Target	Status	Direction of Travel
<i>Staff retention (Measure reference 5)</i>	7.98% (cumulative)	11.73% (cumulative)	90% retention or 10% turnover	Red	↑

Measure Owner: Emma Hodds, Chief of Staff

- **Description of the performance this quarter:** The quarterly total turnover figure for Q3 was 2.88%, which is a decrease of 1.45% compared to Q2. For Q3 turnover reduced significantly which is really encouraging, this brings our rolling 12-months average turnover to 3.75%. If our turnover maintains at this level throughout Q4, our cumulative turnover figure would be 15.48%. This is above the target of 10% but an improvement on last year's total turnover over which was 18%.
- **Potential Implications:** Following the launch of our new Exit Interview process we now have much better-quality feedback to work with. We have received an 85% completion rate of our exit interviews in Q3.
- **Action to be taken:** The HR Team continues to support managers with reducing their turnover using exit interview feedback and continuous coaching through the employee cycle. Feedback from the staff opinion survey well will inform action plans to take forward with individual areas.

Measure	Q2 Outturn	Q3 Outturn	Target	Status	Direction of Travel
<i>Collection rate of Council Tax (Measure reference 7)</i>	55.12% (cumulative)	81.93% (cumulative)	98%	Amber	↓

Measure Owner: Rodney Fincham, Assistant Director – Finance

- **Description of the performance this quarter:** The collection rate for quarter 3 of 81.93% is 0.56% below the quarter 3 performance in 22/23. A drop in collection was expected as we implemented the Civica Revenues Benefits system in December, which resulted in 4 weeks of downtime during the conversion and court recovery work having to be suspended.
- **Potential Implications:** Increased customer contact, staff resources to deal with workload and to resume recovery timetable in Q4.
- **Action to be taken:** We are working with the supplier to resolve issues, and the team are working extra hours to catch up with the work.

Measure	Q2 Outturn	Q3 Outturn	Target	Status	Direction of Travel
<i>Collection of Business Rates (Measure reference 8)</i>	58.40% (cumulative)	82.87% (cumulative)	98%	Amber	↓

Measure Owner: Rodney Fincham, Assistant Director – Finance

- **Description of the performance this quarter:** The collection rate for quarter 3 of 82.89% is 2.15% below the quarter 3 performance in 22/23. A drop in collection was expected as we implemented the Civica Revenues Benefits system in December, which resulted in 4 weeks of downtime during the conversion and court recovery work having to be suspended.
- **Potential Implications:** Increased customer contact, staff resources to deal with workload and to resume recovery timetable in Q4.
- **Action to be taken:** We are working with the supplier to resolve issues, and the team are working extra hours to catch up with the work.

3.32. Off target measure: light touch monitoring

These measures did not meet their target by minimal amounts and light touch monitoring is in place.

Measure	Q2 Outturn	Q3 Outturn	Target	Status	Direction of Travel
Customer satisfaction survey (%) (Measure reference 2)	61.14% (cumulative)	60.42% (cumulative)	65%	Amber	↓
Percentage of Percentage of food businesses with food hygiene ratings of rated 4 (Good) and 5 (Very Good) (Measure reference 26)	97% (average)	97% (average)	98%	Amber	↔
Percentage of fly tips removed within 1 working day (Measure reference 34)	92% (average)	92% (average)	100%	Amber	↑

On target measures

Measure	Q2 Outturn	Q3 Outturn	Target	Status	Direction of Travel
Progress towards delivery of the predicted £8.6m savings through the South Norfolk/Broadland collaboration (Measure reference 1)	£61,289,213 (cumulative)	£2,046,319 (cumulative)	£8.6m over 5 years	Green	↑
Staff satisfaction (Measure reference 3)	67% (cumulative)	70% (cumulative)	Continual improvement	Green	↔
Staff absence levels – working days lost to short term sickness per FTE (Measure reference 4)	2.07 days (cumulative)	3.17 days (cumulative)	4.5 days	Green	↑
Percentage of the organisations workforce who are apprentices and graduate entry roles (Measure reference 6)	2.4% (average)	2.8% (average)	2.4%	Green	↑
Percentage of vacant retail space in market towns (Measure reference 12)	8.09% (Quarter end)	6.94% (Quarter end)	Less than 8%	Green	↑
Number of residents accessing support via the Help Hub (Measure reference 15)	1884 (cumulative)	3005 (cumulative)	3,500	Green	↓
Number of residents supported to live independently (Measure reference 18)	410 (cumulative)	601 (cumulative)	700	Green	↓
Delivery of housing standards enforcement (Measure reference 19)	50 (cumulative)	68 (cumulative)	75	Green	↓
Percentage successful intervention to prevent or relieve homelessness for customers who are homeless or at risk of becoming homeless (Measure reference 21)	92% (average)	91% (average)	80%	Green	↓
Number of working days taken to process new claims for Housing Benefit/Council Tax benefit (Measure reference 22)	5 (average)	6 (average)	7	Green	↓

Measure	Q2 Outturn	Q3 Outturn	Target	Status	Direction of Travel
<i>Number of affordable homes delivered (including help to buy) (Measure reference 23)</i>	130 (cumulative)	242 (cumulative)	Sufficient housing	Green	↓
<i>Percentage of planning decisions made within statutory timescales – minors/others (Measure reference 25)</i>	86% (average)	90% (average)	80%	Green	↑
<i>Percentage of planning decisions made within statutory timescales - householders (Measure reference 25)</i>	86% (average)	90% (average)	80%	Green	↑
<i>Percentage of planning decisions made within statutory timescales - majors (Measure reference 25)</i>	96% (average)	94% (average)	80%	Green	↓
<i>Participation levels in household food waste recycled (Measure reference 27)</i>	79.51% (snapshot)	80.31% (Snapshot)	Increase by 2%	Green	↑
<i>Percentage in household waste recycled (Measure reference 28)</i>	57% (average)	n/a	Increase by 2%	Green	↑
<i>Participation levels in garden waste service (Measure reference 29)</i>	35003 (snapshot)	35398 (snapshot)	35,100	Green	↑
<i>KGs of residual waste collected per household (Measure reference 29)</i>	194.76kg (cumulative)	n/a	Decrease of 10Kgs	Green	↑

Strategic Risk Dashboard

- 3.33. During Q3 23/24, the CLT have reviewed and updated the Strategic Risk Register (SRR) to ensure we are managing the risks effectively and that we are taking the right action to prevent the risk from escalating and ultimately reduce the risk where possible. As part of reviewing the register, CLT take into consideration:
- Whether risks are still relevant
 - Any emergent risks which have been identified
 - Whether the likelihood and impact of risks has changed
 - Whether controls which are in place are still effective
- 3.34. As part of our ongoing continuous improvements to the way we manage and report risk, CLT have reviewed the format of the strategic risk register and have now included columns showing Inherent Risk as well as Mitigated Risk. This is to support Members and Staff to fully understand the impact of our mitigating actions and to ensure that we are able to track progress of the risk through its lifecycle. This was taken recently to Audit Committee for review.
- 3.35. Inherent Risk - we will now be using the first risk score in the register to score the inherent risk to the organisation. This is the score which reflects the natural risk level in an environment where the risk has not been controlled or new/additional mitigating actions taken. This score can change over time if the inherent risk changes e.g., the external environment changes.
- 3.36. Mitigated Risk (current risk) score will be used to reflect how effective the mitigating actions have been on the inherent risk. This score should be lower than the inherent risk if the mitigating actions are effective.

3.37. Since the risk register was last seen by the committee, no new strategic risks have been identified.

3.38. Two strategic risks have had their scores reduced. These are:

- BDCM4: Ambitions in the Delivery Plan do not match the capacity of the organisation - The likelihood of occurrence has reduced as we begin to progress the mitigating actions owned by the Project Management Office.
- BDCP3: Implications arising from the Government’s Resources and Waste Strategy and the Environment Act 2021 - In October the Government published the response to the Consistency in Collections consultation which included that Local Authorities could continue to charge for garden waste collections, and from April 2026 all Local Authorities will receive revenue funding to meet the cost of providing a weekly food waste service. This has reduced the likelihood and impact scores of this risk.

3.35. The below heatmap provides an overview of the current risk register with the risks which are being managed at a strategic level. A full version of the Strategic Risk Register can be found in appendix 3, alongside a summary of the key changes to the risks since the last committee meeting.

Risk Scoring Matrix		1	2	3	4	5
		Insignificant	Minor	Moderate	Significant	Severe
5	Expected					
4	Highly Likely				BDCP3 – Government’s Waste Strategy (risk reduced)	BDCM5 – Cyber attack (no change)
3	Likely				BDCM2 – Reform and Devolution (no change) BDCM4 - One Team Capacity and Capability (risk reduced)	
2	Not Likely					BDCM1 – Financial (no change) BDCS13 – Housing demand (no change)
1	Rare					

4. Proposed action

4.1. Cabinet is asked to endorse the contents of this report and agree the recommendations.

5. Other options

5.1. None applicable to this report.

6. Issues and risks

- 6.1. **Resource Implications** – the finance section of this report provided an overview of the finance resource implications for this quarter.
- 6.2. **Legal Implications** – no implications.
- 6.3. **Equality Implications** – no implications.
- 6.4. **Environmental Impact** – no implications.
- 6.5. **Crime and Disorder** – no implications.
- 6.6. **Risks** – Operational risks to the delivery of our Delivery Plan are managed within directorates. The organisation is currently developing a strategic risk register where strategic risks will be managed.

7. Conclusion

- 7.1. The report has provided an overview of the position of the Council for performance, risk and finance for Q3 2022/23.

8. Recommendations

1. To endorse the revenue and capital position for quarter 3 (variance details in Appendix 1).
2. To endorse the Quarter 3 2023/24 performance (detailed in Appendix 2).
3. To endorse the current position with respect to risks and agree the actions to support risk mitigation (detailed in Appendix 3).
4. To agree to purchase a further £49,900 £1 shares in Broadland Living to bring the total equity investment to £50,000.

Appendix 1

Chief of Staff	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000	Explanation of significant variances
Executive Team	396	396	332	407	-11	Additional meeting room connectivity and Disability Discrimination Act compliance costs. Additional costs Local Government Association conference costs.
Chief of Staff	45	44	37	44	0	-
Governance	894	899	549	839	60	£68k New burdens funding received to offset running costs.
Electoral Services	54	54	261	46	9	Savings on elections canvassing agency staffing.
Marketing & Comms	372	374	245	331	43	Contracted Services expected to be higher.
Internal Audit	63	63	39	66	-3	
Human Resources	504	508	282	531	-23	Job advertising savings, offset by other various costs. Savings on training costs will be offset by new Learning and Development software.
Apprentices	245	260	201	277	-18	Additional apprentice staffing costs.
	2,573	2,598	1,947	2,541	57	

Finance & Corporate Costs	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000	Explanation of significant variances
Corporate Costs	1,338	1,154	794	1,157	-3	-
Finance & Procurement	445	452	447	494	-42	Agency costs to cover Finance vacancy, and additional support for Financial Transactions Team due to volume of work.
Council Tax	404	421	496	482	-61	Agency costs to support system change and cover vacancies. Reduction in income from court summons.
Business Rates (NNDR)	-54	-52	92	-42	-9	Agency costs to support system change and cover vacancies.
	2,132	1,975	1,828	2,091	-116	

Transformation & ICT / Digital	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000	Explanation of significant variances
IT & Digital	1,347	1,350	1,041	1,444	-93	Higher usage expenditure than budgeted for on data and mobile phones. Data line costs are higher than expected due to increased resiliency requirements. Additional firewall costs of £14.5k. Unexpected software costs relating to retaining the Revenues and Benefits system beyond the new system consolidation, upgrades to Pay360 and one-off costs to continue with Arbitas. Ongoing vacancies will provide savings of £87k.
Strategy and Transformation	402	274	274	365	37	Salary savings from transformation team restructure.
<i>Transformation – Future Council Fundng</i>	-	-	-730			<i>Expenditure fully funded from Government grant for pilot programme.</i>
Customer Services	289	293	177	229	64	Salary savings from team vacancies.
Facilities	454	457	706	530	-74	Thorpe Lodge was budgeted for 6 months as an unoccupied building, however occupancy continued for another 2 months until the end of May for which SNC have been recharged their share. This led to higher costs such as utilities, maintenance and rates together with an ongoing holding cost which will continue until the disposal of the building. A shortfall in income in relation to rental at the Horizon Centre is anticipated to be £26K.
	2,489	2,502	1,468	2,568	-66	

Economic Growth	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000	Explanation of significant variances
Economic Growth	654	657	592	493	164	There is a net £104k saving on staffing, due to an establishment post being funded by a project and savings in vacancy turnover/reduced hours.
Property	0	0	775	-3	3	
Car Parking and Public Conveniences	129	129	145	163	-34	Increased utility expenditure in public conveniences and increased costs for car park maintenance.
Community Assets	321	324	233	266	58	No increase for Bure Valley Railway rental. The company are taking on maintenance costs. An electricity rebate has been received for Hellesdon street lighting.
	1,105	1,110	1,745	919	191	

Regulatory	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000	Explanation of significant variances
Community & Environmental Protection	409	412	384	482	-70	Agency staff costs for the interim Environmental Protection Manager have been incurred. Works in default costs have been incurred on the Thorpe Island sewage pipe. Some of these may be recovered from the landowner in the future.
Food Safety & Licensing	105	135	-1	21	114	One off Private Hire licensing income means that income has exceeded expectations.
	514	547	383	503	44	

Planning & Business Support	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000	Explanation of significant variances
Planning	466	479	464	547	-68	Some planning non-pay savings have been achieved but additional costs have been incurred on agency staff to cover vacancies. Planning fee income is currently forecast to not reach budgeted levels, but the lower fee income has been partially offset by additional Planning Performance Agreement and Government grant income. Design Code preparation work has been delayed so that budget will need to be carried forward to 24/25. Some Neighbourhood Plan costs have been delayed until 24/25.
CIL	-371	-370	-280	-370	0	
Building Control	38	38	32	38	0	
Business Support	78	86	122	137	-51	There are vacancies within the team which are unlikely to be filled in the short term. These savings are offset by lower land charge income caused by the downturn in the housing market.
	212	234	338	352	-119	

Individuals & Families	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000	Explanation of significant variances
Leisure Community Development	0	5	0	0	5	
Communities & Help Hub	475	558	394	557	1	
Communities & Help Hub - External	0	9	-175	0	9	Funding confirmed to cover salary uplift.
Housing Standards & Independent Living	288	294	216	309	-15	Correction of BDC Handy person post to BDC only.
Housing Standards & Independent Living - External	0	0	-35	0	0	
Partnership and Innovation	56	58	43	58	0	
Partnership and Innovation – External	0	0	-224	0	0	
People from Abroad Programme – External	0	3	-473	0	3	
Benefits & Housing	786	816	698	822	-6	The overspend is predominantly due to the cost of the agency staff required to manage the ongoing demands of processing the Housing Register applications.
Benefits & Housing – Accommodation	154	154	366	212	-58	At the end of Q2, the forecast expenditure on spot purchased accommodation was expected to exceed budget by £173k., offset by the additional income received from private sector leased properties of £82k and the new Dereham Road properties that were forecast to provide a net income of £108k. Additional funding from the Homeless Prevention Grant of £143k was transferred (as permitted by the grant) to offset the further rise in temporary accommodation costs which are now forecast to exceed budget by £351k.
Benefits & Housing - External	0	4	25	18	-15	Increased Spot purchased accommodation for rough sleepers, as funding accounts for up to 7 rough sleepers being accommodated. Current figure is 17.
	1,759	1,901	835	1,977	-76	
Housing Benefit Payments	-91	-91	141	-91	0	

Community Services	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000	Explanation of significant variances
Waste Management	318	327	268	324	3	
Waste	1,789	1,599	1,441	1,840	-241	Additional waste costs of £26k because of the Coronation bank holiday; additional container management costs of £139k (subject to challenge); an allowance for contractual property count uplift of £33k, £50k matched funding costs for hydrotreated vegetable oil as set out in the Veolia contract and £52k costs for additional collections
Recyclable Waste	1,047	1,069	919	1,045	24	The overall tonnage expected to be collected this year has been reduced from 13,000T to 11,700T, resulting in a saving of £97.5k from disposal costs, and reduced recycling credit income by 64.4k, giving a net saving of £33k. The corrected property count number increased the contract cost by £9k.
Garden Waste	-1,855	-1,810	-1,902	-1,781	-28	The service will miss its increased subscription income target by £28k, however a small increase in disposal tonnage has provided an additional net income of £8k, but additional contract costs, for recovery of bins from ended subscriptions, of £8k .
Food Waste	352	397	854	397	0	
Street Scene	498	540	438	526	14	Additional income, as a result of recovery of disposal costs for fly tips, from Norfolk County Council.
Recycling Strategy	84	121	100	147	-26	Within the Recycling Strategy team, additional costs due to approved growth (Strategy Manager - approved cabinet Feb 23), maternity costs, and additional Norfolk Waste Partnership costs (£19k).
	2,231	2,242	2,119	2,498	-257	

Appendix 2

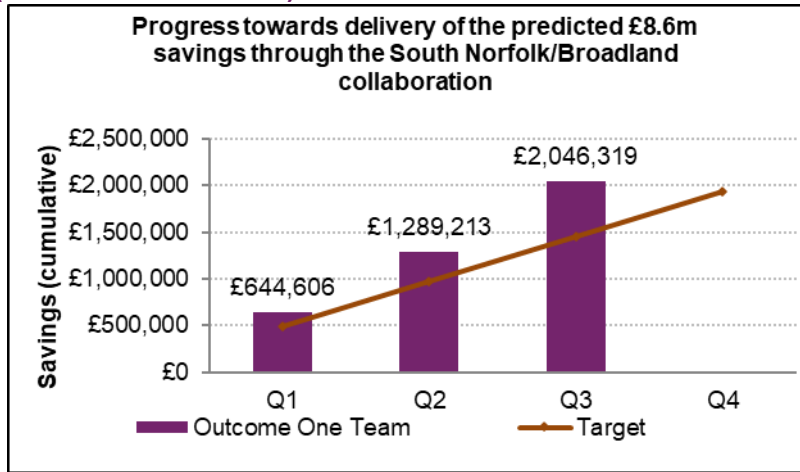
Broadland District Council – Delivery Measure Performance for Quarter 3 2023/24

Appendix 2 provides a detailed overview of the performance of the Council against its Delivery Plan.



Progress towards delivery of the predicted £8.6m savings through the South Norfolk/Broadland collaboration

(Measure reference 1)



End Success Target: £8.6m savings over 5 years

COMMENTS

Measure Owner: Rodney Fincham

Portfolio Holder: Cllr Steve Riley

Description of the performance this quarter: In 2018, the Council agreed to the joint Feasibility Study, which began the collaboration between Broadland and South Norfolk. The Feasibility Study set out an indicative cumulative savings forecast of £8.6m over a five-year period.

The current five-year saving forecast for the collaboration is £8.5m, this saving is split 45/55 (BDC/SNC). The figure net of one officer team transitional costs is £7.235m - One Team transitional costs were charged to the relevant Council.

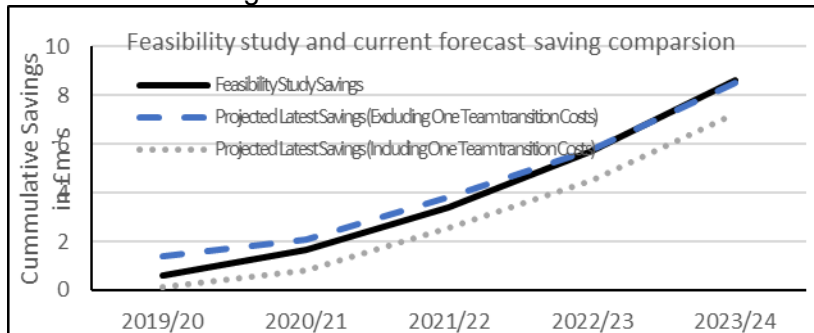
Some of the one officer team savings were delayed, due to the impact of the Covid-19 pandemic. However, we are still on track to deliver annual savings of £2.6m a year by year 5.

RISKS

The identification of savings becomes increasing difficult over time, once the transformation of our processes, procedures and the way we work has been carried out.

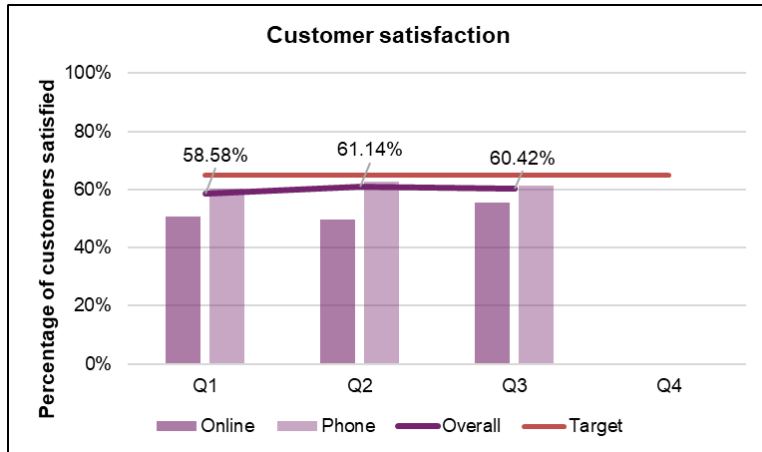
CONTEXT

The table on the right shows the cumulative breakdown of the savings forecast by area:



	2019/20 £'000	2020/21 £'000	2021/22 £'000	2022/23 £'000	2023/24 £'000
Senior Management	571	1,088	1,605	2,121	2,638
One Joint Officer Team	884	2,454	3,579	4,872	6,919
Contracts / Procurement	0	0	80	240	405
ICT Infrastructure Costs	0	-1,394	-1,394	-1,394	-1,394
Transition Costs	-69	-69	-69	-69	-69
	1,385	2,079	3,802	5,771	8,500
One Team transition costs	-1,265	-1,265	-1,265	-1,265	-1,265
	120	814	2,537	4,506	7,235

A Customer satisfaction (Measure reference 2)



End Success Target: 65%

COMMENTS

Measure Owner: Corinne Lawrie

Portfolio Holder: Cllr Dan Roper

Description of the performance this quarter: This measure focuses on overall satisfaction of our communication channels as part of our programme of work to deliver a First-Class Customer Service. In Q3, we implemented our new telephony system and alongside this took the opportunity to review our Customer Satisfaction Survey. In November, we soft launched our new online survey, this appears on our website homepage. Development work is taking place to add in an automated pop up to invite customers to complete the survey. Work is currently taking place to launch the survey on our telephony system, and we expect this to be completed by the end of February.

In Q3 we received a total of 384 responses (321 phone, 63 online) with an overall satisfaction rating of 60.4%. There is a reduction of responses when compared to the previous quarter due to the switch over of the phone system and the online survey being amended and launched in November of Q3.

Out of 384 responses:

- 232 customers were satisfied (197 phone, 35 online).
- 131 customers were dissatisfied (107 phone, 24 online).
- 21 customers were neither dissatisfied nor satisfied (17 phone, 4 online).

Potential implications: Across both of our online and phone surveys we are performing below our target. There could be a risk that we could see increased demand through our telephony channel if customers are unable to find the information through our website. This demonstrates the importance of the work we have recently commissioned relating to First Class Customer Service specifically looking at people, process and technological improvements to enhance the customer experience and drive efficiency.

Action to be taken:

- Online survey to be developed to automatically pop up on the website during the customers navigation.

- Following the full implementation of the improved surveys, Customer Experience and Insight Lead to provide survey results to service areas monthly with detailed response data to enable service improvements.
- Explore the opportunity to gain customer service accreditation as part of the First-Class Customer Service programme.
- In Q4, more enhanced data on why customers were dissatisfied with the service areas will be provided in this report.
- Customer Experience and Insight Lead to work with the services who are seeing a high percentage of abandoned calls to help make changes to improve these for Q4.

RISKS

If the online customer journey does not meet customer expectation, we are unlikely to see an increasing demand down our telephones which is a more costly service.

CONTEXT

Telephone Customer Satisfaction Survey

- In Q3, the telephone customer satisfaction survey was only live in October due to the implementation of the new telephony system. Work is underway to get the survey live on the new system by the end of February.
- Our overall satisfaction rating for October on our phone survey was 61.37%.

Online Customer Satisfaction Survey

- In Q3, our overall satisfaction rating for our online survey was 55.56%.

Abandonment Rates

- The abandonment rate on our Contact Centre lines continued to remain low in Q3 (6%), this was a 1% decrease compared to Q2. This is within the green rating.
- The abandonment rate on our Call Queue lines in Q3 was 13%, this was a 3% increase compared to Q2. This is within the amber rating.



Staff satisfaction (Measure reference 3)



Year End Success Target: Continual Improvement

COMMENTS

Measure Owner: Emma Hodds

Portfolio Holder: Cllr Dan Roper

Description of the performance this quarter: The annual measure is aimed at looking at the progress towards our ambition to be an employer of choice. The 2023 engagement survey took place between 30 October – 29 December 2023. 74.6% of One Team completed the survey which is an increase of 25% from 2022. 2023 survey saw an increase in overall staff engagement to 69% (from 67% in 2022) based on average scores over 26 questions asked. The survey responses indicate a good level of engagement both in terms of completion which provides a majority perspective on questions asked and a good level of engagement across One Team. Focus areas will be identified so we can continue to increase this engagement score over the coming months into next year. It was very encouraging to see the top five positive responses across the Council's related to line managers and working environment:

- I am trusted by my line manager to manage my own workload.
- I understand what my line manager expects of me.
- I have not experienced bullying, harassment or discrimination within the last 12 months.
- I feel valued by my line manager.
- My line manager supports me with my wellbeing.

Potential implications: Areas with a lower satisfaction score included retention of staff, career progression and senior management decision making and impact.

Action to be taken: The results of the engagement survey will be communicated via local teams and actions plans put in place to focus on the lower scoring satisfaction scores / areas that teams would like to see improvement. Feedback from the Horizon survey will be shared with the Horizon project team for review and action.

RISKS

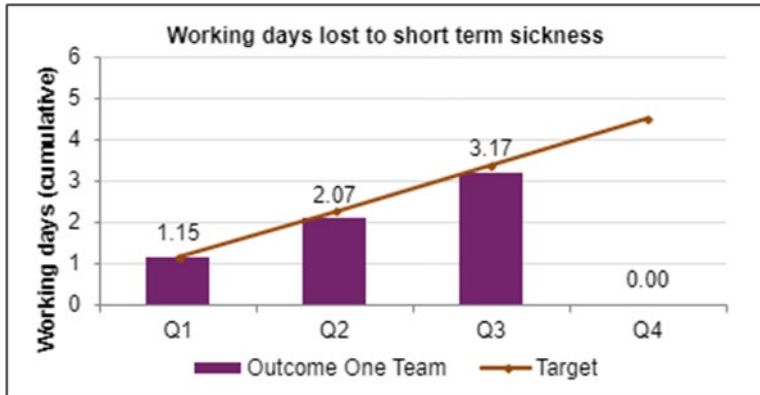
Ability of all employees to partake in engagement survey outcome cascade such as unconnected or community-based colleagues, this risk has been mitigated by cascading the feedback via local teams to communicate as part of regular and ongoing conversations.

CONTEXT

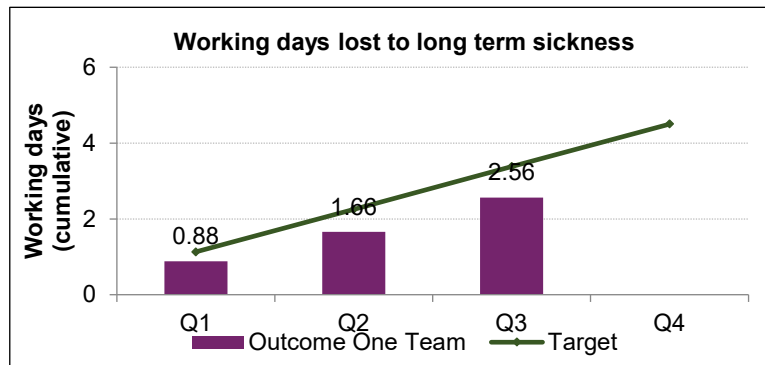
We have seen an improvement in 2023, in engagement, both in terms of number of respondents completing the survey and an improvement to the employee engagement score.

Horizon survey: 46.3% of respondents of the engagement survey completed the Horizon survey (not all respondents from the engagement survey regularly use the Horizon Centre such as Leisure & Depot colleagues). 67% of respondents are satisfied (strongly agree/agree) with the working environment at Horizon. 58.8% prefer working in Horizon to previous buildings with positive feedback including appreciation for the modern office environment and facilities. Cleanliness, noise levels and ability to sit with teams were recurring themes for improvement.

 **Staff absence levels – working days lost to short term sickness per FTE (Measure reference 4)**



Year End Success Target: 4.5 days



COMMENTS

Measure Owner: Emma Hodds **Portfolio Holder:** Cllr Dan Roper

Description of the performance this quarter: For Q3, short term absence rate sits at **1.10** working days lost per FTE. For Q2 this was 0.92 days, which means short term absence has increased by this quarter of **0.18** days. Based on the average levels over the year, it is likely we should remain within the tolerance target for Q4.

In comparison, long terms sickness absence has also slightly increased in Q3 with **0.90** days lost per FTE, compared to **0.78** days last quarter. Long terms sickness is also on track to remain within target for Q4.

Potential implications: We saw an increase in Covid-19 in Q3, making up 12.5% of the Q3 short term absence. Gastro-Intestinal and Respiratory were the other main contributors to short term absence (28%), this is not unusual for the time of year. With long-term absence in Q3, Mental Health Illness is biggest outlier, increasing to 31% of long-term absence days lost this quarter. Musculo Skeletal long-term absence reduced to 10% which is a significant improvement on last quarter which was 23.24%.

As mentioned in previous reports, Mental Health continues to be a key concern locally and nationally. Mental health UKs 2023 Annual report shows over a third of adults experienced high or extreme levels of pressure and stress always or often in the past year, the report warns that the UK is at risk of becoming a ‘burnt-out nation’.

Action to be taken:

Focus on our highest causes of absence continues. Our Assistant Business Partners work closely with managers to support staff on an ongoing basis to prevent long term sickness occurrences and enable swift returns to work.

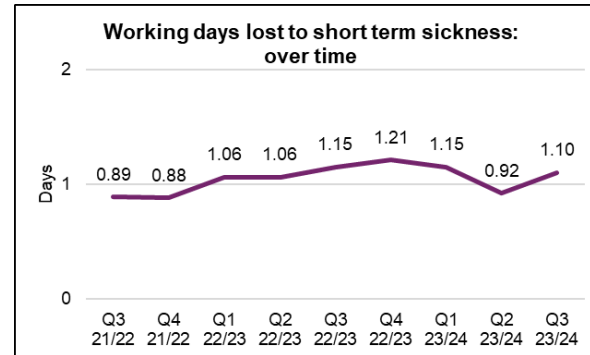
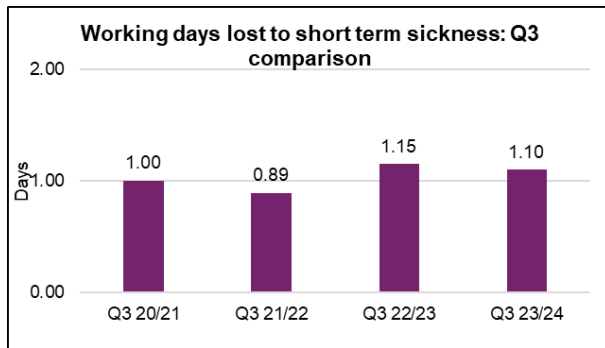
Other support available to help with reducing sick absences includes:

- Occupational Health Support
- Employee Assistance Programme
- Bespoke manager training
- Tailored mental health initiatives such as Lions Barbershop Initiatives
- Private counselling
- Private Menopause support via Spire Clinic
- Physio Support

RISKS

The main risk with sickness is repeated absence which puts pressure on teams, which can in turn impact on service delivery and in turn customer satisfaction, This is mitigated through the careful and active management of both long-term and short-term sickness levels along with a more focussed approach working with our occupational health provider

CONTEXT

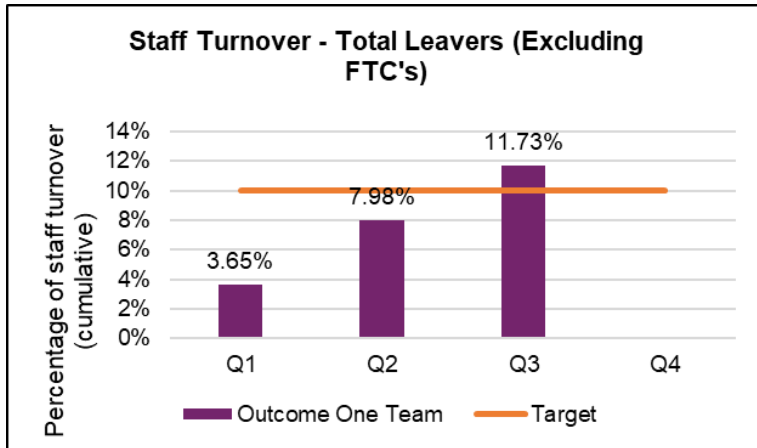


The national average sickness days lost per FTE in the UK sits at 7.8 according to CIPD, which gives reassurance that our own absence is relatively low and managed well.

Whilst our total days lost to sickness have slightly increased, our days lost to some of our highest concerns in recent months, such as Musculo-skeletal issues has reduced, and people are returning from mental health absence much sooner. This a positive indication that the actions we have put in place is taking the effect.

The 2023 CIPD Health and Wellbeing report highlights that across the UK, our managers have a significant impact on our mental health at work, this could be how different management styles affect us or how well we are supported when we are struggling. We are currently designing our new Management Development program which will include specific training on supporting team members with mental health issues.

R Staff retention (Measure reference 5)



Year End Success Target: 90% retention (10% turnover)

COMMENTS

Measure Owner: Emma Hodds

Portfolio Holder: Cllr Dan Roper

Description of the performance this quarter: The graph to the left shows staff retention in the form of turnover. The quarterly total turnover figure for Q3 was 2.88%, which is a decrease of 1.45% compared to Q2. The cumulative turnover figure for Q1, Q2 & Q3 is 11.73%.

2.69% of this was voluntary turnover, which means those who resigned from their post and chose to leave, the remaining 0.19% left us for other reasons such as dismissal and redundancy.

For Q3 turnover reduced significantly which is really encouraging, this brings our rolling 12-months average turnover to 3.75%. If our turnover maintains at this level throughout Q4, our cumulative turnover figure would be 15.48%. This is above the target of 10% but an improvement on last years total turnover over which was 18%.

Q3 Turnover Breakdown	Oct	Nov	Dec	Total
Total turnover rate % (Excluding FTC's*)	1.05	0.57	1.26	2.88
Voluntary turnover rate % (Resignations)	0.86	0.57	1.26	2.69

*Excluding Fixed Term Contracts

Potential Implications: Exit interviews completion has risen again in Q3 to 85%. A breakdown of what leavers told us they liked and disliked about the One Team is below:

Positives feedback themes:

- The flexible approach to working is really beneficial to work life balance
- People like the new office and felt it is a relaxed and engaging working environment
- People valued their relationships with colleagues and felt they had a bond through a sense of shared purpose.
-

Potential areas to review:

- Some leavers didn't like the desk booking arrangement (not always able to sit with colleagues they work closely to and the nature of some teams work can be noisy)
- Some leavers felt their can be miscommunication from management, this is more relevant in operational areas with multiple managers across teams.
- Some leaver found the IT systems and remote working challenging

Action to be taken: The HR Team continues to support managers with reducing their turnover using exit interview feedback and continuous coaching through the employee cycle. Feedback from the staff opinion survey well will inform action plans to take forward with individual areas.

As detailed in last quarters update, the labour market remains very tight and we are one of the many employers trying to position ourselves better and improve retention by upskilling existing staff and raising wages. We are hopeful that the recent pay award and pending move to a pay progression model, will help us with our retention.

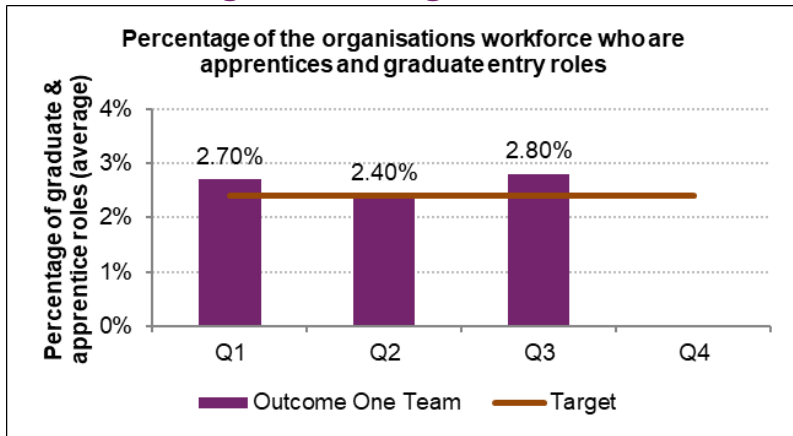
RISKS

The risk being reduced service capabilities due to a reduction in staffing levels and/or difficulties in filling vacancies due to increased competition nationally. To mitigate this risk, more innovative places and methods of recruitment are being utilised, along with an improved induction process to increase retention, particularly in the first year of employment

CONTEXT

In the immediate aftermath of the Covid pandemic, a collective revaluation of the workplace coupled with a tight labour market triggered what many dubbed the 'Great Resignation'. The national picture continues to reflect this trend with employee turnover across all sectors increased markedly again in 2022. The latest data from Cendex shows 16.4 per cent of UK employees resigned in 2022, a noticeable increase on the 9.6 per cent voluntary resignation rate in 2021, and one that pushed the total labour turnover rate to 22.5 per cent, compared to 14.6 per cent in 2021. Other councils do not report on this measure, so it is difficult to source comparison data. However, the CIPD Spring 2022 Market Outlook report the labour market continues to be tight which will undoubtedly affect how well organisations can retain talent. The report says "under-pressure public sector employers are more likely to be struggling to find the staff they need to deliver public services, with more than half (52%) reporting hard to-fill vacancies.

G Percentage of the organisations workforce who are apprentices and graduate entry roles (Measure reference 6)



COMMENTS

Measure Owner: Emma Hodds

Portfolio Holder: Cllr Dan Roper

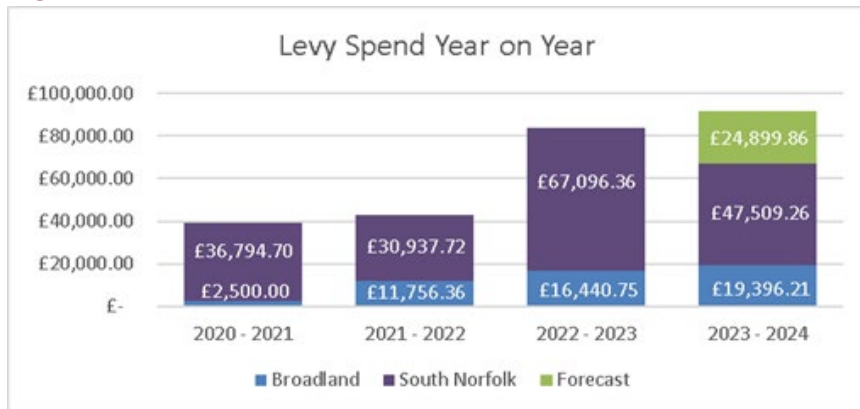
Description of the performance this quarter: For Q3, the percentage of the organisation’s workforce in apprenticeships or graduate roles sits at 2.8% of the organisation headcount, that is 25 apprentices and 2 graduates. This figure is above our target, resulting in green RAG status and an increase from Q2. We also have a further 9 officers undertaking an apprenticeship as professional development.

Potential implications : Whilst we have not had any levy funds expire this year, the risk of not reducing the levy balance may mean we see funds expire in future.

Action to be taken: To retain use of our full levy funding within Broadland and South Norfolk Councils we are looking to further reduce our levy balance through use of apprenticeships for officer career development where apprenticeship standards, location and timing of training matches the learning need.

Year End Success Target: 18 new apprentices (2.4% of the workforce)

CONTEXT



The Councils’ apprenticeship strategy and recruitment activity has continued to increase in order to fulfil our aims for providing career entry roles and developing a pipeline of talent into hard to recruit areas.

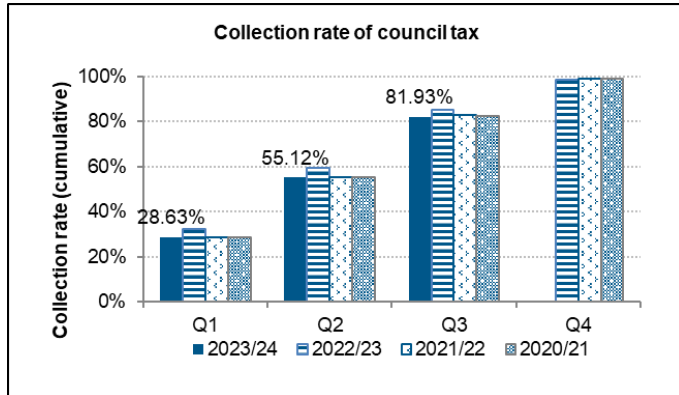
Spend of this year’s levy income has continued to increase for Broadland to 109% however for South Norfolk it has dropped to 80% due to forecasted levy payments moving into next quarter. Due to the income from previous years, despite increasing our total levy spend once again this year, we are forecasting to spend only 48% of our total balance over the next 12 months.

Forecasted remaining balance at year end:

- South Norfolk £130,897.04
- Broadland £36,826.02

It should be noted that the levy fluctuates monthly depending on the number of employees we have in the organisation and when we have new apprentices start and finish. The levy balances income against expiring funds, funds expire after 24 months.

A **Collection rate of Council Tax (Measure reference 7)**



Year End Success Target: 98%

COMMENTS

Measure Owner: Rodney Fincham

Portfolio Holder: Cllr Steve Riley

Description of the performance this quarter: The collection rate for quarter 3 of 81.93% is 0.56% below the quarter 3 performance in 22/23.

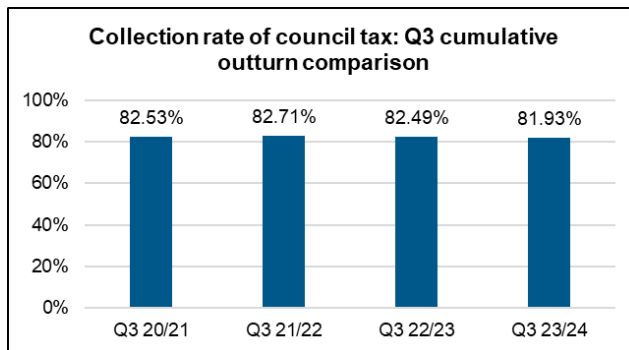
A drop in collection was expected as we implemented the Civica Revenues Benefits system in December, which resulted in 4 weeks of downtime during the conversion and court recovery work having to be suspended. Since the new system has gone live, we have had a number of implementation system issues.

Potential implications: Increased customer contact, staff resources to deal with workload and to resume recovery timetable in Q4.

Action to be taken: We are working with the supplier to resolve issues, and the team are working extra hours to catch up with the work.

RISKS

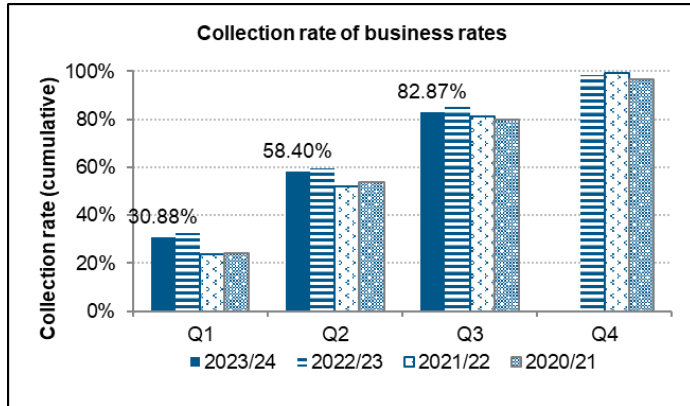
None this quarter.



CONTEXT

The graph to the left shows the Q3 collection rate in comparison to previous years.

A **Collection of Business Rates (Measure reference 8)**



Year End Success Target: 98%

COMMENTS

Measure Owner: Rodney Fincham

Portfolio Holder: Cllr Steve Riley

Description of the performance this quarter: The collection rate for quarter 3 of 82.89% is 2.15% below the quarter 3 performance in 22/23 but remains higher than Q3 in 20/21 & 22/23.

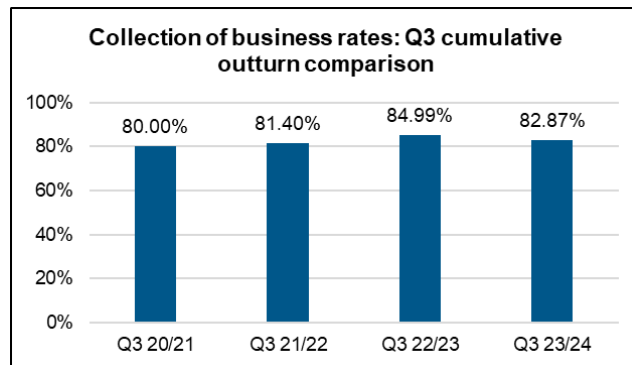
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Potential implications: Increased customer contact, staff resources to deal with workload and to resume recovery timetable in Q4.

Action to be taken: We are working with the supplier to resolve issues, and the team are working extra hours to catch up with the work.

RISKS

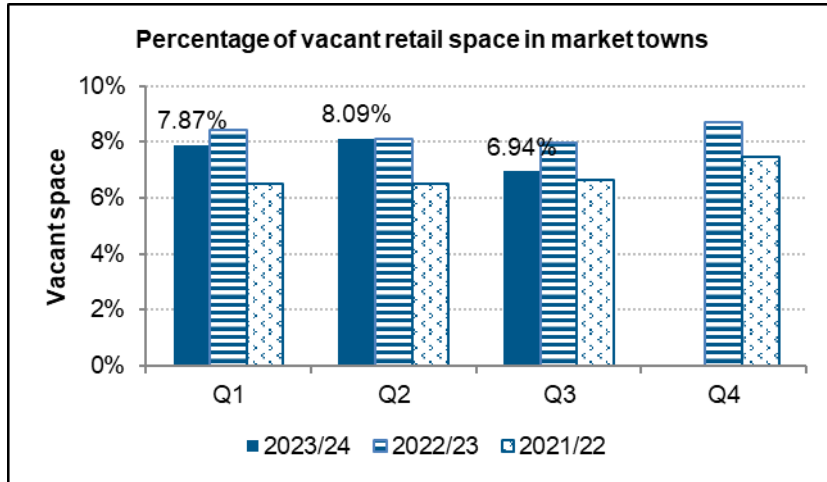
None this quarter.



CONTEXT

The graph to the left shows the Q3 collection rate in comparison to previous years.

G Percentage of vacant retail space in market towns (Measure reference 12)



COMMENTS

Measure Owner: George Denton

Portfolio Holder: Cllr Martin Booth

Description of the performance this quarter:

- There has been a reduction of two vacant units in the market towns across Broadland during Q3.
- The overall percentage vacancy rate reduced by 1.15% on the previous quarter end. Total retail unit vacancy rate across the three market towns of Acle, Aylsham and Reepham stood at just under 7% at the end of Q3.
- Across Q3 the net movement is that there was one less vacant unit in each of Aylsham and Reepham, and no change in Acle.
- Numbers of vacant units in each of Acle and Reepham are currently above pre-pandemic levels, and in Aylsham they are at the same level as four years earlier.

Potential implications: Note the improved situation in Aylsham and Reepham for the second quarter in succession.

Action to be taken: Continue monitoring the situation and use business newsletters to promote availability of units.

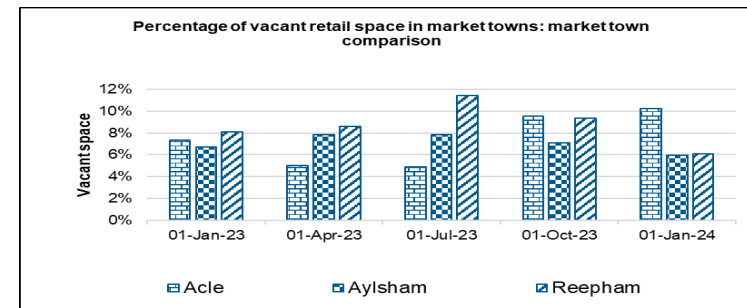
Year End Success Target: Less than 8% vacancy

RISKS - The true economic impact of the Covid pandemic and cost of living pressures may not yet be presenting itself in terms of vacant units. Retail rate discounts are in place and have increased from 50% to 75% in 2023/24 and will continue at this level again for 2024/25. Restrictions on retail and hospitality businesses have been fully removed but behaviour patterns of consumers formed during the pandemic may not return to their pre-pandemic levels

CONTEXT

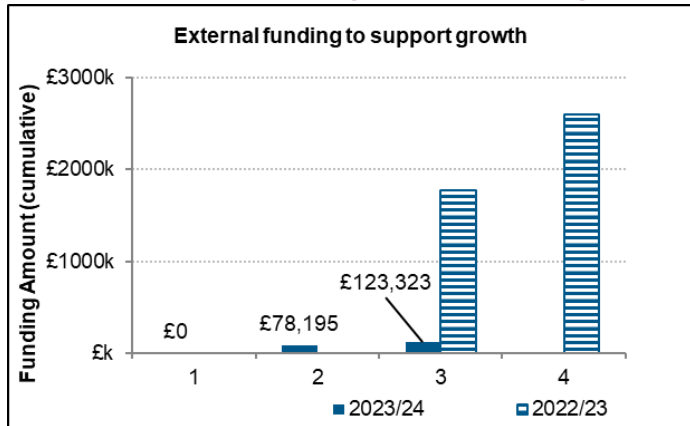
The calculations of vacant retail space are based on snapshots of the Business Rates database at each quarter end date. There may sometimes be a slight delay in retail units closing or being reoccupied and information being provided to, and records updated by the Business Rates team.

The Business Builder programme of business support, training, mentoring and grants opened in October 2022 to help support investment and growth in businesses. We are boosting the marketing of empty properties by featuring properties in our fortnightly newsletter to businesses.



R

External funding to support growth (Measure reference 14)



Year End Success Target: Significant investment to support the delivery of our key projects outlined in the Delivery Plan

COMMENTS

Measure Owner: George Denton

Portfolio Holder: Cllr Martin Booth

Description of the performance this quarter: £32,586 has been secured to support the from Pride in Place work programme. Successful recipients included The Bircham (Reepham) and Hellesdon Community Centre

£90,737 has been secured from private sector funding to support the Rural Business Builder programme.

Potential implications: The level of external funding secured is proportional to the delivery of outputs and outcomes delivered.

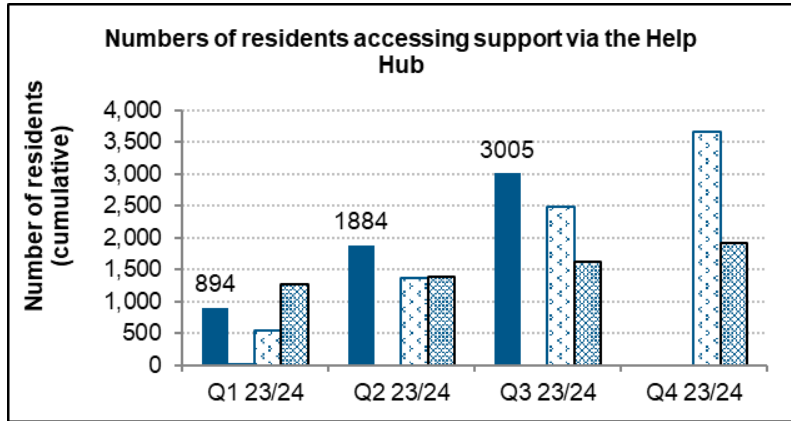
Action to be taken: Work is ongoing to identify and secure external to supplement the delivery of the Economic Strategy .

RISKS

Securing significant amounts of external funding continues to be a highly competitive process with no guarantees of success.

G

Number of residents accessing support via the help hub (Measure reference 15)



Year End Success Target: 3,500

COMMENTS

Measure Owner: Mike Pursehouse

Portfolio Holder: Cllr Natasha Harpley

Description of the performance this quarter: As expected, demand on Help Hub services continues to increase, led by increased public awareness of the service in Broadland as well as wider social issues, such as the cost of living. Projects such as Household Support Fund also increase the number of referrals into the service.

Potential Implications: Exponential increase in cases could place pressure on administrative elements of the Help Hub and could overwhelm end-point advice provision. This is not the case at this stage however, and the Sub-directorate is working to ensure that we have the staff resources in the right place to ensure we can maintain performance. We have planned in a wider review of demand in next financial year to understand our performance and demand which will be presented to Overview and Scrutiny.

Action to be taken: Continue to track demand and local and national trends.

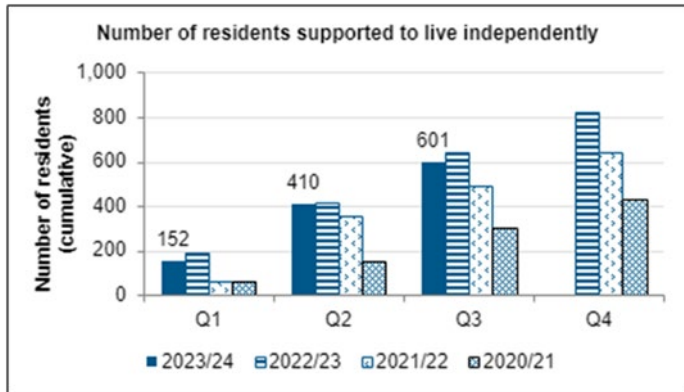
RISKS

Pressure from too many referrals could slow the administrative processes of the Help Hub and overstretch resource. This will be monitored, however is currently being coped with.

CONTEXT

Advice and support services locally and nationally are seeing comparable trends in advice demand.

G **Number of residents supported to live independently (Measure reference 18)**



Year End Success Target: 700 residents

COMMENTS

Measure Owner: Mike Pursehouse **Portfolio holder:** Cllr Natasha Harpley

Description of the performance this quarter: During Q2 of 2023/24, 17 Disabled Facility Grants (DFGs), 5 additional grant and 29 low level grants (LLGs) have been completed, along with 145 handyperson visits, totalling 196 homes supported. These figures compare to 42 DFGs, 19 additional support grants, 42 LLGs and 137 handyperson visits in Q3 of 2022/23.

Potential Implications: By the end of December, our spend for the 2023/24 financial year totalled £813,423. Our budget from the Better Care Fund is £1,013,705, plus additional funding of £88,465. This gives us a total budget for 23/34 of £1,102,161.

Action to be taken: Continue our current performance monitoring throughout the next financial year.

RISKS

Ultimately demand is outstripping available funds through the better care fund, and we are working as a County wider strategic group to understand how we can reduce demand on our system by improving the health of our residents.

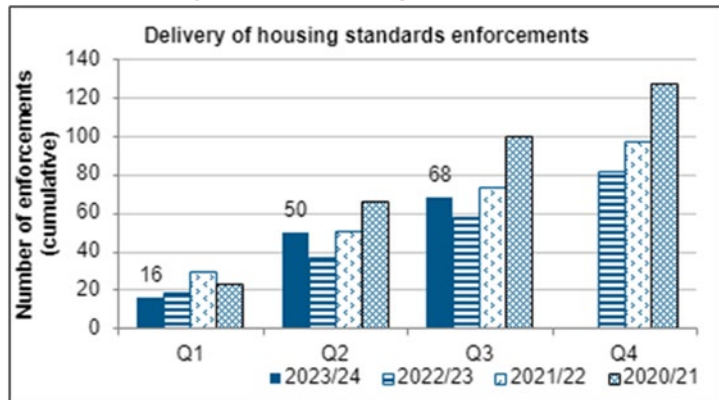
CONTEXT

One of our key responsibilities is to support residents to remain safely in their own homes, which helps to reduce pressure on other services, as well as enabling residents to remain independent and confident in their own homes. We can support residents in a variety of ways, with our key focus being on DFGs that enable us to physically adapt properties to meet the needs to the individual.

Additionally, the Council's Handyperson+ scheme offers small household repairs and minor adaptations. Our yearly target enables us to judge how many people we can support, by assessing trends in cost, complexity, delivery levels and resources.

G

Delivery of housing standards enforcement (Measure reference 19)



Year End Success Target: 75 enforcements

COMMENTS

Measure Owner: Mike Pursehouse

Portfolio holder: Cllr Natasha Harpley

Description of the performance this quarter: In Q3 of 2023/24, 18 disrepair complaints have been resolved, along with 2 occurrences of gypsies and travellers in the Broadland area. This compares to 21 disrepair cases and 2 reports of travellers in Q3 of 2022/23.

Potential Implications: The team can meet present demand through our current resource and currently have a full complement of staff with the skills to deliver in this area.

Action to be taken: Continue to monitor demand and appropriately adjust delivery if required.

RISKS

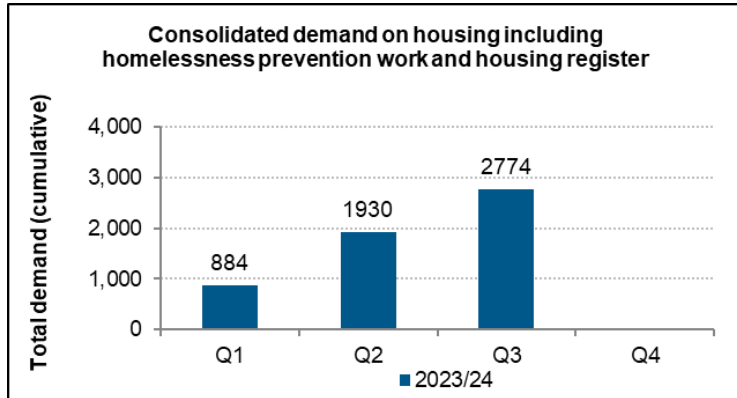
It is possible that demand may increase due to the cost-of-living crisis and greater awareness of damp issues, alongside with the proposed implication of new standards to rented homes. This will be monitored.

CONTEXT

A key aim of the Council is to ensure that we deal appropriately with private sector landlords who rent their properties out, and to ensure that these properties are maintained to an acceptable standard. This work includes identifying, registering, and monitoring Houses of Multiple Occupation (HMOs) to ensure they are safe, compliant and are not used for exploitation.

We ensure that unauthorised gypsy and traveller sites are dealt with appropriately, balancing the welfare of gypsies and travellers, with the impact on the local community.

R Consolidated demand on housing including Homelessness prevention work and Housing register (Measure reference 20)



Year End Success Target: 1,645

COMMENTS

Measure Owner: Mike Pursehouse

Portfolio Holder: Cllr Natasha Harpley

Description of the performance this quarter: Demand on the housing services remains high however this quarter did see a reduction in total demand to 844 from 1046 in the previous quarter. This is expected as Christmas, and the run up to Christmas often results in fewer family breakdowns. The total demand however still remains significantly above the full year target of 1645 as people continue to face a reducing private rental sector and household affordability issues.

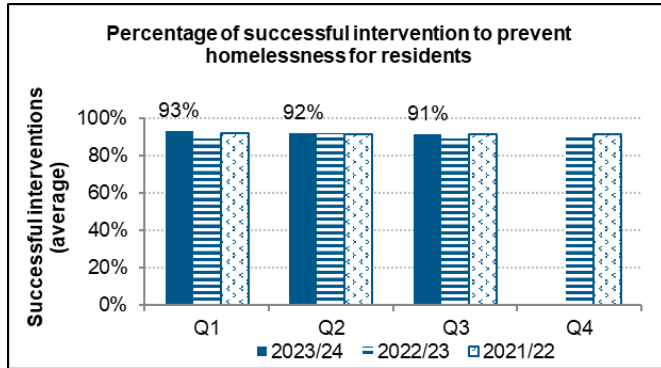
Potential Implications: The team is managing at present although the demand on the housing register for lower need remains a concern as those facing homelessness from private rental continue to face no other option than falling back upon the social rented sector thus reducing move on options for those now unsuitably housed within their housing (for example overcrowded).

Action to be taken: The team continues to perform very well under the circumstances. This is evidenced in performance measure 21 as our prevention ethos continues to provide very positive results. A workstream regarding managing the sustained increase demand from private rental sector (PRS), and the reducing capacity for PRS to be utilised as a prevention/sustainable home option will be forthcoming to cabinet within the next quarter.

RISKS - That demand continues to be sustained and currently low-level housing need becomes more serious prompting further high-level demand. Risks also remain regarding the cost of Temporary Accommodation. However, the purchase of more stock and co-investment through the local authority housing fund has mitigated the significant revenue spend

CONTEXT - We remain a highly regarded council with customer service at our core. Our prevention ethos, as a housing team individually but as part of the wider help hub means that although demand is high it is less than it may otherwise be. We are also not sitting still, we continue to develop out temporary accommodation offer, we have recently put in place a new homeless prevention officer and a people from abroad specialist housing solution officer. Our prison release officer continues to obtain success mitigating any further homelessness and possible risk to residents.

G Percentage successful intervention to prevent homelessness for residents - (Measure reference 21)



Year End Success Target: 80%

COMMENTS

Measure Owner: Mike Pursehouse

Portfolio Holder: Cllr Natasha Harpley

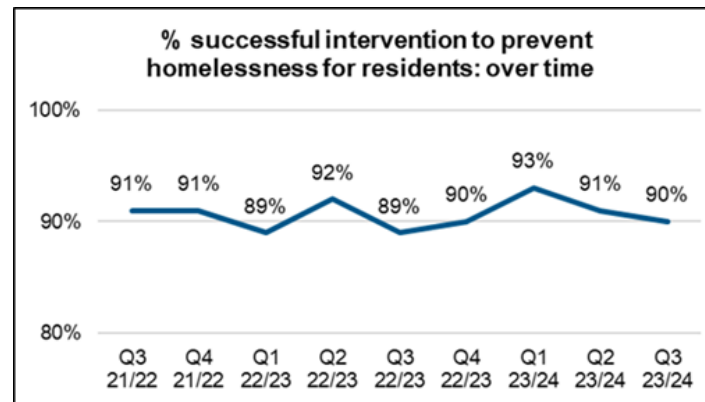
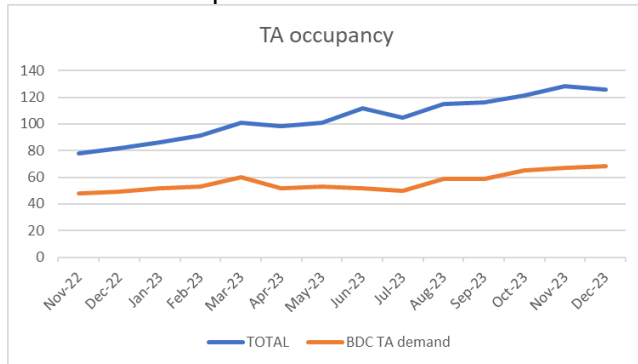
Description of the performance this quarter: Our prevention ethos continues to shine through with 91% (92% for the year) of total approaches prevented. This figure means that of the 2774 people who have approached the team we have provided holistic support, guidance and proactive homeless prevention advice to make sure 2552 residents have not had to face the ordeal of losing their home. With the reduction in private rental the upturn in domestic abuse and family breakdowns is incredibly hard to prevent, therefore, to prevent this for many residents is an incredible achievement. To note these figures do not include overall approaches to the help hub, a collective service whose primary focus is to prevent hardship to our residents, including housing concerns.

Potential Implications: This ethos must continue if we are to minimise the impact on temporary accommodation spend and potential growth of service. It is therefore encouraging to see such sustained service performance.

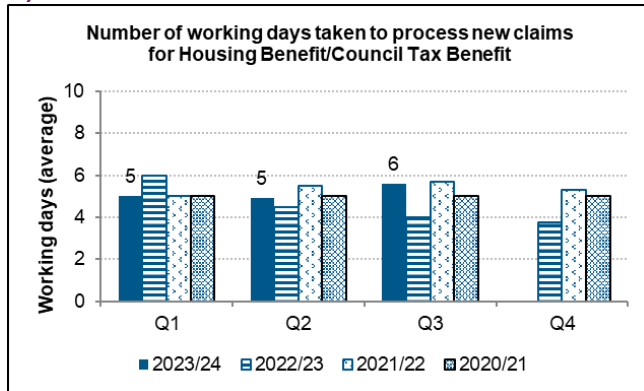
Action to be taken: To maintain performance at this level.

RISKS – There remains significant risk if this performance slips, however due to the team infrastructure and culture in place, officers remain confident that this risk remains contained

Context - Our performance remains consistent as shown in the graph.



G **Number of working days taken to process new claims for Housing Benefit/Council Tax benefit (Measure reference 22)**



Year End Success Target: 7 working days

COMMENTS

Measure Owner: Mike Pursehouse

Portfolio Holder: Cllr Natasha Harpley

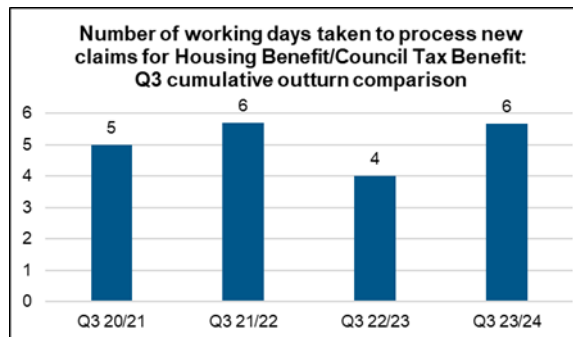
Description of the performance this quarter: Performance remained high for this quarter. The team during this period worked incredibly hard to bring the service completely up to date in preparation for the new system implementation. The upturn in days was due to this approach as all work items, no matter their complicated nature, were completed in a very small period. Traditionally the completion of such work items is spread out, well within acceptable customer levels as we endeavoured to make sure they were correct.

Potential Implications: In respect to this performance there are no concerns or implications, however the next two quarters will show a downturn as the new system is embedded. Whilst performance will be down in the short term, the new system will support our customers and save circa £1,000,000 over the next 7 years.

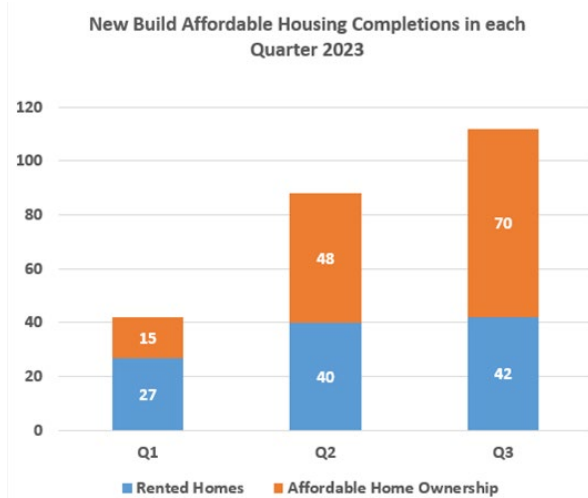
Action to be taken: None required

RISKS – The new system is presenting some challenges; however, this will be addressed in the next quarterly performance report. Officers are working incredibly hard to prioritise the most important work, both from a council financial prospective but more importantly a customer base.

CONTEXT - We continue to be a high performing Council in this area and remain top quartile.



G **Number of Affordable Homes delivered (Measure reference 23)**



Year End Success Target: Sufficient affordable housing to meet the needs of residents in accordance with the Strategic Market Assessment

The Local Housing Needs Assessment for Central Norfolk (2021) indicates a yearly target of 95 new affordable homes for Broadland.

RISKS

Due to the exceptional new build delivery levels in 22/23 the affordable housing completions delivery levels are expected to be lower for the current year. Nutrient neutrality issues have not greatly delayed the completion of affordable homes during 2023/24. However, we may start to see an impact on delivery in future years.

CONTEXT

Compared with 2022-2023 it is anticipated that there will be fewer completions through S106 obligations. However, the Housing Enabling team continues to work with house builders and Housing Associations to ensure ongoing delivery of new build affordable homes – to good space standards and including wheelchair accessible dwellings.

COMMENTS

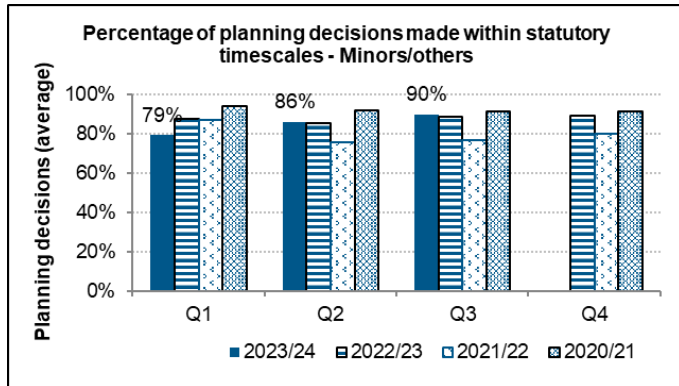
Measure Owner: George Denton **Portfolio Holder:** Cllr Martin Booth

Description of the performance this quarter: Up to the end of December 2023 we saw a further 112 new affordable homes delivered of which 42 are Affordable Housing for Rent and 70 are for Affordable Home Ownership (AHO) all as Shared Ownership. All new build affordable units have been handed over by the house builders to Housing Associations (Registered Providers). These recent completions provide a combined total affordable housing delivery for Q1 to Q3 of 242 new build units. This therefore considerably exceeds the Broadland target of 95 units per annum - as required by the Greater Norwich Local Housing Needs Assessment. We have seen high delivery continue on Land of Smee Lane at Postwick (Allison Homes for L&G). The early delivery Phase is providing a high level of additional affordable units (non S106). These are mainly for Affordable Home Ownership (Shared Ownership). In Q3 there was also new homes delivered in Blofield Corner, Drayton, Spixworth, Rackheath and Hellesdon. There were also final units completed at Rackheath (Trinity Meadow) and Acle (St Edmund’s Park).

Potential implications: The number of affordable homes completed during 2023/24 (242) is already in excess of the annual target (95). However, new build affordable housing delivery may start to slow down over the next year and any economic downturn or uncertainty could also reduce the number of new build affordable homes delivered.

Action to be taken: None at present but continue to monitor the situation.

G Percentage of planning decisions made within statutory timescales – minors/others (Measure reference 25)



Year End Success Target: 80% minors/others in agreed time

COMMENTS

Measure Owner: Helen Mellors **Portfolio Holder:** Cllr Stuart Beadle

Description of the performance this quarter: 97% of applications were determined in time in Quarter 3 (158 out of 163 applications) bringing the average for the year to date to 90%. 92 applications were determined in the statutory time period of 8 weeks and a further 66 were determined in an agreed extension of time.

The national minors / others measure excludes applications for advertisement consent, Listed Building consent, Certificates of Lawfulness, etc, however, when measured against all applications, which includes applications for advertisement consent, Listed Building consent, Certificates of Lawfulness, etc the combined figure is 98.8% (96% for all minor applications and 97.6 % for all other applications). We determined a total of 179 applications in this quarter and 177 agreed in time.

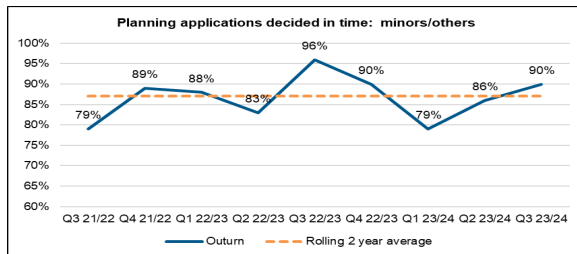
We are now measured as part of a national measure for a rolling 2-year performance. If we fall below the national measure of 70%, we will have special measures introduced. Our current rolling 2-year performance for minors/others is 89.2 %, which against the national target of 70% is good, and as such the Authority is not at risk of special measures.

Potential Implications: None.

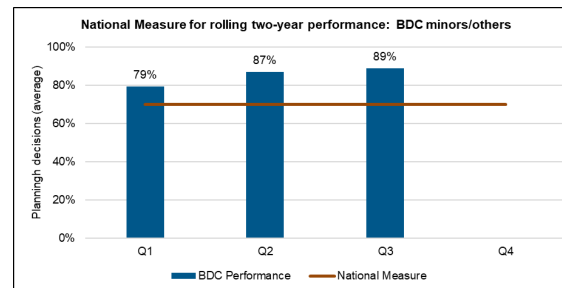
Action to be taken: Ensure all officers are meeting the national target.

RISKS – We are above our target of 80%. We are exceeding the national target rolling 2-year target of 70% and so there is no risk of special measures being introduced. We continue to work with the team to ensure extensions of tie are agreed and are seeking additional resources to ensure we meet targets.

CONTEXT –

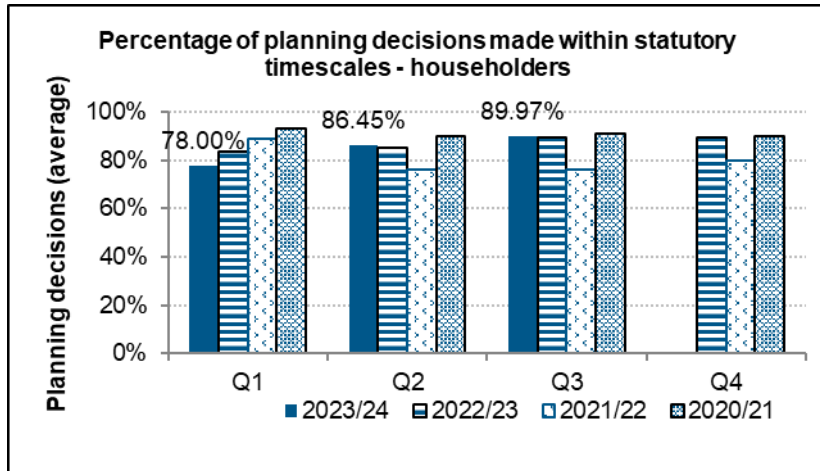


The graph above shows a comparison for previous years



The graph above shows the performance against the rolling 2-year average.

G Percentage of planning decisions made within statutory timescales - householders (Measure reference 25)



COMMENTS

Measure Owner: Helen Mellors **Portfolio Holder:** Cllr Stuart Beadle

Description of the performance this quarter: 97% of applications were determined in time within quarter 3 (103 out of 106 applications) bringing the average for the year to date to 89.97%. 74 applications were determined in the statutory time period of 8 weeks and a further 29 were determined in an agreed extension of time. 33% were determined in 6 weeks or less

Note the number of householder applications determined in time are part of the other category measured in the above national category.

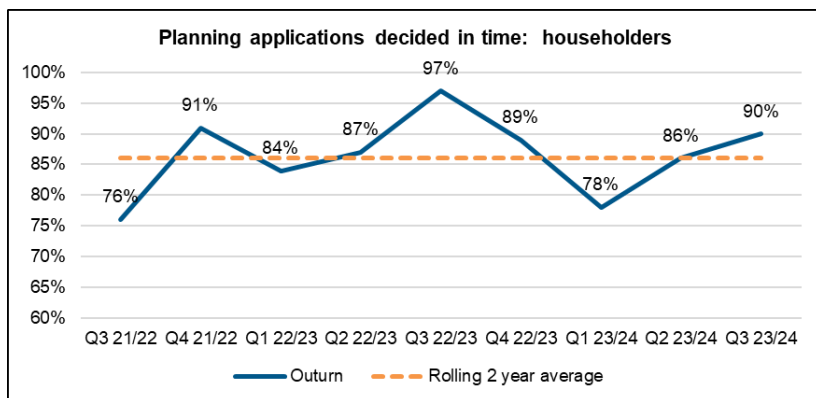
Potential Implications: None

Action to be taken: None

Year End Success Target: 80% of decisions

RISKS

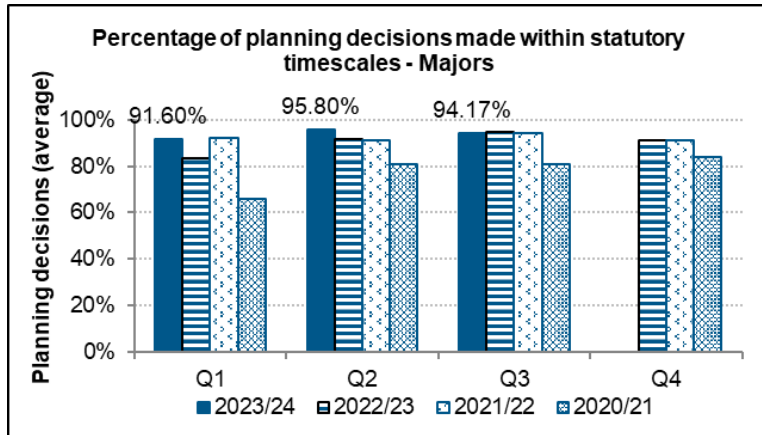
We are exceeding our target of 80%. We continue to work with the team to ensure extensions of time are agreed and are seeking additional resources to ensure we meet targets



CONTEXT

The graph to the left shows a comparison for previous years.

G Percentage of planning decisions made within statutory timescales - majors (Measure reference 25)



COMMENTS

Measure Owner: Helen Mellors

Portfolio Holder: Cllr Stuart Beadle

Description of the performance this quarter: 90.9% of applications were determined in time within quarter 3 (10 out of 11 applications) bringing the average for the year to date to 94.17%. 3 applications were determined in the statutory time period of 13 weeks and a further 7 were determined in an agreed extension of time.

The national average for "Major" applications determined in 13 weeks or agreed time limit for Q3 in 2022 was 88%. We are now measured as part of a national measure for a rolling 2-year performance. If we fall below the national measure of 60% we will have special measures introduced. Our current rolling 2-year performance for majors is 90.3%, which is against the national target of 60% means the Authority is not at risk of special measures.

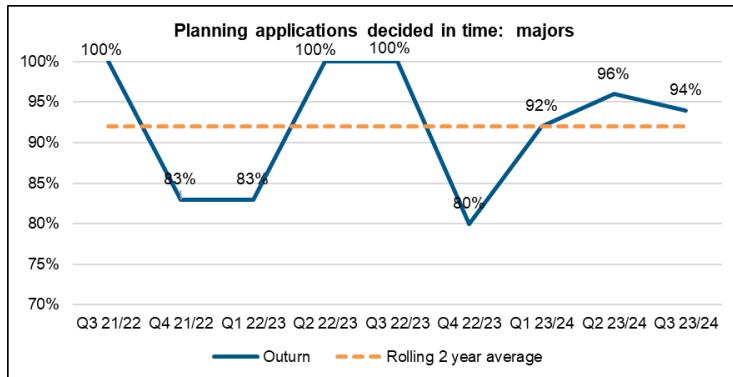
Potential Implications: None

Action to be taken: None

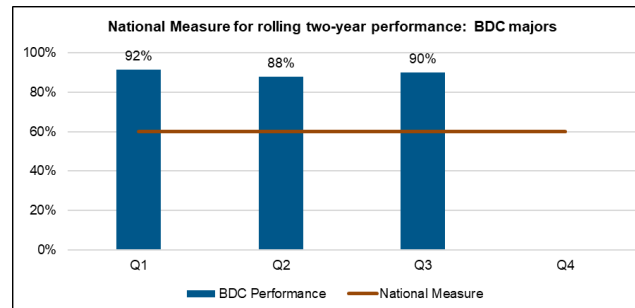
Year End Success Target: 80% of decisions

RISKS - We are above our target of 80% and above the national measure of 60% both for the quarter and the rolling two-year measure. We continue to work with the team to ensure extensions of tie are agreed and are seeking additional resources to ensure we meet targets.

CONTEXT

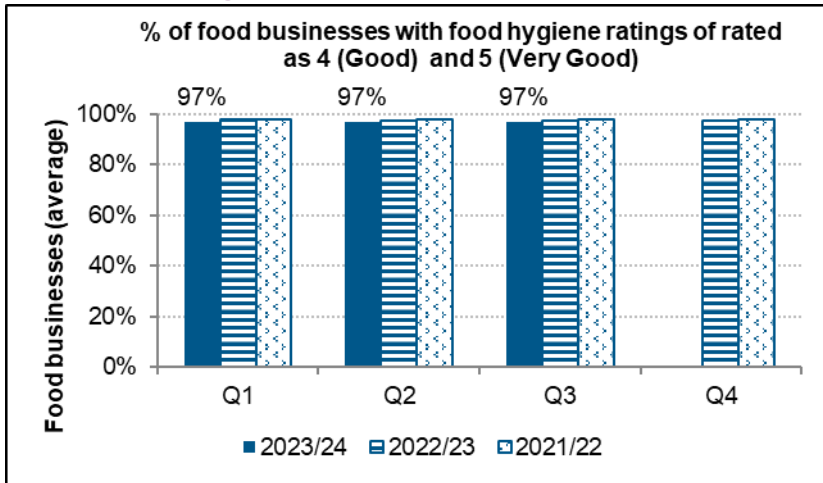


The graph above shows a comparison for previous years.



The graph above shows the performance against the rolling 2-year average.

A Percentage of food businesses with food hygiene ratings of rated 4 (Good) and 5 (Very Good) (Measure reference 26)



COMMENTS

Measure Owner: Nick Howard

Portfolio Holder: Cllr Jan Davis

Description of the performance this quarter: This quarterly measure remains static, where 96.8% represents a total of 841 (5-rated) and 101 (4-rated) businesses respectively out of 973 food businesses within the Food Hygiene Rating Scheme in Q3. A total of 109 food safety interventions were carried out and new ratings issued under the Brand Standard. Strong performance was noted in the timeliness and support to newly registered food businesses, with the cycle of those 'awaiting inspection' numbering only 13 businesses (high performing).

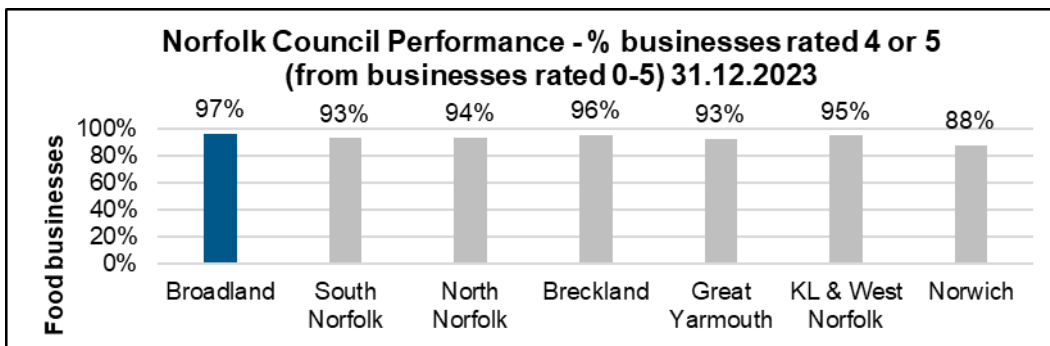
Potential Implication: When trading in challenging economic conditions has an impact on profitability, we may see Food Business Operators concentrating on survival and basic compliance (3-rating), rather than adopting higher standards linked with 4 and 5 ratings.

Action to be taken: Continue to adapt to new Food Standards Agency (FSA) advice for local authorities in the planning and implementation of our food intervention programme, plus continuing to provide early start-up 'best advice'.

Year End Success Target: 98%

RISKS

Higher food hygiene ratings indicate stronger protection for consumers and is a cornerstone of the Food Standards Agency (FSA) strategy of 'food you can trust'. Our regulatory activity aims to ensure that food produced locally or sold in Broadland is safe to eat. Limited staffing resources continue to be stretched by heavy reactive demand, in addition to new direction being provided to local authorities by the FSA for 2023/24. We have also yet to see the full impact of the cost-of-living crisis and implications for consumer spending patterns that may affect the longer-term profitability of some food businesses.



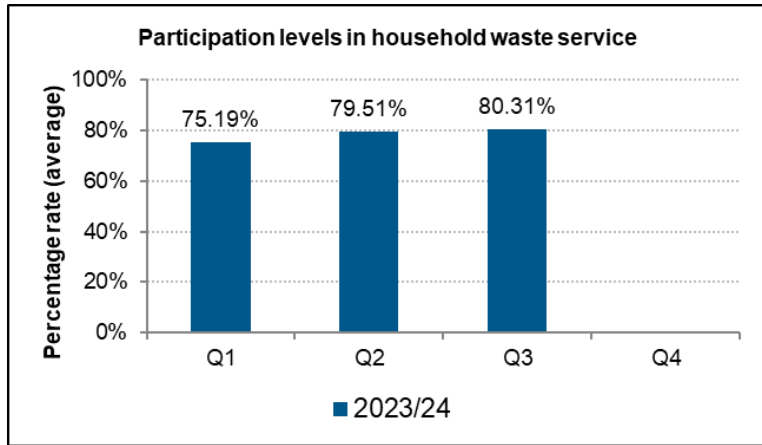
CONTEXT

The table benchmarks the percentage of food businesses with a Food Hygiene Rating of 4 or 5 in other Norfolk authorities.

Source: Food Standards Agency.

G

Participation levels in household food waste service (Measure reference 27)



COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Jan Davis

Note this is a revised indicator which replaces ‘Household food waste recycled’ – Benchmark set at 70%. Description of the performance this quarter based on Participation Survey

- Survey period - October 2023 – December 2023
- Number of households sampled 9,100 across one area

Description of the performance this quarter:

The Q3 2023/24 survey showed:

- **Set-Out Rate:** the percentage of households that put out their food waste container on any one collection. For the period October 2023 - December 2023 the **set-out rate was 80.31%**.
- **Participation Rate:** the percentage of households that put out their food waste container at least once in a defined three-week period. For the period covered 7th - 25th October 2023 the **participation rate was 81.37%**.

Further analysis of the data showed that the overall food waste tonnage in Q3 2023/24 was 982.03t. This is a slight decrease of 62.55t in comparison to Q3 2022/23 with 1,044.58t.

Potential Implications: Impact on overall year-end recycling rate.

Action to be taken: The Council will continue to promote the use of the service wherever possible and continue to raise awareness that putting out even small quantities of food waste is important.

Year End Success Target: Increase in the overall set out rate by 2% against Benchmark.

RISKS

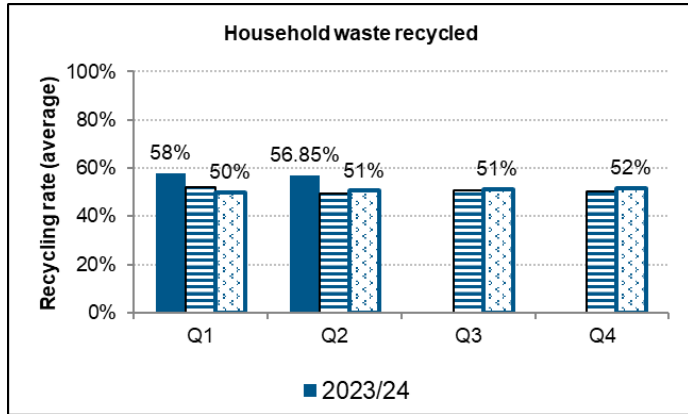
- Behavioural barriers and hygiene concerns (flies, smells)
- Failure to provide households with free liners and households unwillingness to pay for additional liners

CONTEXT

- A comparator audit undertaken by WRAP (Waste & Recycling Action Programme) showed that the average participation rate for those local authorities providing a food waste collection service was between 35-55% (2021).

G

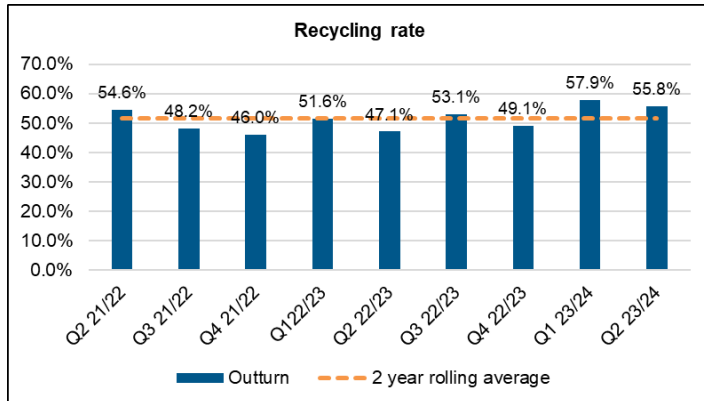
Percentage of household waste recycled (Measure reference 28)



Year End Success Target: 2% increase against a baseline of 50.60% (Oflog Family Group Mean 44.95% 2021/22)

RISKS: Not being able to continue to increase the amount of household waste that is being recycled through increasing householder apathy towards recycling, a misunderstanding over what can go in which bin, leading to contamination or potentially recyclable materials being put in the residual waste.

CONTEXT



COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Jan Davis

Description of the performance this quarter:

Note Q3 2023/24 data is not yet available. The information below relates to Q2 2023/24.

The overall recycling rate in Q2 2023/24 was 55.8% which is a decrease of 2.1% from the 57.9% recorded in Q1 2023/24. Further analysis of the data shows that the dry recycling rate decreased only by 0.07% while the composting rate (food and garden waste) decreased by 2.05% compared to Q1 2023/24.

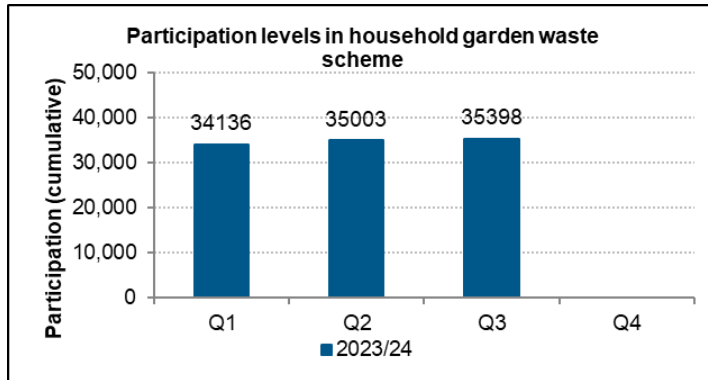
Potential Implications: Impact on overall year-end recycling rate.

Action to be taken: The Council will continue to encourage residents to recycle as much as possible and promote the ReCollect App.

During Q2 the Council:

- Held a recycling information stand at the Aylsham Agricultural Show in collaboration with Veolia (28th August). Gave away goodie bags and informational leaflets about recycling right, answered residents' questions about the kerbside recycling collection service the Council provides in the district.
- Arranged several recycling talks in the district (Sprowston, Wroxham, Aylsham).
- Provided bin stickers/tags for communal bins – reminding residents what can and can't be recycled at home.

G Participation levels in household garden waste service (Measure reference 29)



Year End Success Target: Increase of 500 in the total number of subscribers over the year – baseline at start of year being 34,600

COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Jan Davis

Note this is a revised indicator which replaces ‘Tonnage by household of garden waste being recycled’ – Benchmark set at 34,600 end of March 2023

Description of the performance this quarter:

The total number of subscribers to the garden waste collection service was 35,398 as of the end of Quarter 3 2023/24.

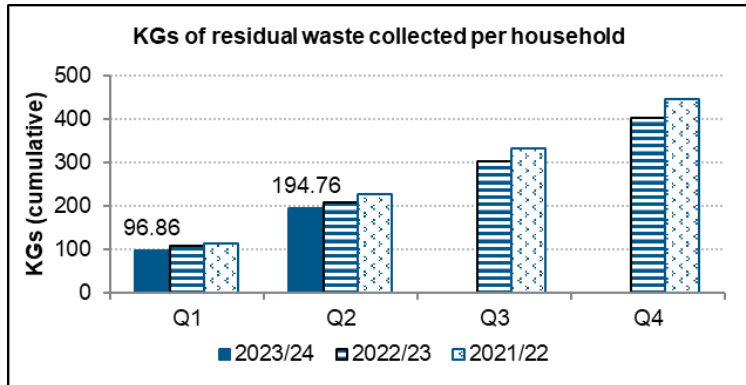
Potential Implications: Impact on overall year-end recycling rate and income from garden waste subscriptions.

Action to be taken: The Council will continue to work with Veolia to promote garden waste service to the residents to dispose the garden waste in an environmentally friendly way.

RISKS The collection of garden waste contributes to the council’s recycling performance figures and any reduction in garden waste volumes because of households cancelling subscriptions to the waste service will affect the overall recycling rate figure.

CONTEXT All authorities in Norfolk provide a paid for garden waste collection service, the Council also work closely with Norfolk County Council to promote the sale of discounted home composting bins as an alternative option.

G KGs of residual waste collected per household (Measure reference 30)



Year End Success Target: Decrease of 10KGs of residual waste collected per household

COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Jan Davis

Description of the performance this quarter: Note Q3 2023/24 data is not yet available. The information below relates to Q2 2023/24 - (Baseline set at 446 kg/hh/yr BDC (Oflog Family Group Benchmark figure 2021/22))

The total kgs of residual waste collected per household in Q2 2023/24 was 97.9 kg/hh compared to 96.86 kg/hh in Q1 2022/23. This is an increase of 1.04 kg/hh or 1%.

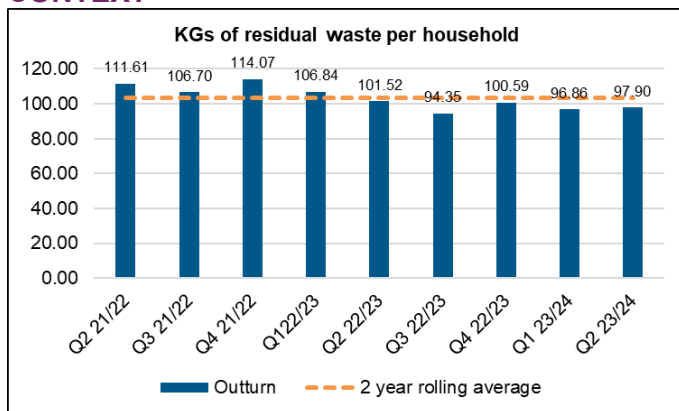
Potential Implications: Impact on overall year-end recycling rate.

Actions to be taken: The Council will continue a range of recycling campaigns to encourage households to recycle and to tackle contamination thus increasing the quality and quantity of recyclables collected.

RISKS

- Householder apathy to recycling overall and lack of knowledge and environmental consciousness over what can or cannot be recycled
- Materials that could and should be recycled being put into the residual waste

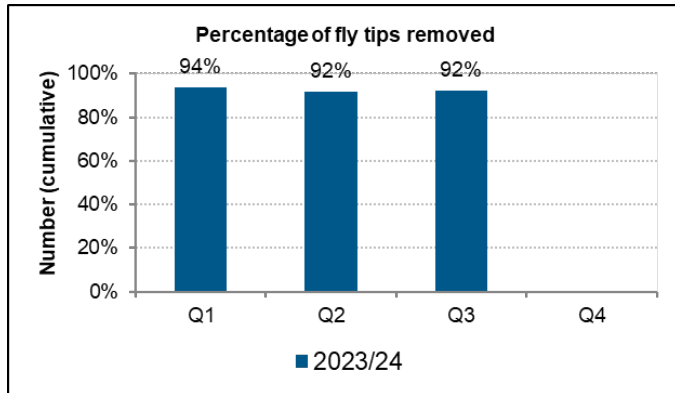
CONTEXT



During Q2 the Council:

- Held a recycling information stand at the Aylsham Agricultural Show in collaboration with Veolia (28th August). Gave away goodie bags and informational leaflets about recycling right, answered residents' questions about the kerbside recycling collection service the Council provides in the district.
- Arranged several recycling talks in the district (Sprowston, Wroxham, Aylsham).
- Provided bin stickers/tags for communal bins – reminding residents what can and can't be recycled at home.

A **Percentage of fly tips removed within 1 working day (Measure reference 34)**



Year End Success Target: 100% of non-hazardous fly tipped materials removed from relevant land within 1 day of being reported

COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Jan Davis

Note this is a revised indicator for 2023/24. Description of the performance this quarter:

- A total of 95 fly tips were reported in Q3 of these only 75 were found and cleared
- 88 (93%) were attended to within 1 working day, the remainder were cleared on average within 3 working days.
- 13 of the fly tips were attended to on the same day Veolia received the report.
- 75 of the fly tips were attended to within 1 working day
- 38 of the fly tips cleared were reported through the website

Potential Implications: The waste contract requires Veolia to clear non-hazardous fly tipped material within one working day, failure to meet the target triggers a default payment, this quarter a default payment has been made on 7 fly tips.

Action to be taken: Continue to work with Veolia and the Council's Environmental Enforcement Team to reduce the amount of fly tipping. Veolia's streets team to communicate directly with the Enforcement Team to this affect.

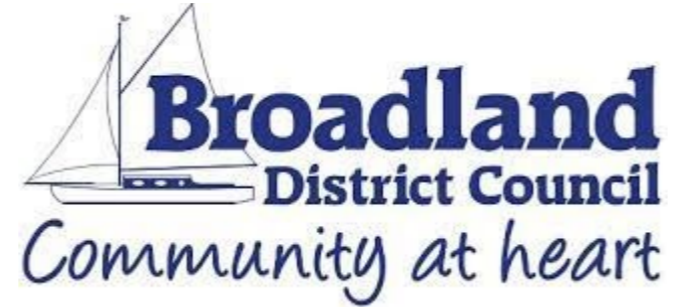
RISKS - If fly tips are not cleared quickly, then the risk is that they are added to and lead to degradation of the local environment.

CONTEXT - The measure only reports on fly tips that have been reported to Veolia by the Council and subsequently found in the location reported. The most common reports come via the website, phone calls or email, although Veolia do clear a significant number of fly tips proactively (without a report from the public). This measure does not include the fly tips proactively cleared by Veolia, of which in Q3 there were 86.

Appendix 3

Broadland District Council – Strategic Risk Register

Last reviewed – January 2024



Broadland District Council – Strategic Risk Management

The risk appetite of the Council is outlined by a risk appetite statement as set out below:

South Norfolk and Broadland are both dynamic, innovative and commercially minded Council's that empower staff to make well-rounded decisions and take proportionate risks within our boundaries based on intelligence, reason and insight, seizing opportunities to enhance the wellbeing of our communities, economy and staff, reimagining the role of local government.

The statement outlines the Council's approach to risk appetite and is accompanied by a risk scoring matrix (see below) which indicates whether the combined risk likelihood and impact score is above the appetite of the Council. The appropriate approach for managing the risk is then highlighted depending on the combined score. There is a copy of the likelihood and impact matrix from our Risk Management Policy at the end of this report for reference.

Any risk with a combined score of 10-25 is outside the risk appetite and action must be taken to reduce the score down to an acceptable level to protect the achievement of the Council's strategic aims and objectives. The following pages of this report sets out the current Strategic Risks to the Council, their current risk scores and the actions being taken to reduce the scores.

Risk Scoring Matrix		1	2	3	4	5
		Insignificant	Minor	Moderate	Significant	Severe
5	Expected	Medium 5	Medium 10	High 15	Very High 20	Very High 25
4	Highly Likely	Low 4	Medium 8	High 12	High 16	Very High 20
3	Likely	Low 3	Medium 6	Medium 9	High 12	High 15
2	Not Likely	Very Low 2	Low 4	Medium 6	Medium 8	Medium High 10
1	Rare	Very Low 1	Very Low 2	Low 3	Low 4	Medium 5
Very High 20-25		Risks scored here represent a severe threat to the delivery of the Council's objectives and service delivery and are outside of the risk appetite of the Council. Risks scored at this level should be treated as a priority and should either be reduced to a score within tolerance or removed. Reporting on progress will be required at Cabinet/Audit Committee and at CMLT until risk level is reduced to tolerance.				
High/Medium High 10-16		Risks scored here represent a significant threat to the delivery of the Council's objectives and service delivery and are outside the risk appetite. Action is required to reduce the rating to a score within tolerance. Reporting on progress is required at Cabinet/Audit Committee and CMLT until risk level is reduced to tolerance.				
Medium 5-10		Risks scored here represent a moderate threat to the delivery of the Council's objectives and service delivery and are within the risk appetite of the Council with some proportionate mitigation and regular monitoring required. These risks can be managed at operational/service level but regular management review of assurance on control effectiveness should occur. Routine reviews should also be carried out to ensure there is no change.				
Low 3-4		Risks here represent a minor threat to the delivery of the Council's objectives and service delivery and are within the risk appetite. Review required to ensure risk score does not change/increase, however these risks can be managed at operational/service level.				
Very Low 1-2		Risks scored here represent an insignificant threat to the delivery of the Council's objectives/service delivery and are within the risk appetite. No further action is required.				

Key Changes to Strategic Risks

The most recent review of the of the strategic risk has generated the following changes:

Risk Ref	Risk Score Change	Risk description change	Risk consequence change	Risk mitigations change	Risk owner change	New Strategic Risk	Commentary
BDCM1							
BDCM2							
BDCM4	x		x	x			Risk and mitigated scores reduced. Mitigation action completed (mitigation 8) New mitigation action added (mitigation 10).
BDCM5				x			New mitigation added (mitigation 9)
BDCSI3							
BDCP3	x		x				Risk and mitigated risk score reduced

Strategic Risk Register

						Inherent Risk (if no further action taken)									Mitigated Risk		
Objective	Ref	Risk description	Existing Controls	Likelihood	Impact	Severity score	Risk Response	Planned mitigating actions	Risk Owner	Portfolio Holder	Delivery timescales	Likelihood	Impact	Severity score	Within Risk Appetite?	Comments and progress on actions	
Moving with the times, working smartly and collaboratively	BDCM1	<p>Risk - Ambitions in the Delivery Plan do not match the revenue and capital budgets.</p> <p>Consequence - Failure to deliver the Delivery Plan set out at the start of the financial year.</p>	<p>Regular review and monitoring of the Delivery Plan.</p> <p>Medium Term Financial Plan budget process and scenario planning.</p> <p>Corporate Leadership Team (CLT) relationship building and liaison with key stakeholders such as central Government departments and professional bodies.</p> <p>Regular Horizon Scanning.</p> <p>Implementing Broadland/South Norfolk Collaboration.</p> <p>Quarterly review of performance and risks to the organisation.</p> <p>Active Membership of different groups such as the District Councils Network (DCN), Local Government Association (LGA), Rural Services Network (RSN) etc.</p>	3	5	15	Reduce	<ol style="list-style-type: none"> Lobby government for adequate funding, acknowledging impact on costs & demand of cost of living rises. Respond to Government Consultations to ensure any potential impact on the Council finances is conveyed to Government. Feed into any relevant networks e.g. Local Government Association and District Council Network to influence policy creation. Ensure local MP's are aware of the Council financial position and potential impact of any forthcoming Government policies as part of the regular 	Assistant Director Finance	Cllr Steve Riley	<ol style="list-style-type: none"> Prior to Autumn budget As appropriate when consultations open As Appropriate At regular MP Briefings Monthly Quarterly 	2	5	10	No	<p>No change to the risk score - Provisional Settlement for 24/25 has provided a 3% increase in core spending power, but again this is only a one year settlement.</p> <ol style="list-style-type: none"> Requirement to continue to lobby for a multi-year settlement in future & recognition that cost of living rise will squeeze council budgets as both costs & demand for services increase. As appropriate when consultations open. As appropriate. At regular MP Briefings. Monthly horizon scanning and policy reports are developed for CLT. Completed on a quarterly basis. 	

						Inherent Risk (if no further action taken)							Mitigated Risk			
Objective	Ref	Risk description	Existing Controls	Likelihood	Impact	Severity score	Risk Response	Planned mitigating actions	Risk Owner	Portfolio Holder	Delivery timescales	Likelihood	Impact	Severity score	Within Risk Appetite?	Comments and progress on actions
								MP briefings. 5. Continued regular horizon scanning and policy updates to Corporate Leadership Team (CLT) and management team to ensure we stay abreast of changes and are able to have influence. 6. Regular monitoring of our current position and reporting to Members.								
Moving with the times, working smartly and collaboratively	BDCM2	<p>Risk - The Council fails to take advantage and act quickly and proactively on the opportunities of Local Government Reform, devolution and wider government policy.</p> <p>Consequence - Failure to achieve potential for greater devolved funding and/or decision making to the</p>	<p>Regular Horizon Scanning.</p> <p>Active Membership of different groups such as the District Councils Network, Local Government Association, Rural Service Network etc</p> <p>Implementing Broadland/South Norfolk Collaboration.</p> <p>Quarterly review of performance and risks to the organisation.</p> <p>CLT relationship building and liaison with key stakeholders such as</p>	3	4	12	Reduce	<p>1. Review the outcomes of the Devolution White Paper when it is released (completed)</p> <p>2. Continued regular horizon scanning and policy updates to CLT, management team and Members to ensure we stay abreast of changes and are able to have influence.</p> <p>3. Lobby MPs on specific</p>	Director of Resources	Cllr Susan Holland	<p>1. Expected in Autumn 2021 (completed)</p> <p>2. Monthly</p> <p>3. As appropriate</p> <p>4. As appropriate</p> <p>5. April 2023 (completed)</p>	3	4	12	No	<p>No change to the risk score</p> <p>2. Regular policy updates are presented to CLT and the wider organisation to ensure we stay abreast of key changes. A monthly horizon scanning report is produced for CLT and the Strategy Team attends Directorate meetings on a regular basis to provide an overview of recent policy updates.</p> <p>3. This is ongoing and done as appropriate, with MPs briefed on the levelling up option that would be favoured as Districts to deliver the best outcome for our residents.</p> <p>4. This is ongoing and done as appropriate.</p>

Inherent Risk (if no further action taken)																Mitigated Risk
Objective	Ref	Risk description	Existing Controls	Likelihood	Impact	Severity score	Risk Response	Planned mitigating actions	Risk Owner	Portfolio Holder	Delivery timescales	Likelihood	Impact	Severity score	Within Risk Appetite?	Comments and progress on actions
		region and the benefits this would bring for residents and businesses in our area.	central Government departments and professional bodies.					policy issues and the implications for our residents. 4. Work with our partners where appropriate to present a collaborative response to political changes. 5. Respond to the Deal for Norfolk consultation (completed)								
Moving with the times, working smartly and collaboratively	BDCM4	<p>Risk - Ambitions in the Delivery Plan do not match the capacity and capability of the organisation.</p> <p>Consequence - Failure to deliver the Delivery Plan set out at the start of the financial year.</p>	<p>Four-year Strategic Plan developed and in place which sets out the ambitions for the Council over the coming years.</p> <p>Delivery Plan for the Council developed and in place which sets out the detailed projects and Business as usual for the Council in the coming year to 2024.</p> <p>Management/Leadership Training and Development in progress.</p> <p>Regular Budget Monitoring.</p> <p>Project Management Office in place with the core purpose of aligning Transformation projects</p>	4	4	16	Reduce	<p>1. Identification and management of known resource issues across the organisation (e.g. procurement)</p> <p>2. Scope and develop a talent management programme.</p> <p>3. Build our own talent - Develop projects to consider our use and opportunities of apprenticeships, internships, career placement, graduates etc.</p> <p>4. Implement successful recruitment</p>	<p>1 - CLT</p> <p>2 - 4 Chief of Staff</p> <p>5 - Director of Resources</p> <p>6 - 7 - Chief of Staff</p> <p>8 - 9 – 10 Assistant Director ICT/Digital and Transformation</p>	Cllr Dan Roper	<p>1. Throughout the Delivery Plan period (2020-2024) 2 and 3.</p> <p>Throughout the Delivery Plan period (2020-2024)</p> <p>4. April 2022 – March 2023 (completed)</p> <p>5. Ongoing and now a part of business as usual</p> <p>6. September 2023</p> <p>7. Throughout the Delivery Plan period (2020-2024)</p> <p>8. Throughout the Delivery Plan period (2020-2024)</p> <p>9. Starting to widen approach 2023/24</p> <p>10. Integrated approach defined and implemented by Q1 24/25</p>	4	4	12	No	<p>Risk reduced</p> <p>1. The procurement team is now more stable, and progress has been made in ensuring the contracts register is up to date and advice is provided promptly. However, there is still further work to do to ensure consistency of advice. Other areas currently being reviewed for resources are those associated with capital programmes, mainly SNC projects. Improvements are also being made to business cases to ensure we have the right capacity and capability to take forward key initiatives i.e. capitalisation of Project Manager for HR & Payroll system.</p> <p>2. Ongoing</p> <p>3. Ongoing, now BAU</p> <p>4. Action completed - now BAU</p> <p>5. The portfolio approach has been established for transformation governance providing greater viability over</p>

						Inherent Risk (if no further action taken)							Mitigated Risk				
Objective	Ref	Risk description	Existing Controls	Likelihood	Impact	Severity score	Risk Response	Planned mitigating actions	Risk Owner	Portfolio Holder	Delivery timescales	Likelihood	Impact	Severity score	Within Risk Appetite?	Comments and progress on actions	
			in the pipeline and resource for delivery					<p>campaigns particularly in service areas where there are specific needs for skills which are hard to recruit to or shortage of resource available (e.g. nationally). Agile Working Policy enables a broader approach to recruitment (completed)</p> <p>5. Additional financial monitoring of key projects.</p> <p>6. Delivery of agile working approach and cultural shift to better attract and retain talent.</p> <p>7. Local authority benchmarking across the region and wider to ensure pay and benefits on a role specific basis remain comparable and competitive.</p> <p>8. Track and monitor external Project</p>									<p>project and programme delivery and is being rolled out to other portfolios.</p> <p>6. Ongoing, now BAU</p> <p>7. Still work in progress, focus is currently on the implementation of the new HR & Payroll system which will result in our own data being better and timelier, we can then look to pick up the benchmarking again.</p> <p>8. Resource tracking continues and monitoring of external project management costs continue to be monitored. Action complete – now in BAU</p> <p>9. Transformation portfolio is in operation, the final portfolio and its underpinning boards are currently being finalised.</p> <p>10. In progress</p>

						Inherent Risk (if no further action taken)							Mitigated Risk			
Objective	Ref	Risk description	Existing Controls	Likelihood	Impact	Severity score	Risk Response	Planned mitigating actions	Risk Owner	Portfolio Holder	Delivery timescales	Likelihood	Impact	Severity score	Within Risk Appetite?	Comments and progress on actions
								Management resource volumes deployed to deliver projects and where appropriate employ resource to align with project pipeline demonstrating better value for money. 9. Starting to widen approach defined and implemented by Q1 24/25. 10. Further integrate the budget setting and planning								
Moving with the times, working smartly and collaboratively	BDCM5	Risk - National Cyber Security Centre has advised of a heightened cyber threat for UK organisations due to the volatile situation in Ukraine and the potential for state-sponsored attacks on NATO members, which includes the UK. Consequence - A successful cyber-attack could render the	Geo-blocking of traffic originating from black-listed countries. Timely application of security updates to all software and firmware Ensuring Anti-Virus software updated and functioning Monitoring of adherence to security policy ensuring there are no exceptions Ringfenced £125,000 from the Future Councils funding to dedicate to	5	5	25	Reduce	1. Ensure the effectiveness of the Controls - commission a third-party review of the Council's security posture 2. Review the organisation structure to ensure clear accountability for the effective implementation of security controls and the day-to-day monitoring and management of	Assistant Director ICT/Digital and Transformation	Cllr Dan Roper	1. Ongoing, annual requirement 2. Completed 3. Ongoing 4. Ongoing 5. Ongoing requirement 6. Roll out expected Sep/Oct 23 7. Recommendation output expected December 23 8. Implementation 23/24 from Q4 9. Q1 24/25	4	5	20	No	No change to risk score 1. Cyber Assessment Framework is underway now due for December completion 2. CISO role recruited this action is complete the review of monitoring tool is underway and will be part of action 8. 3. No update this will be a direct output of the CAF 4. IT have planned several training sessions with Norfolk & Suffolk Police Cyber Protect Team to be held in Q3 23/24 to practice scenarios and planning scenarios should the Council be subject to a cyber-attack. However, this does not directly influence the mitigated score as it is in relation to dealing with an

						Inherent Risk (if no further action taken)							Mitigated Risk			
Objective	Ref	Risk description	Existing Controls	Likelihood	Impact	Severity score	Risk Response	Planned mitigating actions	Risk Owner	Portfolio Holder	Delivery timescales	Likelihood	Impact	Severity score	Within Risk Appetite?	Comments and progress on actions
		ICT infrastructure and line of business systems unusable for a protracted period of time, significantly impacting the Council's ability to function result in a significant financial impact to the business.	improving our approach to cyber security and to implementing the actions resulting from the Cyber Assessment Framework.					<p>security events (complete)</p> <p>3. Raise awareness of the risk of cyber-attack with the business and the importance of adhering to the security policy</p> <p>4. Ensure ICT staff adequately trained and skilled to apply security control and manage security events</p> <p>5. Ensure Members are aware of Cyber-security risks through the completion of Skills Gate</p> <p>6. Review and implement a bespoke Cyber Security awareness training package making it an annual requirement delivered to all Council staff and members to improve the organisations Cyber security culture.</p> <p>7. Undertake the NCSC</p>								<p>incident should it occur.</p> <p>5. as above - no update</p> <p>6. The implementation of this training programme is dependent on the outputs of the Cyber Assessment Framework (CAF) results. These results will be used to inform the training programme based on the identified areas of development.</p> <p>7. The CAF process is being led by a third party in which there has been a delay to the timescale of the outputs of this report. The roll out of this will be delayed coinciding with receipt of the CAF results expected December</p> <p>8. As above - action 7</p> <p>9. In progress</p>

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Objective	Ref	Risk description	Existing Controls	Likelihood	Impact	Severity score	Risk Response	Planned mitigating actions	Risk Owner	Portfolio Holder	Delivery timescales	Likelihood	Impact	Severity score	Within Risk Appetite?	Comments and progress on actions
								Cyber Assessment Framework to identify any gaps to the NCSC LG profile. 8. Review and consider any further monitoring tools required to prevent and reduce the risk of Cyber Security events. 9. Seek cyber insurance								
Supporting individuals and empowering communities	BDCS13	<p>Risk - There is insufficient affordable private housing and insufficient social housing supply, and access to temporary accommodation to meet the homelessness needs of our residents.</p> <p>Consequence - The Council is unable to provide sustainable housing options which results in greater numbers in temporary accommodation. This will result in</p>	<p>Well managed allocation policy, and clear banding guidelines.</p> <p>Online form to allow early access to support, including linking to help hub infrastructure.</p> <p>Current team resources in place and funded. Ukraine and cost of living programmes establishment and working well</p> <p>Housing enablement partnership in place to consider options to increase additional stock.</p>	4	5	20	Reduce	<p>1. Maintain current staff resource levels, which is being worked through in customer journey report. (completed)</p> <p>2. Additional funding to provide temporary accommodation to ensure adequate emergency options are available to residents (completed)</p> <p>3. Temporary Accommodation review looking at future housing options</p>	Assistant Director of Individuals and Families	Cllr Natasha Harpley	<p>1. Staff resource in place until 2024 (completed)</p> <p>2. In place from Oct 2022 (completed)</p> <p>3. Report completed</p> <p>4. Ongoing</p> <p>5. Ongoing.</p> <p>6. Ongoing.</p> <p>7. Ongoing.</p> <p>8. By 31 Mar 24</p>	2	5	10	No	<p>No change to risk score</p> <p>Temporary accommodation has been purchased. A cost of living policy report is being prepared for March 2024 to understand the future needs of residents to inform policy.</p>

															Inherent Risk (if no further action taken)																Mitigated Risk															
Objective	Ref	Risk description	Existing Controls	Likelihood	Impact	Severity score	Risk Response	Planned mitigating actions	Risk Owner	Portfolio Holder	Delivery timescales	Likelihood	Impact	Severity score	Within Risk Appetite?	Comments and progress on actions																														
Protecting and improving our natural and built environment, whilst maximising quality of life / Growing the Economy	BDC P3	<p>Risk - Implications arising from the Government's Resources and Waste Strategy and the Environment Act 2021</p> <p>Consequence - Requirement for significant changes to service delivery, increased costs and loss of income</p>	Currently there is very little clarity from the Government on the precise details, timelines or funding that will be provided or income that could be lost following the introduction of the Deposit Return Scheme, Extended Producer responsibilities and Consistency of Collections. Officers continue to attend Defra Webinars and are undertaking scenario planning.	5	5	25	Reduce	<ol style="list-style-type: none"> Lobby government for adequate funding for the implementation of the proposed changes. Respond to Government Consultations to ensure sufficient time and funding is provided to implement the changes. Feed into any relevant networks e.g. LGA and DCN to influence policy direction and implementation. Ensure local MPs are aware of the financial and service implications. Ensure the necessary up to date information is fed into Waste Data Flow. Undertake scenario for each planned service strand change to understand the potential implications. 	Assistant Director Community Services	Cllr Jan Davis	Ongoing	5	4	16	No	<p>Risk score reduced</p> <p>1-6 Officers continue to attend Defra workshops on the proposals.</p> <p>All information on Waste Data Flow has been updated and a benchmarking exercise has been undertaken for the Council by WRAP.</p>																														

De-escalated/closed risks in 23/24

Risk Ref	Reason risk was de-escalated/closed	Quarter risk was de-escalated/closed
BDCP2 - The inability to find Gypsy Traveller (G&T) sites to meet the need and enable the Greater Norwich Local Plan to be found sound	Mitigated risk score reduced due to positive progress against mitigating actions. To be managed at an operational level via the Place Directorate Risk Register	Q2
BDCP1 - Nutrients Neutrality advice impacts all planning decisions for overnight accommodations.	Mitigated risk score has reduced to reflect the recent Government announcement. This will be monitored closely as the Levelling Up and Regeneration Bill makes its way through Parliament. To be managed at an operational level via the Place Directorate Risk Register	Q2
BDCM3 - The Council is unable to take advantage of the benefits and opportunities from collaborative working with South Norfolk Council and other key partners through autonomous policy decision-making.	Mitigated risk score has been within risk appetite for the past year. To be managed at an operational level via the Resources Directorate Risk Register	Q2

Risk likelihood and impact matrix

Likelihood Matrix			
Likelihood	Description	Timing	
5	Expected	Risk event or circumstance is relatively certain to occur	More than once per year
4	Highly Likely	Risk event or circumstance is highly likely to occur	Once per year
3	Likely	The risk event or circumstance is more likely to occur than not	At least once between 1-5 years
2	Not likely	The risk event or circumstance is possible	At least once between 5-10 years
1	Rare	This will probably never happen	Probably within 10-15 years

Impact Type	Impact Matrix				
	Insignificant	Minor	Moderate	Significant	Severe
Financial loss	£0k - <£10k	£10k - <£25k	£25k - <100k	£100k - £500k	Over £500k
Service provision	Inconsequential disruption to a service.	Minimal disruption to Council activities/service.	Significant disruption to service delivery.	Significant disruption to large parts of the Council or suspension of service.	Service suspended long term.
Projects	Minor delay	Minor milestones missed	Significant milestones missed or delayed	Major milestones missed	Project will not achieve objectives and misses majority of milestones
Objectives	No effect	Some team objectives not met	Team objectives not met	Portfolio objectives not met	Strategic objectives not met
Health and Safety	Isolated incident/injury/illness. No lost time to injury days.	Minor injury or illness requiring medical treatment.	Threat of violence, serious injury or illness requiring medical attention.	Significant/extensive/multiple injury or illness, permanent or partial disability.	Fatality. Multiple major injuries/illness. Permanent total disability.
Staff Engagement	Isolated events of dissatisfaction	Some hostile relationships/minor non-co-operation	Hostile relationships. Major non-co-operation across the organisation	Industrial Action	Mass staff walkout/leaving
Reputational	Minor unfavourable social media coverage/attention	No media coverage. Minor letters of complaint	Adverse local media/social media coverage relating to conduct of leader or members or Council	Adverse national media exposure	Prolonged adverse national exposure
Statutory/Legal	Isolated non-compliance. Informal recommendation not followed up.	Non-compliance Warning received	Breach. Improvement Notice	Enforcement Action	Prosecution Fine Successful Judicial Review



Cabinet
19 March 2024

ADOPTION OF THE GREATER NORWICH LOCAL PLAN

Report Author: Mike Burrell
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Portfolio: Policy; and Planning

Wards Affected: All

Purpose of the Report:

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

Recommendations:

It is recommended to Cabinet that Council:

1. notes the inspectors' report (at Appendix A) and the required main modifications in appendices 1 to 5 (available from [this link](#));
2. adopts the modified GNLP (documents J2.1 to J2.11 inclusive available from [this link](#)); and
3. delegates authority to the Assistant Director for Planning to publish the Adoption Statement and accompanying documents, making the GNLP part of the Adopted Local Plan for Broadland.

1. Summary

- 1.1 The report by independent Inspectors Mike Worden BA (Hons) Dip TP MRTPI and Thomas Hatfield BA (Hons) MA MRTPI into the soundness and legal compliance of the Greater Norwich Local Plan (GNLP) has been received. In line with the requirements of the Regulation 25 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), a publication notice and the inspectors' report were published on the GNLP and the partners' websites on February 20th. Interested parties were also notified of the publication of the report.
- 1.2 The inspectors conclude that, subject to the inclusion of the main modifications they recommend being incorporated into the plan, the GNLP is sound and can be adopted as part of the local plans for Broadland, Norwich and South Norfolk.
- 1.3 This report provides a summary of the development and content of the GNLP and of the inspectors' examination conclusions. It proposes that Council adopts the modified GNLP.
- 1.4 Appendix A contains the inspectors' report which summarises the main modifications required to make the plan sound. These changes are detailed in appendices 1 to 5 (documents J1.2 to J1.6 inclusive available from [this link](#)).
- 1.5 The GNLP, including the main and additional (minor) modifications, is in documents J2.1 to J2.11 inclusive available from [this link](#).
- 1.6 If the councils resolve to adopt the GNLP, Adoption Statements will be placed on each of the three councils' websites in line with Regulations 17 and 26 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 1.7 The Sustainability Appraisal of the plan consists of a number of documents. It is available from section J4.2 [here](#). To meet the requirements of Regulation 16 of the SEA Regulations, an Environmental Adoption Statement will be published with the GNLP's Adoption Statements. It is available in section [J4.1](#) here.

2. Background

- 2.1 Greater Norwich has an excellent record of partnership working. We were one of the first partnerships nationally to adopt a joint local plan, the Joint Core Strategy, in 2011 (only 16 areas have adopted joint plans in England).
- 2.2 Since 2013, we have taken a successful and unique approach by pooling Community Infrastructure Levy (CIL) income from developers to help to pay for the infrastructure improvements we need. We have also worked with all the Norfolk planning authorities and with infrastructure providers and environmental bodies to plan together for our strategic needs across the county and with Suffolk. As a result, growth has been well-planned, with new infrastructure delivered to support it, whilst at the same time protecting and enhancing our special environment.

- 2.3 Local plans set the development framework for an area, usually for the next 15 years. To do this, they:
- Contain planning policies which are the basis for deciding whether to approve planning applications.
 - Allocate sites for development, including homes and employment sites, which respond to evidenced local needs and opportunities.
 - Ensure that buildings and places are sustainable, beautiful and of a high quality.
 - Facilitate the delivery of local infrastructure, such as new schools, health and community facilities, transport, and green infrastructure such as parks, street trees, local wildlife areas and woodlands.
 - Protect and enhance the natural, built and historic environment.
 - Respond to climate change and support nature recovery.
- 2.4 National policy requires local planning authorities (LPAs) to have local plans which reflect recent changes to the National Planning Policy Framework (NPPF) submitted by the end of June 2025 and adopted by December 2026. Government evidence on local plan progress shows that it takes 7 years, on average, to produce a local plan and that approximately 35% of LPAs have adopted a local plan in the last 5 years.

3. Current positions/findings

The GNLP and other local plan documents

- 3.1 On adoption, the GNLP will supersede the current JCS and the Norwich and Broadland site allocations plans, along with the majority of South Norfolk's site allocations plan. It consists of the strategy for growth, the site allocations to implement that strategy and a monitoring framework. Resulting changes to the adopted Policies Map are available in section J3 [here](#).
- 3.2 Allocations will be made in a separate plan in the smaller villages in South Norfolk through the South Norfolk Village Clusters Housing Allocations Local Plan. The Diss, Scole and Burston area allocates sites through their Neighbourhood Plan.
- 3.3 As well as making new site allocations, the great majority of the undeveloped sites in the site allocation plans adopted around a decade ago are re-allocated through the GNLP.
- 3.4 The GNLP will not replace existing adopted Area Action Plans (AAPs) for Long Stratton, Wymondham and the Growth Triangle (NEGT), though in some cases additional allocations are made through the GNLP in these areas. The GNLP will be used in conjunction with the adopted AAPs, development management (DM) plans for the three districts and Neighbourhood Plans.

The GNLP Strategy

- 3.5 The growth strategy in the GNLP builds on and further develops the strategic approach taken in Greater Norwich in recent years and has been developed

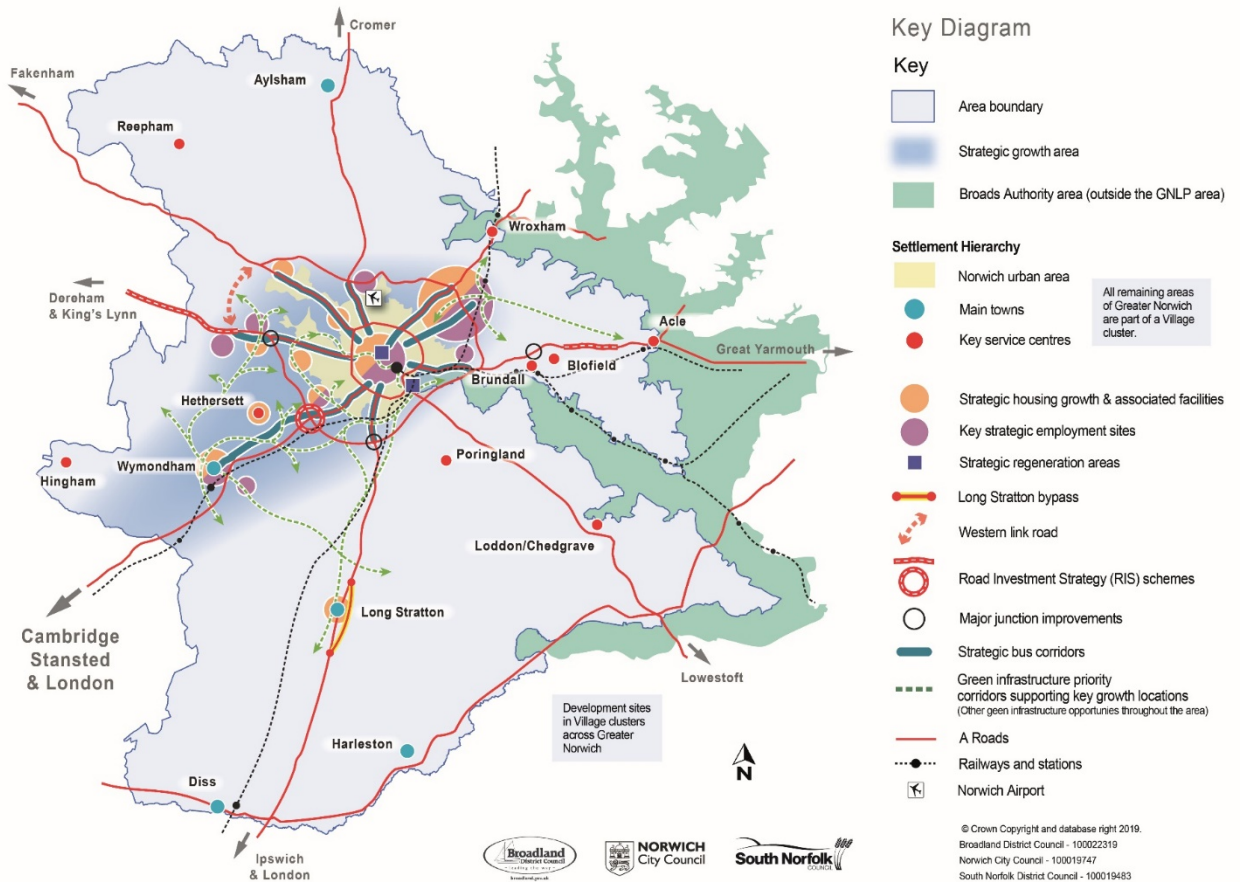
through detailed community and stakeholder consultation. Its development has taken account of a broad range of issues and views. It is well-evidenced, meets the plan's objectives and has now been endorsed by the government appointed inspectors through its examination.

- 3.6 The GNLP provides for up to 45,050 new homes, a jobs target of 33,000 jobs and 360 hectares of employment land from 2018 to 2038. It will ensure that Greater Norwich's housing and jobs needs will be fully met in a sustainable manner, supporting the growth of the post carbon economy, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.
- 3.7 This will be achieved through the strategy focussing the great majority of growth in and around the Norwich urban area and the fringe parishes, the towns and the larger villages, together with some growth in smaller villages to support local services as follows:
- 62% of the new homes will be in the Norwich urban area and the fringe parishes. These homes will be provided firstly through infill and regeneration sites (including East Norwich) to maximise brownfield capacity and secondly on urban extensions. The largest urban extension is the Growth Triangle to the north-east of the city in Broadland, providing just over 10,000 homes to 2038, as well as jobs and infrastructure (including a secondary school). This now includes a new strategic allocation at White House Farm, Sprowston. Extensions to the north-west of the city at Taverham (a new strategic allocation), to its west at Easton, Costessey and Three Score and south-west at Cringleford provide other strategic housing growth locations.
 - 15% of the new homes will be in the main towns. There are new sites in Aylsham, Diss (partly through its Neighbourhood Plan), Harleston and Wymondham, with no additional sites in Long Stratton.
 - 8% of the homes will be in the key service centres (new sites are allocated in Acle, Blofield, Hingham and Loddon).
 - 9% of the homes will be in the village clusters covering the remaining rural areas of Broadland and South Norfolk. These sites will provide growth to meet local needs and support local services.
 - 6% of the homes will be provided by windfall development.
- 3.8 The strategy provides the great majority of employment land at strategic sites (at Norwich City Centre, the Norwich Airport area, Browick Interchange Wymondham, Longwater, Rackheath, Broadland Business Park, Broadland Gate, Norwich Research Park, Hethel and the Food Enterprise Park at Easton/Honingham). Allocations also provide smaller sites with local job opportunities.
- 3.9 The strategy includes a strategic growth area promoting Greater Norwich's economic strengths and sectors and linking via the Cambridge Norwich Tech Corridor to other regional and national growth corridors centred on Cambridge. The increased focus on the strategic growth area defined in the GNLP assists consideration of future strategic approaches, potentially including a new settlement or settlements.
- 3.10 This approach will both assist the ability to access external funding and emphasise the role that Norwich, in particular the city centre as a regional centre

for jobs, retailing, leisure, entertainment and cultural activities, and the Norwich Research Park (NRP) for employment, play as a driver of the regional economy, generating travel and contributing to the economy. This strong focus on the strategic growth area will assist strong economic growth in the area. It will also provide for the co-location of jobs and homes, providing strong links to services, education opportunities and other facilities, at the same time promoting active and sustainable travel.

- 3.11 The strategy also promotes the protection and enhancement of the built and natural environment and local landscapes. This is done through the further development of the green infrastructure network and the retained strategic focus on continued protection of river valleys and strategic gaps.
- 3.12 The GNLP promotes a pro-active approach to housing delivery through only allocating housing sites where a reasonable prospect of delivery has been evidenced. The plan also provides choice and flexibility by ensuring there are enough committed sites to accommodate 11% more homes than “need”, should they be required to offset any non-delivery. Additional opportunities will be provided through windfall development.
- 3.13 As such, the proposed strategy offers the opportunity to strengthen Greater Norwich’s role as a key part of the national economy. Economic growth in Greater Norwich is set to be in key sectors that will assist in the national and international adaptation to a post carbon economy, including in plant sciences and high value engineering.
- 3.14 Taken together, these measures will ensure that housing needs to 2038 will be fully met in sustainable manner, supporting the growth of the post carbon economy in Greater Norwich and more widely, assisting in tackling climate change and protecting and enhancing the many environmental assets of the area.
- 3.15 The GNLP Strategy is summarised in the plan’s Key Diagram below.

Greater Norwich Local Plan (GNLP) Key Diagram



GNLP Plan-making Stages

- 3.16 The publication of the inspectors' report is the end of the GNLP's examination. The independent planning inspectors, who are appointed by the Planning Inspectorate on behalf of the Secretary of State, have assessed the soundness of the submitted plan through its examination.
- 3.17 Plans are 'sound' if they are:
- Positively prepared – i.e. it provides a strategy which, as a minimum, meets the area's objectively assessed needs and is informed by agreements with other authorities;
 - Justified – it is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective – it is deliverable over the plan period, and is based on effective joint working on cross-boundary strategic matters as evidenced by a statement of common ground;
 - Consistent with national policy – it enables the delivery of sustainable development in accordance with national policies.
- 3.18 In line with regulatory requirements, the following stages have been undertaken in producing the GNLP:

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

Examination Hearings

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

Inspectors' Letter

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

Main and Additional Modifications

- 3.21 Almost all local plans require main modifications to be made to them.
- 3.22 The main modifications were subject to consultation between October 25th and December 6th 2023. Consultation feedback was received from 67 respondents who made 257 individual representations. Many of the responses did not raise soundness issues and some comments only focussed to a limited extent on the main modifications, instead returning to issues already addressed through the examination, such as objecting to specific site allocations or requesting the inclusion of sites not allocated in the plan.
- 3.23 The Inspectors took note of the partnership's view on the consultation comments, along with the other comments made, in concluding on the modifications that are needed to make the plan sound. In this light, the Inspectors have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity.

Where the Inspectors' feel it is appropriate, their report references their response to specific soundness issues raised.

- 3.24 Additional modifications, mainly to supporting text rather than policies, have also been made. These are largely updates and clarifications which do not relate to the soundness of the plan. They do not form part of the inspectors' examination of the plan and were available for reference rather than being part of the main modifications consultation. They include:
- Factual updates to supporting text, especially in the spatial profile e.g. new census data.
 - References to changes in national policy e.g. the Levelling Up and Regeneration Act (LURA) and nutrient neutrality requirements.
 - Progress on infrastructure schemes.
 - National targets for reduction in greenhouse gas emissions.
 - Removal of footnotes and replacement with references in text where required.
- 3.25 Further factual updates have been made to the additional modifications to reflect the final outcome of the plan's examination and the passage of time.
- 3.26 Taking account of the examination hearings and the consultation feedback, the modifications to the plan which they have concluded are necessary to make the GNLP sound have been included in the Inspectors' Report.

The Inspector's Report

- 3.27 The inspectors' report concludes that with the specific main modifications, the plan satisfies legal requirements and meets the criteria for soundness in the NPPF. However, the councils can only adopt the plan if they incorporate the modifications that the inspectors view as necessary to make the plan sound. Consequently, the councils must now consider whether or not to adopt the plan in the light of the inspectors' report and recommendations.
- 3.28 The inspectors' report in Appendix A begins with a Non-Technical Summary, an Introduction and a section providing the context for the plan. The Non-Technical summary of the main modifications requires:
- Amending Policies 2 and 3 for clarity, consistency with national planning policy, to reflect updated evidence, and in light of Natural England advice on nutrient neutrality mitigation;
 - Amending Policy 7.5 so that it relates solely to self/custom build housing;
 - Deleting Policy 7.6 for new settlements;
 - Deleting the Costessey Contingency Site Allocation;
 - Deleting those site allocations which are not justified;
 - Amending site allocation policies to remove ambiguity and clarify development requirements;
 - Allocating sites for Gypsy and Traveller needs;
 - Updating the housing supply figures and housing trajectory to reflect the evidence;
 - Replacing the monitoring framework;

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

Soundness

- 3.30 The Inspectors identified nine main “soundness” issues which were investigated through the examination and conclude that if the modifications they recommend are made:
- The Plan’s overall spatial strategy is based on robust evidence and is justified and effective. They consider that the spatial distribution across the Plan area is logical, it has been selected following consideration of reasonable alternatives and is an appropriate strategy as required by the NPPF.
 - The housing requirement of 40,541 homes for the Plan period, based on the standard methodology using 2014 based projections, is justified and consistent with national policy. Also, the Plan’s jobs target of 33,000 jobs, and the allocation of around 360 hectares of employment land, are sound.
 - The strategy for the economy and areas of growth is justified, effective and consistent with the evidence. This includes the approach taken on village clusters and a modified approach to small-scale windfall housing in policy 7.5 to place its focus on self and custom build housing. The Inspectors also conclude that a review of the Local Plan will need to assess options for longer term growth which may include the potential for a sustainable new settlement or settlements.
 - The Plan policies relating to Sustainable Communities (policy 2 covering various aspects of design, including accessibility, density, designing out crime, water efficiency, and energy consumption) and Environment Protection and Enhancement (policy 3 covering the built, historic and natural environment, and

modified to cover nutrient neutrality) are justified, effective and consistent with national policy.

- With a modification to clarify that strategic infrastructure schemes in policy 4 being progressed by other bodies including Norfolk County Council and National Highways, such as the Norwich Western Link, are not required to deliver any allocation, the Plan accords with the evidence and is justified and effective.
- The Plan's approach to the provision of affordable housing, Gypsy, Traveller and Travelling Showpeople accommodation, self and custom build housing, and the housing needs of other groups, is justified, effective and consistent with national policy.
- The Partnership's approach to site assessment and selection for both general housing and Gypsy and Traveller accommodation is appropriate and is justified. Thus, the vast majority of the proposed site allocations in the submitted plan are retained. Paragraphs 3.31 to 3.33 below identify the limited number of submitted sites which are not included in the plan for adoption and those sites for which site capacity and delivery assumptions have been changed. The housing trajectory, now in Appendix 4 of the GNLP, has been amended to reflect these changes.
- The plan provides a 5-year supply of 12,632 homes for the Greater Norwich area, which is a supply of 5.77 years. It also demonstrates a 5-year supply of Gypsy and Traveller pitches.
- The revised Monitoring Framework, which now includes targets, triggers, and actions and is in a separate third document of the plan, provides a sound and effective basis for monitoring the Plan.

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

- i. South of Le Neve Road, Marsham GNLP2143 for 35 homes due to impacts on the neighbouring church.
- ii. Mill Road Reedham GNLP3003 for 30 homes due to poor access.
- iii. The contingency site at Costessey.
- iv. Other housing sites removed by landowners:
 - Ber Street (CC2), Norwich for 20 homes.
 - Lower Clarence Road (CC13), Norwich for 45 homes
 - Ipswich Road Community Hub (R2), Norwich for 15 homes
 - Land north of Springfield Way and west of Dereham Road, Hingham for 20 homes.

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

3.33 In addition, site capacity and delivery assumptions have been changed from the submitted plan on some sites. This includes East Norwich (3,000 homes are now

assumed to be delivered in the plan period) and White House Farm, Sprowston, where there has been a loss of 660 dwellings from the delivery trajectory to 2038.

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

4. Proposed action

Securing Plan Adoption

- 4.1 The publication of the inspector’s report enables the councils to proceed to adoption of the GNLP. It requires the main modifications to be included in the adopted plan to make it sound. As stated above, these changes are binding - a plan can only be adopted with their inclusion.
- 4.2 The decision to adopt the plan must be made by each of the three councils. Full Council meetings are scheduled in each authority in March 2024. Adoption of the GNLP involves the publication of an adoption statement the day after each authority adopts the plan. This is accompanied by the GNLP as amended by the inspectors’ modifications, the inspector’s report, the sustainability appraisal, an environmental adoption statement and the habitats regulation assessment. These are available from [here](#). An Environmental adoption statement will also be available.
- 4.3 Legal challenges can be made within 6 weeks of the adoption of a local plan. An application to the High Court can be made either on the grounds that the document is not within the appropriate power of the LPA, or that a procedural requirement has not been complied with.
- 4.4 Once the risk of legal challenge has passed, the production of the final online and hard copy documents to publication standard can be undertaken.

5. Other options

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

6. Issues and risks

- 6.1 **Resource Implications** – Work on the plan first began in 2016 and has involved a significant commitment of resources. Adopting the GNLP marks a significant achievement, and the new plan will play an important role in guiding the creation of new jobs and homes whilst protecting the environmental assets of the area.

- 6.2 **Legal Implications** – The preparation and content of a local plan needs to accord with a range of legal and regulatory provisions. Project assurance, including taking relevant legal advice, has been undertaken as part of the plan-making and examination process.
- 6.3 **Equality Implications** – The plan encourages growth of vibrant and healthy communities with good access to jobs, services and facilities, helping to reduce disparities between the life chances of disadvantaged and other communities. New communities will be well-integrated with existing communities and will be safe and attractive places to live. An [Equality Impact Assessment](#) has assessed the impact of the local plan on the community and its potential to address socio-economic inequality.
- 6.4 **Environmental Impact** – A Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), and a Habitat Regulations Assessment (HRA) support the GNLP. The SA has explicitly considered the policies and sites allocated through the plan. The HRA has focused on nutrient neutrality and visitor pressure on internationally protected habitats.
- 6.5 The GNLP’s Climate Change statement sets out how the plan seizes the opportunities available locally to promote low carbon development and address climate change. This includes the location of development and its design, with policies reducing the need to travel, promoting water efficiency, sustainable energy provision and recycling, and requiring development to be adapted to the address the impacts of climate change, including flood risk. The plan has a particular focus on ensuring that new development provides biodiversity net gain and new green infrastructure (GI) as part of a wider GI network.
- 6.6 **Crime and Disorder** – This report has implications for the council’s crime and disorder considerations in that new development is required to reflect best practice to deter crime through its design and layout. In addition, the supporting text in the plan advises planning applicants to contact Norfolk Constabulary for guidance on crime and safety issues.
- 6.7 **Risks** – Since the plan has successfully been through examination and has been found to be sound subject to including the Inspectors’ main modifications, risks relate to non-adoption of the plan. Non-adoption of the plan would lead to more speculative development in unplanned locations, potential government intervention in plan-making and would be likely to reduce both government and private investment in the area. Such risks will be addressed by adoption of the plan.

7. Conclusion

- 7.1 Overall, the inspectors’ report is very positive, and the successful development of an updated joint strategy is a considerable success.
- 7.2 Adoption of the GNLP will allow us to implement evidence-based policies for our area through a plan which the partnership has invested considerable time and money in. While it has been a long process to get the GNLP to adoption, national

data shows that the seven years taken is the average under the current local plans system.

- 7.3 The GNLP builds on our extensive experience of joint working to identify where growth and new infrastructure is needed from 2018 to 2038. Plan adoption will keep us at the forefront of joint planning nationally which will help us to attract investment into the area, including Government funding, especially for infrastructure and regeneration programmes. Only one other partnership, Central Lincolnshire, has adopted a review of a joint plan.
- 7.4 The plan will deliver high-quality homes, along with a broad range of new jobs and supporting infrastructure, including green infrastructure, roads, schools, health care facilities and broadband connectivity. The plan includes a range of policies which will ensure that the development is in the best locations to support our existing communities and to create thriving new communities, as well as making sure that development is well-designed, and is sustainable.
- 7.5 The councils' strategy for the distribution of the majority of growth in the Strategic Growth Area focussed on the Norwich Urban Area and the Cambridge Norwich Tech Corridor, with some growth also focussed at other levels of the hierarchy to support thriving communities and the retention of services, has been fully endorsed. This further develops the long-term strategic approach set through the JCS. It also allows for a future focussing of growth on new settlements if this is the path which the authorities choose to take in their next plan or plans.
- 7.6 Adoption of this coherent strategic plan will mean that Greater Norwich will have an up-to-date local plan with a clear and sustainable policies and site allocations that will promote environmental protection, investment in our economy and the provision of the homes, jobs and infrastructure we need, including through the continued use of pooled CIL monies.
- 7.7 Importantly, recent revisions to the NPPF mean that for 5 years after adoption of the plan, there will be no need to annually demonstrate a five-year land supply for Greater Norwich. This will significantly reduce the pressure to grant permissions for non-allocated housing sites that currently exists as there is not, at this point, a 5-year land supply. This further increases the benefits of having an adopted plan.
- 7.8 There could potentially be some very serious negative impacts associated with not adopting the plan. Firstly, the uncertainty created by not having an adopted strategy and not having a 5-year land supply would increase the prospect of speculative or inappropriate proposals being submitted, resulting in "planning by appeal". Secondly, there is a very real threat of Government intervention for those LPAs which are not making sufficient progress on their plans to have an adopted plan in place by December 2026. Ten local planning authorities had the Secretary of State intervene in their local plan process in the last three months of 2023. Seven were required to update their Local Development Schemes to make clear when their plans are to be adopted, whilst three (Spelthorne BC, Erewash BC and West Berkshire Council) were instructed not to withdraw their draft plans from examination. It seems highly likely that there would be Government intervention if one or more of the Greater Norwich authorities were not to adopt the GNLP. Given

the amount of consultation it has gone through and the successful outcome of its examination, it is also possible that there could be a legal challenge and significant resulting costs to non-adoption of the GNLP.

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

8. Recommendations

8.1 It is recommended to Cabinet that Council:

1. notes the inspectors' report (at Appendix A) and the required main modifications in appendices 1 to 5 (available from [this link](#));
2. adopts the modified GNLP (documents J2.1 to J2.11 inclusive available from [this link](#)); and
3. delegates authority to the Assistant Director for Planning to publish the Adoption Statement and accompanying documents, making the GNLP part of the Adopted Local Plan for Broadland.

Background papers

Report to Broadland District Council, Norwich City Council and South Norfolk Council, by Mike Worden BA (Hons) Dip TP MRTPI and Thomas Hatfield BA (Hons) MA MRTPI, 19 February 2024

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

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

Inspectors appointed by the Secretary of State

Date: 19 February 2024

Report on the Examination of the Greater Norwich Local Plan

The Plan was submitted for examination on 30 July 2021

The examination hearings were held:

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

File Ref: PINS/G2625/429/9

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Abbreviations used in this report

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

Non-Technical Summary

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

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

The main modifications can be summarised as follows:

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

Introduction

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

Main Modifications

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

Policies Map

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

Context of the Plan

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

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

Public Sector Equality Duty

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

Assessment of Duty to Co-operate

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

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

Assessment of Other Aspects of Legal Compliance

Sustainability Appraisal

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

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

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

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

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

Habitats Regulations Assessment

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

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

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

Other

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

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

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

Assessment of Soundness

Main Issues

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

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

The Plan Period

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

The Vision for Greater Norwich 2038

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

Strategic Policies

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

The Growth Strategy

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

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

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

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

Conclusion

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

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

Housing Need and Requirement

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

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

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

Employment Need and Requirement

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

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

Conclusion

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

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

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

Policy 6 - The Economy

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

Policy 7.1 - The Norwich Urban Area including the Fringe Parishes

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

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

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

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

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

Policy 7.2 - The Main Towns

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

Policy 7.3 - The Key Service Centres

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

Policy 7.4 - Village Clusters

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

Policy 7.5 - Small Scale Windfall Housing Development

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

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

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

Policy 7.6 - Preparing for New Settlements

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

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

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

Conclusion

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

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

Policy 2 Sustainable Communities

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

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

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

Policy 3 Environmental Protection and Enhancement

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

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

98. A Written Ministerial Statement on Nutrient Neutrality in River Basin Catchments was issued during the examination, and Natural England wrote to a number of planning authorities to advise that as a competent authority under the Habitats Regulations, they should carefully consider the nutrient impacts of any new plans, policies and development proposals. This affects sites within the catchments of the Wensum Special Area of Conservation, the Broads Special Area of Conservation and the Broadland Ramsar, which cover most of the Plan area. The Partnership subsequently produced a Nutrient Neutrality Mitigation Strategy and a viability study addendum, and it agreed a statement of common ground with Natural England. As a result, modifications to Policy 3 were proposed that would require applicants to provide evidence, through a HRA, that relevant proposals would not adversely affect the integrity of sites in an unfavourable condition. This modification is necessary to ensure that the Plan accords with national planning policy and the Habitats Regulations.
99. **MM9** makes the above changes to Policy 3.

Conclusion

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

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

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

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

Conclusion

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

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

Affordable Housing

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

Gypsy, Traveller, and Travelling Showpeople Accommodation

Need and requirement

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

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

Transit provision

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

Site allocations

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

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

Criteria in Policy 5

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

Self and Custom Build Housing

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

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

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

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

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

Purpose-built Student Accommodation

127. Policy 5 is supportive of purpose-built student accommodation within the University of East Anglia ('UEA') campus. This approach is justified and is supported by site allocations within the campus area. However, a modification is necessary to clarify that proposals should only have regard to, rather than accord with, the UEA Development Framework Strategy as this is not a Development Plan Document. A further modification is required to clarify that purpose-built student accommodation within the UEA campus will not be required to provide an affordable housing contribution, as these sites would not be suitable for general needs housing given their campus location.
128. Away from the UEA campus, the policy sets criteria against which applications for purpose-built student accommodation would be assessed. Modifications to this part of the policy are necessary for precision, and to clarify that an offsite affordable housing contribution will be sought. The requirement to "*make provision for a policy compliant proportion of affordable housing that would be expected if the site were developed for general needs housing*" is deleted as it is ineffective. In this regard, it is not clear how the amount of affordable housing

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

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

Accessible and Specialist Housing

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

Conclusion

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

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

Site Assessment Process

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

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

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

Sequential and Exception Tests

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

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

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

General Site Allocation Matters

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

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

Modifications that apply to multiple site-specific policies

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

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

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

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

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

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

Housing and Mixed Use Site Allocations

Norwich

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

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

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

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

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

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

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

Land adjoining the Enterprise Centre at Earlham Hall (GNLP0133BR)

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

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

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

Land between Suffolk Walk and Bluebell Road (GNLP0133DR)

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

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

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

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

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

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

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

Land at Whitefriars, Norwich (GNLP0409AR)

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

Land south of Barrack Street, Norwich (GNLP0409BR)

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

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

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

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

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

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

Land at and adjoining Anglia Square (GNLP0506)

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

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

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

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

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

Friars Quay Car Park, Colegate (GNLP2163)

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

Land west of Eastgate House, Thorpe Road (GNLP2164)

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

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

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

14 Ber Street, Norwich (CC3)

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

Land at Rose Lane/Mountergate (CC4a)

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

Land at Mountergate/Prince of Wales Road (CC4b)

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

Hoborough Lane, King Street (CC7)

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

King Street Stores, Norwich (CC8)

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

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

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

Land at Argyle Street, Norwich (CC11)

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

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

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

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

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

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

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

Land to rear of City Hall, Norwich (CC24)

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

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

Westwick Street Car Park Norwich (CC30)

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

John Youngs Limited 24 City Road (R7)

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

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

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

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

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

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

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

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

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

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

Land north of Windmill Road, Norwich (R19)

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

Land east of Starling Road, Norwich (R20)

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

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

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

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

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

Mile Cross Depot, Norwich (R36)

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

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

The Norwich Community Hospital site, Bowthorpe Road (R37)

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

Three Score, Bowthorpe (R38)

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

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

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

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

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

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

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

The Urban Fringe

Colney Hall, Watton Road, Colney (GNLP0253)

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

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

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

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

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

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

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

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

Land south and east of Easton (EAS 1)

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

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

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

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

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

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

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

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

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

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

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

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

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

218. **MM87** addresses these issues.

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

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

Land off Beech Avenue, Taverham (GNLP0159R)

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

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

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

Main Towns

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

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

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

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

Land at Norwich Road, Aylsham (GNLP0596R)

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

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

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

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

Land south of Spirketts Lane, Harleston (GNLP2108)

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

Land at Spirketts Lane, Harleston (HAR 4)

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

Land off Station Hill, Harleston (HAR 5)

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

Land at Briar Farm, Harleston (GNLP2136)

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

Land at Johnson's Farm, Wymondham (GNLP0354R)

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

Land at Tuttlles Lane, Wymondham (GNLP3013)

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

Key Service Centres

Land west of Acle (GNLP0378R/GNLP2139R)

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

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

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

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

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

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

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

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

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

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

Land north of Hethersett (HET 1)

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

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

Land north of Grove Road, Hethersett (HET 2)

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

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

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

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

Land south of Norwich Road, Hingham (GNLP0520)

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

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

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

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

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

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

Land off Langley Road, Chedgrave (GNLP0463R)

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

Land off Broomhill Lane, Reepham (REP1)

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

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

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

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

Village Clusters

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

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

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

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

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

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

Land east of Lion Road, Buxton (BUX1)

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

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

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

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

Land at Rectory Road, Coltishall (COL1 and GNLP2019)

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

Land at Jordans Scrapyard, Coltishall (COL2)

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

Land west of Foundry Close, Foulsham (GNLP0605)

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

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

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

South of Bowlers Close, Freethorpe (GNLP2034)

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

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

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

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

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

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

Dog Lane, Horsford (GNLP0264)

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

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

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

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

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

West of Blofield Road, Lingwood (GNLP0380)

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

East of Station Road, Lingwood (GNLP4016)

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

Land south of Le Neve Road, Marsham (GNLP2143)

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

Land to east of Station Road, Reedham (GNLP1001)

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

Mill Road, Reedham (GNLP3003)

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

Land adjoining Norwich Road, Salhouse (GNLP0188)

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

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

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

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

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

Employment Allocations

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

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

Land at The Neatmarket, Hall Road (R1)

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

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

Land at Holt Road, Norwich (R30)

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

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

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

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

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

Longwater Employment Area, Costessey (Policy COS3/GNLPSL2008)

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

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

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

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

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

Land north of Spirketts Lane, Harleston (HAR 6)

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

Land south of Spirketts Lane, Harleston (HAR 7)

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

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

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

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

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

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

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

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

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

Ex MOD site, Pine Loke, Poringland (POR3)

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

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

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

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

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

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

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

Brooke Industrial Estate, Brooke (BKE3)

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

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

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

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

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

Other Site Allocations and Site-specific Policies

Bawburgh and Colney Lakes (BAW2)

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

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

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

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

Royal Norfolk Showground, Costessey (COS5/GNLP2074)

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

Land northeast of Reepham Road Hellesdon (HEL4/GNLP1019)

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

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

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

Restriction of employment uses at Hethel (HETHEL 1)

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

Land west of Poppyfields, Hethersett (HET 3)

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

Land north of Berryfields, Brundall (BRU2)

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

Land east of the Memorial Hall, Brundall (BRU3)

306. This site was allocated in the Broadland Site Allocations DPD (2016). However, planning permission has subsequently been granted for housing on this site and the allocation is therefore not justified. **MM109** deletes the allocation and policy.

Costessey Contingency Site (GNLP0581/2043)

307. This site lies on the western edge of Norwich. It is a large site of around 62 hectares. The policy provides for it to come forward as a contingency site for an urban extension including around 800 homes, open space, a local centre and education facilities. The policy sets out a trigger mechanism whereby it could

come forward. This is based on three consecutive years of completions being more than 15% below target and then a second test that the under-delivery of committed and allocated sites is a result of site-specific constraints.

308. The Framework requires planning authorities to review plans within five years following adoption. It is likely that three consecutive Annual Monitoring Reports would not be available until into mid 2026 at the earliest. If there was significant under delivery of housing, the local planning authorities would have to consider the issue as part of the review of the local plan. The second part of the proposed trigger mechanism would require evidence that the under-delivery was as a result of site-specific constraints.
309. It is not clear to us how this would work effectively and the processes and approval mechanisms which would have to be followed to confirm the contingency site could come forward. There would then need to be a planning application submitted and it would be likely to be a further few years before the site was delivering homes. At the hearings the Partnership considered it not unreasonable to assume a further two years beyond the three AMR years, before houses could be delivered. The Partnership acknowledged that, as a result, there could be five years of persistent under delivery before a house was built at the contingency site. The Partnership also indicated at the hearings that it had not done any analysis as to whether the Costessey site would actually make any material difference to an overall under delivery position. We are therefore not convinced that the trigger mechanism in the submitted Plan would actually address the issues which it is designed to resolve.
310. We have considered the alternative trigger mechanism wording set out by the site promoter in its hearing statement and in its responses to the modification consultation. We do not agree that such wording either could make the Policy effective or justified. Although this Plan is being examined under the September 2023 version of the Framework, planning decisions post adoption would be made having regard to the advice in the revised Framework. The requirement to identify and update annually a supply of specific deliverable sites to provide a minimum of five years worth of housing sites would not apply for five years post adoption. The Housing Delivery Test would also not be a consideration for the local planning authority. We do not consider that it is justified to apply a different approach solely in the case of the contingency site.
311. Furthermore, we do not agree that the delay to progress on site delivery in the Plan area as a result of nutrient neutrality issues provides a justification for this policy. In this regard, we have carefully considered the impact of nutrient neutrality on affected sites in our assessment of land supply and the trajectory, and, through a new positively worded policy in the Plan for those sites yet to come forward.

312. We also do not agree that the case for a new sixth form college provides a justification for a contingency site allocation. If a school is needed to meet growth arising from housing sites in the Plan, then provision should be made on a site with certainty, not on a site which may only be delivered should completions on housing sites in the Plan area not progress as planned. That would leave the provision of the sixth form college reliant on other housing sites failing to deliver and that cannot be a sound basis for planning.
313. The Partnership told us at the hearings that the sixth form facility was not required to meet growth needs arising from the Plan. The site promoter takes a different view. However, the evidence before us is not convincing and it seems that there is a lack of co-ordinated planning between the education authority, the local planning authority and the site owner on this matter.
314. We conclude elsewhere in this report that there is a buffer of around 11% across the whole of the Plan area. We consider that this is sufficient to mitigate any slower than expected delivery on some sites and to provide flexibility in the market. We have arrived at that conclusion through a thorough and detailed assessment of each allocation and some of the larger commitments. It is also possible that there would be other options open to the Partnership to help address under-delivery which could be considered as part of a plan review or through decisions on planning applications.
315. For the reasons set out above, we consider that there is no convincing case for the site to be allocated as a contingency site, or as the site promoter seeks, a full allocation. The Policy is not justified and not effective and it is necessary to delete it.
316. **MM76 and MM149** are therefore necessary for the Plan to be effective and justified.

Gypsy & Traveller Allocations

Land off Buxton Road, Eastgate, Cawston (Ref GNLP5004R)

317. The site consists of an area of land on the northern side of Buxton Road, within the hamlet of Eastgate. It is located within a cluster of dwellings and is partially screened in longer views by mature trees and planting. Whilst the site was originally proposed for 4 pitches, that assumes an unrealistically high density for a site of this size. In this regard, it is likely to accommodate up to 2 pitches. The proposed access would be some distance from the bend in the road to the west, and sufficient space would be available to accommodate vehicle parking within the site. Accordingly, the allocation would not raise any highway safety issues, and the Highway Authority has not objected to the allocation on these grounds.

Moreover, the site would have reasonable access to services and facilities in Cawston, which is around 1 km away.

318. This site is appropriate to allocate for Gypsy and Traveller accommodation. **MM150** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land at the Oaks, Reepham Road, Foulsham (GNLP5022)

319. This site comprises an extension to the rear of an established Gypsy and Traveller site fronting onto Reepham Road. The proposed extension would have limited visibility in the surrounding area, and the site-specific policy requires that further landscaping and tree planting be undertaken. This would ensure that any impact on the landscape would be limited. Whilst the site is in a rural location, it has reasonable access to services and facilities in Foulsham, which is around 2 km away. Part of the site is subject to surface water flood risk, however, the site-specific policy wording requires that development in this area be avoided. In this regard, there is scope to accommodate 5 additional pitches without developing this area. In addition, the proposed extension of the site would not be of a scale that would dominate the nearest settled community.

320. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM151** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Brick Kiln Road Hevingham (Ref GNLP5027)

321. This site comprises an extension to the rear of an existing Gypsy and Traveller site. It is set back from the road and has limited visibility in the surrounding area. A small part of the site is subject to surface water flood risk, however, the site-specific policy requires that development in this area be avoided. In this regard, there is scope to accommodate 5 additional pitches without developing this area. The site would take access from a relatively straight section of Brick Kiln Lane and would generate only a modest amount of traffic. Moreover, the Highway Authority has also not objected to the allocation on safety grounds. In addition, the number of pitches proposed would not be of a scale that would dominate the nearest settled community.

322. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM152** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land north of Shortthorn Road, Stratton Strawless (GNLP5019)

323. This site comprises an extension to an established Gypsy and Traveller site on Shortthorn Road that would comprise 4 additional pitches. It would not be prominent when viewed from the road and would be seen in the context of the existing Gypsy and Traveller site and other neighbouring development. Whilst the site is adjacent to mature trees and grassland, this has not prevented the development and expansion of the adjoining site. It is around 2 miles from services and facilities in Horsford, which would provide a reasonable level of accessibility. The site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM153** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Romany Meadow, The Turnpike, Carleton Rode (GNLP5020)

324. This site comprises an extension of 6 pitches to an established Gypsy and Traveller site on The Turnpike. It is in a relatively prominent position next to the B1113, although mature trees and planting along its frontage partially screen the site from the road. The site-specific policy requires that further landscaping and tree planting be provided, and this would ensure that its visual impact would be minimised. Any residual views of the site from the north east would also be seen against the backdrop of the existing site. Whilst the site is in a rural location, it has reasonable accessibility to services and facilities in nearby villages. The scale of the allocation is proportionate to the existing site and its surroundings, and it would not dominate the nearest settled community, either alone or in combination with other sites. Part of the site is subject to surface water flood risk, however, the site-specific policy wording requires that areas subject to flood risk be avoided.

325. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM154** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land off Ugate Street, Carleton Rode (GNLP5024)

326. This is an existing under-utilised Gypsy and Traveller site, which contains 2 pitches at present. Given its size, there is scope to increase this number to 6 within the existing site boundary. The site is surrounded by mature hedgerows which screen it within the surrounding area, and the impact on the landscape would therefore be limited. Whilst the site is in a rural location, it has reasonable accessibility to services and facilities in nearby villages, including a primary school. There is no indication that the existing point of access has led to any highway safety issues, and the Highway Authority do not object to the

allocation. The scale of the site is such that it would not dominate the nearest settled community, either alone or in combination with other sites.

327. This site is available and is appropriate to allocate for Gypsy and Traveller accommodation. **MM155** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land east of Station Lane, Ketteringham (GNLP5013)

328. This site is owned by South Norfolk Council and is currently used as a depot for refuse collection vehicles. It is a brownfield site with reasonable access to services and facilities in Hethersett. The Council is seeking to relocate the depot and the site will become available in the medium term. It is appropriate to allocate for Gypsy and Traveller accommodation for around 10 pitches, and based on the available evidence, is likely to come forward in the timescales envisaged. **MM156** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.

Land at Strayground Lane, Wymondham (Ref GNLP5028 A & B)

329. This site consists of 2 parts - a cleared area of land to the south and a smaller recycling centre to the north. The recycling centre is due to be relocated to an alternative site in 2025, and the larger cleared area has been promoted as an allocation by the landowner. Both would be accessed via Strayground Lane, which is a narrow single-track road that leads onto Whartons Lane, and the junction with the B1172. Whilst this is a narrow route, the proposed Gypsy and Traveller allocation would generate significantly less traffic than the existing recycling centre. Evidence has also been submitted to show how existing passing places could be improved. Moreover, no collisions have been recorded at the junction between Whartons Lane and the B1172 in the last 5 years.
330. In these circumstances, we consider that access matters are capable of being dealt with at the planning application stage. The Partnership and site promoter will need to work with the Highway Authority to agree the necessary highway improvements consistent with the requirements of the policy. On the basis of the evidence before us, including the position of the Partnership who have proposed this site following consultation, we consider that the principle of the allocation is justified.
331. Given the reduction in traffic that would occur compared to the existing use, the allocation would not result in any harm to the attractiveness of Strayground Lane as a walking route. The site-specific policy also requires that boundary landscaping is installed which would enhance this route compared to the

existing situation. In terms of the proximity of the level crossing to the south, Network Rail have raised no objection to the allocation on this ground. Any pollution or ecological implications of the allocation are also capable of being dealt with at planning application stage.

332. This site is appropriate to allocate for Gypsy and Traveller accommodation. **MM157** allocates the site and introduces a site-specific policy that is necessary to guide its development and to ensure that the site is occupied by Gypsies and Travellers and their families only.
333. In terms of delivery timescales, most of the site is currently disused, and the site promoter stated that they are in discussions with a provider. Whilst the recycling centre would need to be relocated to free up the smaller element, that is only likely to accommodate a single pitch. In light of the above, there is a realistic prospect that development will be delivered on the site within 5 years.

Conclusion

334. Subject to the abovementioned MMs, the site allocations are consistent with the Spatial Strategy and the evidence, are justified and effective, and can be delivered in the timescales envisaged.

Issue 8 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy?

Overall Housing Supply

335. The Plan as submitted identified a total housing supply of 49,492 new homes, which provided a buffer of around 22% above the housing requirement. This supply included completions, commitments, windfalls, Plan allocations, and a contribution from the emerging SNVCHAP. As set out in this report under Issue 1, we consider that the overall housing supply is less than this at around 45,041 during the Plan period, which nonetheless provides for a significant buffer of around 11% above the housing requirement. This buffer will provide choice, flexibility, and mitigation against any under or non-delivery of housing sites within the Plan area. In addition, and as set out below, the assumed windfall allowance is very cautious and in practice is likely to be significantly exceeded.
336. During the examination, the Partnership updated its housing supply evidence to a base date of 31 March 2022. The submission of the updated evidence was at our request to ensure that the examination was based on the most up to date evidence. This provides an additional two years of housing completion data from that which is set out in the Plan. In total, it shows that there were 8,728

completions between 2018/19 and 2021/22. Updating the housing supply to 31 March 2022 has also led to an increase in extant planning permissions, from 31,452 to 34,688 dwellings. The updated supply evidence also takes account of errors and omissions and some updated information on site delivery.

337. The updated housing supply evidence also makes a change to the ratio at which student accommodation counts towards housing completions. This change now brings the ratio in line with the PPG. We consider this approach to be justified. Similarly, the proposed change in respect of how specialist older persons accommodation is converted into a housing figure is also justified.
338. As set out under Issue 7, some of the proposed housing allocations are not justified and the Plan has been modified in order to delete these sites. It is necessary to amend the housing trajectory to reflect this.
339. We have also altered certain assumptions regarding start dates, lead in times, and delivery rates on other allocations in the Plan. These assumptions are based on the evidence before us at the examination, including hearing statements, statements of common ground, industry research such as 'Start to Finish', our site visits, and answers given at the relevant hearing session. For example, the Partnership put forward updated expected delivery information for Sprowston (Ref GNLP0132) which led to a reduction in its contribution in the Plan period of 660 homes. For the larger strategic allocations such as the ENSRA, these assumptions are set out elsewhere in this report.
340. As set out above, nutrient neutrality emerged as a major issue during the examination following the receipt of a letter from Natural England in March 2022. It affects most of the Plan area, including the entirety of the Norwich urban area and the main towns of Wymondham and Aylsham, and initially led to a hiatus in the granting of planning permission for new housing. Significant work has been done on this, including the formation of a Joint Venture Company with other affected Norfolk Councils to create a trading platform for nutrient mitigation credits. It has also sought to retrofit existing Council-owned properties with water saving appliances, which has provided sufficient mitigation to allow for the development of Anglia Square to proceed. Many larger housing developments will also be capable of providing their own nutrient mitigation, as is proposed at several of the sites that are currently allocated in Area Action Plans. The Partnership has updated its Trajectory to reflect the impact of nutrient neutrality issues and based on the evidence before us and the answers given at the relevant hearing sessions, we consider this to be robust.
341. In terms of the assumed windfall allowance, this is based on an assessment of past windfall completions between 2008/09 and 2017/18 on sites of less than 10 dwellings in Broadland and South Norfolk, and on all such sites in Norwich. The gross annual rate of windfall completions was then heavily discounted in order

to produce the assumed windfall contribution. The size of this discount is such that it presents a very cautious view of future windfall delivery. In addition, an analysis has been undertaken of the types of sites that have come forward over the trend period, including conversions, sub-divisions, affordable housing exception sites, etc, which shows that such sites have come forward reliably. These sites are not generally picked up in the HELAA, which only considers land of 0.25 ha or above. Moreover, the recent expansion of permitted development rights to convert existing buildings to housing is likely to increase the rate at which windfalls come forward in the years ahead.

342. The assumed delivery from windfalls sites has been reduced compared to that set out in the submitted version of the Plan. This is due, firstly, to an assumption that no windfalls will be delivered in 2023/24 and 2024/25 due to nutrient neutrality issues, and secondly, to the updating of the housing supply to 31 March 2022, which means there are now fewer years remaining in the Plan period. We consider both of these adjustments to be robust. In these circumstances, we consider that compelling evidence has been presented that windfalls will provide a reliable source of supply over the Plan period.
343. Policy 7.5 has been modified so that it now relates solely to self and custom build housing. In this regard, there is a clear demand for this type of housing (discussed under Issue 6) and this policy will open up new development opportunities that were not previously available. In these circumstances, a contribution of 800 dwellings from this source is justified. Moreover, as the sites permitted under Policy 7.5 will be on land where housing has previously been restricted, any overlap with the assumed windfall contribution will be minimal.
344. In addition, we consider the 1200 dwellings assumed on sites to be identified in the SNVCHAP to be reasonable over the period of this Plan. Those sites are to be allocated separately in that document.
345. With regard to the larger sites with planning permission, and those allocated in Area Action Plans, we have made some alterations to the supply and delivery assumptions in addition to those proposed by the Partnership at the hearings. In particular, we have discounted any contribution from the Norwich RFU site (allocated in the Growth Triangle AAP - Ref GT13) as there is little evidence to indicate that it is still available or that a relocation site for the Club has been secured. This reduces the supply by 250 homes. In addition, the Partnership acknowledged that delivery at the North Rackheath site (Ref GT16) will be reduced by 180 dwellings due to a dampening effect caused by concurrent development of nearby site GNLP0172 by the same developer. However, based on the submitted evidence and discussions at the hearings, we consider that the delivery assumptions for the sites at Beeston Park, Land at Brook Farm & Laurel Farm, and Long Stratton, to be robust.

346. As a consequence of the above, the housing trajectory set out in Appendix 6 of the Plan needs to be amended for it to be justified and effective. Appendix 6 is therefore replaced by Appendix 4 in **MM20**.

Five Year Supply

347. The expected adoption date of the Plan means that the relevant 5 year period is 1 April 2023 to 31 March 2028. This is the most up to date housing supply information before the examination and therefore accords with the PPG that strategic policies should identify a five year supply from the date of adoption.

348. We have taken the updated evidence presented to us in the Partnership's March 2023 hearing statement which was based on September 2022 published housing supply data and which informed the hearing sessions. We have assessed each of the sites against the tests in the Framework and PPG in respect of whether they are deliverable or developable, based upon the evidence presented to us at the examination. We have also considered the impact of nutrient neutrality on the deliverability of sites in the period 1 April 2023 - 31 March 2028, as is set out in relation to the overall supply. We have also taken into account the progress made towards identifying mitigation solutions in considering the 5 year supply position.

349. We recognise that the evidence on which we rely to examine the 5 year supply position is data from September 2022 discussed and tested at the hearing session in March 2023. It is possible that circumstances on some sites may have altered since then. However, this is the most practical up to date evidence before us across the whole portfolio of sites to reach a conclusion on 5 year supply. To wait for further evidence would significantly delay the end of the examination and the adoption of the Plan. Other evidence could become out of date. There has to be a cut off, and a reliance made upon the most up to date evidence practically available to the examination. This is that position.

350. In most cases we agree with the Partnership's view on deliverability, but on some sites, we consider that the evidence does not support the site contributing to the 5 year supply. We have made reference to this in some of the site specific matters set out in Issue 7. For example, we do not consider that the 5 year supply contribution from the ENSRA is as great as the Partnership proposed.

351. In submitting the Plan, the Partnership has asked us to confirm the five year supply position. We have not been provided with evidence that the Partnership explicitly made it clear at the Regulation 19 stage that it was seeking to confirm the existence of a 5 year supply through the plan-making process as set out in the PPG. However, this was clearly set out in the submission letter and concerns in this regard were not raised by participants at the hearing sessions. The PPG is guidance, but in any event, it is clear that the Partnership has engaged positively with developers and others in assessing housing delivery

and this includes the many statements of common ground agreed on a significant number of allocations and commitments. Furthermore, those with an interest in housing delivery were able to submit statements and take part in the hearing sessions on housing supply at the examination, including to consider our specific questions on 5 year supply.

352. In accordance with the Framework, in this position, a buffer of 10% should be added. There is no need to add a further buffer. The 5 year housing requirement is 9,950 homes from 1 April 2023 to 31 March 2028. A 10% buffer takes this requirement to 10,945 homes.

353. Taking into account all of the evidence before us, we consider that the 5 years supply for the Plan area is 12,632 homes, which is a supply of 5.77 years. This is lower than the 6.05 years supply which the Partnership considered it would have. The summary table setting out the 5 year supply position is set out in the replacement Housing Trajectory annex which **MM20** addresses.

Supply of Gypsy and Traveller Sites

354. The need for 52 Gypsy and Traveller pitches set out in the GTAA is disaggregated as follows: 30 in years 1-5, 10 in years 6-10, and 12 in years 11-16 of the Plan. Sites that are capable of accommodating 38 pitches have been identified to meet the 5 year requirement. In this regard, Joint Delivery Statements have been agreed with the landowners for each of the proposed Gypsy and Traveller allocations that support the Partnership's delivery assumptions. Based on these, the other submitted evidence, and the discussions that took place at the hearings, we are satisfied that these sites are deliverable. The Plan will therefore be able to demonstrate a 5 year supply of Gypsy and Traveller pitches upon adoption.

355. Beyond the 5 year period, the Council-owned Ketteringham Depot is allocated as a site that will become available in the medium term. This timescale is to allow for the depot to be relocated and is supported by a Joint Delivery Statement agreed with the landowner. In our view this is a developable site. In terms of the windfall allowance that is proposed, this is supported by historic rates of windfall delivery that show a consistent pattern of unanticipated sites coming forward. The proposed criteria-based approach in Policy 5 would also allow windfall sites to continue to come forward in the future. Windfalls are only assumed to contribute to the later years of the Plan period and at a rate of 1-2 per year. This is a cautious approach, and we are satisfied that compelling evidence exists that windfalls will continue to provide a reliable source of supply.

356. Including the windfall allowance, the Plan identifies a total supply of 60 pitches to meet the requirement, which includes a modest buffer to allow for choice and

under-delivery at any of the allocated sites. This approach is positively prepared, justified, likely to be effective, and consistent with national policy.

Conclusion

357. On the basis of the evidence before us, and subject to modifications, the Plan sets out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy. The Plan, with modifications, provides both a plan period and five-year supply of housing sites.

Issue 9 – Will the Monitoring Framework provide a sound and effective basis for monitoring of the Plan?

358. The Monitoring Framework in the submitted plan is based on themes and indicators. However, to be effective it needs to set out targets, triggers, and actions. **MM19** replaces the Monitoring Framework in the submitted Plan with the revised version which we consider provides a sound and effective basis for monitoring the Plan.

Overall Conclusion and Recommendation

359. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that we recommend non-adoption of it as submitted in accordance with Section 20 (7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.

360. The Partnership has requested that we recommend MMs to make the Plan sound and capable of adoption. We conclude that the duty to cooperate has been met and that with the recommended main modifications set out in the Appendix the Greater Norwich Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

361. We conclude that if adopted promptly (with the recommended MMs) the Plan establishes a five-year supply of deliverable housing sites for the Plan area. Accordingly, we recommend that in these circumstances the LPAs will be able to confirm that a five-year housing land supply for the Plan area has been demonstrated in a recently adopted plan in accordance with paragraph 75 and footnote 40 of the Framework.

Mike Worden and Thomas Hatfield

This report is accompanied by Appendices containing the MMs.

Agenda Item 9



Cabinet
19 March 2024

NORFOLK NUTRIENT MITIGATION FUND - SCHEMES AND GOVERNANCE

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Portfolio: Leader

Wards Affected: All

Purpose of the Report:

An Expression of Interest (EOI) was submitted back in May 2023 in response to the Government's call for information on the impact of nutrient neutrality and information on projects or strategies for delivering nutrient mitigation to unlock housing delivery in catchments of Habitats Sites affected by nutrient pollution.

As a result, Broadland District Council (BDC) has received £9.6m of Capital funding and £622,610 of Revenue funding from DLUHC, on behalf of the Norfolk Local Planning Authorities (LPAs), to help address nutrient neutrality issues.

This report aims to provide details of the proposed delivery mechanism for administering the Nutrient Mitigation Fund (NMF), and associated governance model, for allocating the funding moving forwards.

Recommendations:

1. That Cabinet agree to seek Expressions of Interest for both capital and revenue funding from the NMF from interested parties to unlock nutrient neutrality mitigation, using the proposed Expressions of Interest Form detailed in Appendix A.
2. That Cabinet agree the proposed evaluation methodology against which Expressions of Interest will be considered as detailed in Appendix B1 and B2.
3. That Cabinet agree the Governance proposals for the administration of the NMF, as set out in the report and consequently agree:
 - i. To establish a Nutrient Mitigation Fund Member Working Group, with a Member from each Local Planning Authority. And approve the proposed Terms of Reference as detailed in Appendix C1.

- ii. To establish a Nutrient Mitigation Fund Officer Working Group, with an officer from each Local Planning Authority. And approve the proposed Terms of Reference as detailed in Appendix C2.
 - iii. To delegate authority for the final decision on the allocation of funding to the s151 Officer, in consultation with the Assistant Director Planning (as LPA lead) and the Leader, taking due regard of the recommendations given by the Nutrient Mitigation Fund Member Working Group.
4. That Cabinet agree to delegate authority to make changes to the Expressions of Interest Form, the Evaluation Methodology, and the Working Groups Terms of Reference to the s151 Officer, in consultation with the Assistant Director Planning (as LPA lead) and the Leader, taking due regard of the recommendations given by the Nutrient Mitigation Fund Officer Working Group.
 5. That Cabinet agree to the recruitment of a Nutrient Mitigation Fund Manager, and supporting administrative and technical support, in order to manage the Scheme, to be funded from the DLUHC revenue funding.
 6. That Cabinet recommends to Full Council to add £9.6m to the BDC Capital Programme.

1 Background

- 1.1 BDC submitted an Expression of Interest (EOI) on behalf of all the Norfolk Local Planning Authorities (NLPAs) affected by nutrient neutrality to the Department for Levelling Up, Housing and Communities (DLUHC) following its invitation to submit costed expressions of interest for programmes or strategies for delivering nutrient mitigation, to unlock housing delivery in catchments of Habitats Sites affected by nutrient pollution.
- 1.2 As a result of this submission, on 19 December 2023, DLUHC awarded BDC £9.6m of Capital funding on behalf of the Broads and Wensum catchments. BDC is the accountable body which will administer the funding provided – acting as the lead for the group of LPAs affected by nutrient pollution in the two catchments.
- 1.3 There is now a requirement to consider the process and respective governance model to administer the fund. The key outcome of an effective scheme and governance model is to ensure we balance the need for collective buy in from all LPAs into the funding allocations and mitigation delivery, with the requirement to commit the funds in line with DLUHC's expectations over the coming 12 months.
- 1.4 BDC Cabinet agreed at a meeting on the 16 January 2024 to accept the capital funding on behalf of the Norfolk LPAs and commit this to a programme of nutrient mitigation work. At this meeting it was also agreed to use up to £1.5m of the capital funding to make a loan to Norfolk Environmental Credits Ltd (NEC) to fund a specific nutrient mitigation intervention.
- 1.5 In late January DLUHC also made £422,610 revenue available to support the delivery of the capital programme. A further £200,000 revenue (£100,000 per catchment) has also been made available through the Nutrient Support Fund.
- 1.6 The full revenue and capital payments from the Department for Levelling Up, Housing and Communities were received by BDC on the 23 February 24.

- 1.7 Five LPAs are covered by this arrangement (Broadland District Council, Breckland Council, North Norfolk District Council, Norwich City Council and South Norfolk Council). The other authorities in the catchments have confirmed that nutrient neutrality and the impact on new homes is only minimal or not relevant and therefore, they will not be directly involved.
- 1.8 The Broads Authority has asked to be included in any circulation of papers and made aware if any nutrient mitigation solutions are proposed in their planning area.
- 1.9 The nutrient mitigation solutions that the local authorities are progressing or enabling will sit alongside and not compete with those that Natural England are working on within the catchment.

2 General Approach

- 2.1 DLUHC has set the following key funding outcomes for the capital grant money:
- i) Deliver nutrient mitigation interventions in the catchment within 2023/24 and 2024/25, and
 - ii) Unblock nutrient mitigation capacity available for developers.
- 2.2 To maximise our ability to deliver schemes within the expected timeframe, it is recommended that we use the money to encourage any suitable projects to come forward.
- 2.3 This therefore requires the Councils to put in place a process to:
- (i) Seek interest from any interested parties via an Expression of Interest process.
 - (ii) Evaluate any expressions of interest.
 - (iii) Award funds to appropriate projects.
- 2.4 It is also acknowledged that not many projects are currently ready to progress to implementation. It is therefore recommended that £200,000 is used to grant fund feasibility work on developing projects.
- 2.5 Consequently, we are looking to develop two schemes:
1. Nutrient Mitigation Feasibility Scheme (for feasibility work).
 2. Nutrient Mitigation Capital Scheme (to deliver mitigation projects).
- 2.6 A flowchart showing how an applicant might progress from an initial enquiry for either Feasibility or Capital funding or both can be seen in Appendix D.
- 2.7 Once launched it will be necessary to publicise the availability of funding in order to encourage Expression of Interest to come forward. A webpage will be developed to provide information and capture requests.
- 2.8 Where a revenue claim is being made for feasibility work, third-party quotes and specifications of work will be required prior to any payments being made.
- 2.9 To help guide the administration of the Norfolk Nutrient Mitigation Fund, and ensure that this is carried out in an equitable, and collaborative way, an Inter Authority Memorandum of Understanding (MoU) will be drafted and agreed by the Nutrient Mitigation Fund Member Working Group.

3 Proposed Schemes

- 3.1 It is necessary to work out the best way to utilise the grant funding from Government to the catchment authorities to deliver the required outcomes.

Expression of Interest Process

- 3.2 In order to seek interest from any interested parties to deliver nutrient mitigation interventions, an Expression of Interest form has been devised and is included as Appendix A. This form seeks to balance the need to obtain a standard set of information to evaluate the Expression of Interest, with flexibility to respond to different potential solutions. The EOI form will allow submissions for either feasibility / revenue or capital funding but the assessment criteria will be different (see below).
- 3.3 It is proposed that the Expression of Interest process would be launched by the end of March 2024 and interested parties would then be able to submit EOIs at any time. This would help ensure projects could be evaluated and delivered as quickly as possible.

Evaluation Process

- 3.4 Any EOI will need to be evaluated to ensure they are robust and meet the needs of the area. EOIs will need to be evaluated quickly and it is suggested that we should aim for the evaluation process to take place at least monthly.
- 3.5 The EOIs could be very diverse and vary significantly in cost and scope. We also need to ensure that local nutrient mitigation projects can help meet each area's needs.
- 3.6 The following evaluation criteria are therefore recommended:

Essential Criteria

- Is the project in the catchment area? (Pass / Fail)
- Is there satisfactory scientific evidence that the project will deliver appropriate mitigation?
- Have proposals been shared with and feedback received from the statutory agencies Environment Agency / Natural England / the Local Planning Authority?
- Is there satisfactory evidence that the project is deliverable within the timeframe proposed?
- Is there satisfactory evidence that the project is a financially robust?
- Is there a mechanism in place to repay the funds?
- Satisfactory financial & legal checks.

Policy Objective Criteria

- Delivering nutrient mitigation interventions in the catchment, ideally by March 2025.
 - Unblocking (nutrient mitigation capacity available for developers) homes.
 - Value for Money of the Project.
 - Financial Return on Investment.
- 3.7 Further details are set out in Appendix B.

Feasibility Funding

- 3.8 The feasibility work funding is one-off and will be treated as grant funding that will not need to be repaid.
The provision of this fund is a local initiative to try and speed up delivery and was not stipulated by the Government.
Applicants will be able to apply for feasibility funding or capital funding or both.

Capital Funding

- 3.9 The DLUHC Memorandum of Understanding relating to this Government Capital grant funding states:

Cost recovery:

Nutrient mitigation credits should be sold at a price which reflects **the full cost** of efficiently establishing, maintaining and monitoring mitigation – including reasonable administrative costs.

The LPA should **not offer public subsidy to developments and any return generated from the sale of credits should be reinvested in the programmes.**

- 3.10 In essence, the Government grant money can be used to fund mitigation projects up front (to ensure they are not held up by lack of funds and can thus progress quickly) but that the income ultimately generated from the mitigation projects should be sufficient to pay back the initial investment. This therefore means that the Norfolk Nutrient Mitigation Capital Scheme needs to operate on an investment basis (not a non-repayable grant basis).
- 3.11 The most straight forward way to do this is to treat the money as an investment in a project. The return on the investment would need to be negotiated on a project by project basis, but could require the investment to be repaid plus interest, or as a share of the project profits.
- 3.12 Initially there is a requirement by the Government to have committed all the £9.6m capital funding by March 2025 and therefore in the early stages it is likely that the range of investment arrangements will be limited. In time it is likely that further funding models could be explored for the capital investment, potentially including shared risk and reward models or linked to profit on sales.

Support to Potential Applicants

- 3.13 Developing suitable mitigation projects is challenging. Therefore, as part of the arrangements it is proposed that feasibility / revenue support is available to potential applicants as well as capital funding. This is not prescribed as part of the Government funding but felt by the Norfolk LPAs to be an important part of encouraging viable projects to come forward as soon as possible.

Credit Brokering Service

- 3.14 Some potential applicants may have a suitable site / scheme for delivering Nutrient Mitigation, however they may not wish to run a nutrient neutrality credit trading scheme themselves.

- 3.15 In order to support these potential projects, it would be an option for the Councils to offer a nutrient neutrality credit brokering service. However, this is not the core business of the Councils and is not envisaged at this stage.
- 3.16 It is therefore recommended that if a potential applicant wanted assistance with delivering a credit brokering service, we would direct them to any credit brokering scheme offered by other parties.

4 Governance

- 4.1 There needs to be a process whereby the affected Norfolk LPAs can collaboratively input into delivery of the Nutrient Mitigation Fund and the allocation of funding.
- 4.2 A key element to designing this governance model is ensuring that we balance the need for speed of delivery with collective buy-in and agreement at the right level.
- 4.3 Given the strategic importance of this issue, there will need to be active member oversight, and thus it is recommended that both an informal member and an informal officer working group are established as detailed below.
- 4.4 This Governance process will initially be centred on the allocation of the Local Nutrient Mitigation Fund for Norfolk. However, once mitigation is no longer required, any resulting / residual funding must be invested in measures to aid Habitat Site restoration and objectives of sustainable development and promoting public access to nature. In the future, this Governance Structure could be used to develop and implement projects in relation to this requirement.

Nutrient Mitigation Fund Member Working Group

- 4.5 It is proposed that a new informal Member Working Group is established, made up of the five LPAs who submitted the expression of interest to DLUHC, co-ordinated by BDC as the accountable body for the funding. This group will not have any formal decision-making powers.
- 4.6 Membership of this group will be determined by each LPA, taking into consideration potential conflict of interests.
- 4.7 This Group would have the following key responsibilities
- Receipt of recommendations from the officer working group and
 - Making recommendations on the allocation of funding, to BDC as the Accountable body.
- 4.8 The Terms of Reference for this group can be found in Appendix C1.

4.9 The proposed Member working group membership is as follows.

Breckland	Councillor Mark Kiddle-Morris (Executive Support Member for Planning Policy)
Broadland	Councillor Sue Holland (Leader and lead for Strategic Planning Policy)
Norwich	Councillor Matthew Fulton-McAlister (Planning and Regulatory Services Portfolio Holder)
North Norfolk	Councillor Andrew Brown (Planning and Enforcement Portfolio Holder)
South Norfolk	Councillor Lisa Overton-Neal (Planning Portfolio Holder)

Nutrient Mitigation Fund Officer Working Group

4.10 It is proposed that a new officer working group is established, made up of the five LPAs who submitted the expression of interest to DLUHC, co-ordinated by Broadland District Council as the accountable body for the funding, and with the Broads Authority joining on an ad-hoc basis.

4.11 Membership of this group will be determined by each LPA, taking into consideration potential conflict of interests.

4.12 This Group would have the following key responsibilities

- Assessment of proposed projects.
- Forming recommendations and preparing and presenting reports for the allocation of funding to the Member Working Group, with clear rationale against the criteria for assessment.
- Development of and oversight of the delivery of the Nutrient Mitigation Fund and mitigation delivery schemes; including the requirements set out in the MOU of monitoring and evaluating mitigation delivered and homes unblocked.
- Overseeing of risks and issues with development and delivery of the schemes.

4.13 The group will need to be provided with support (such as legal, procurement and scientific specialisms) as and when required. The Terms of Reference for this group can be found in Appendix C2.

4.14 The proposed Officer working group membership is as follows.

Lead Accountable Officer	Rodney Fincham (section 151 officer BDC)
Breckland	Andrew Holdsworth (Assistant Director – Economy)
Broadland	Ben Burgess (Assistant Director - Planning) from 18 March
Norwich	Sarah Ashurst (Head of Planning and Regulatory Services)
North Norfolk	Russell Williams (Assistant Director – Planning)
South Norfolk	Tracy Lincoln (Development Manager)

Role of Broadland District Council (BDC) as the Accountable Body

- 4.15 As accountable body for the Local Nutrient Mitigation Fund for Norfolk, BDC is the body that has to legally enact the final allocation of any funding.
- 4.16 However, in the spirit of collaboration, it is proposed that the Nutrient Mitigation Fund Member Working Group will consider and make recommendations to BDC as the accountable body, and BDC will act on these recommendations.
The Leader at BDC will be the BDC representative on the Member Working Group, so there is a direct link through to final decision making.
- 4.17 In order for BDC to be able to expedite delivery of projects recommended by the Nutrient Mitigation Fund Member Working Group, it is recommended that delegation is given on the final decision on the allocation of funding to the s151 Officer and Assistant Director Planning, in consultation with the Leader, taking due regard to the recommendations from the Member Working Group.

5 Other Options

Scheme Options

- 5.1 In terms of options for managing the Fund and schemes, there are other options that could be considered.
These are set out below in the table and include an overview of the reasons they are not recommended.

Option	Why it is not recommended
BDC directly commissions and manages projects funded by this Government grant.	<p>It is not in the spirit of collaboration.</p> <p>BDC does not currently have the expertise to carry this out.</p> <p>Unlikely to deliver sufficient projects.</p>
<p>We select a single delivery partner. Note: This would be likely to be considered a subsidy but is likely to be a permitted subsidy as it would be likely to meet the Principles of the Subsidy Control Act 2022 and so can be given.</p>	<p>Unlikely to deliver sufficient projects.</p> <p>Would stifle competition and not help to develop a nutrient mitigation market in Norfolk.</p> <p>Increasing the risk of failure by just using one provider.</p> <p>Limiting the range of ideas that might come forward to the capacity of that single provider.</p>

Governance Options

- 5.2 In terms of governance, there are other options that could be considered. These are set out below in the table and include an overview of the reasons they are not recommended.

Option	Why it is not recommended
Instead of establishing separate Member and Officer groups, there is the option to form a single joint Member and Officer working group.	It is envisaged that there will be significant operational work which will need to be done to assess the bids which come through. A separate Officer working group which reports into a Member working group would enable operational discussions to remain with Officers and for Members to retain strategic and political oversight of the process.
Instead of establishing a new member working group the Norfolk Strategic Planning Member Forum could be used as the Member group to consider allocation of funding.	This work does not fall within the current remit of the Forum. The current membership of the Forum may pose challenges with potential conflict of interests with potential bidders. Fitting with a programme of published Forum meetings would also potentially slow down the allocation of funding.
Instead of establishing a Member working Group, there is the option for each LPA to take a report on the proposed allocation of funding for projects to their respective Cabinet meetings.	The decision-making process would be very slow and would have to fit with the established meeting schedules. This could potentially lead to opportunities being missed and put further pressure on meeting the March 2025 deadline. It is not required by the MOU with DLUHC, as BDC is the accountable body for the funding, therefore, is the only LPA who can formally make the decision on the spend.

6 Funding Agreement

- 6.1 When Expressions of Interest are approved, it will be necessary to award the funding using a grant agreement (for feasibility works) and a loan agreement (for capital works). In the case of the latter two templates will be produced, the first covering simple interest repayment models, the second more sophisticated arrangements such as profit sharing.

7 Next Steps

7.1 If agreed, the next steps for implementation would be:

ASAP	Recruitment of the Nutrient Mitigation Fund Manager (using some of the DLUHC revenue funding).
End of April 2024 From May 2024	Funding Schemes finalised and formally launched in May Receipt of Expressions of Interest, review of submissions, and where appropriate the award of funding.
By March 2025 From March 2025	Awarding all the original £9.6m capital funding. Recycle the capital funds until nutrient neutrality is resolved.

8 Issues and Risks

- 8.1 **Resource Implications** – There is still a significant amount of work to be put in to get the schemes operational and all the local planning authorities will need to play a full role in promoting the scheme and looking for potential solutions. This will particularly be the case in areas at the top of the Wensum or in the smaller catchment areas
Mitigation: some additional capacity has been brought in to assist with the design of the schemes and establishing the working arrangements and material will be developed for use to promote the scheme. All the authorities will need to be proactive in promoting this funding opportunity through their formal and informal networks.
- 8.2 BDC will require a team to administer the scheme. This will need to be supplemented by external resources to assess and review the submissions that are made. Finding the right skills and experience for the Nutrient Mitigation Fund Manager role will be challenging.
Mitigation: A draft job description has been prepared and there is an opportunity for a full-time secondment from one of the local authorities – which may mean an appointment can be made more quickly, subject to meeting the selection criteria.
- 8.3 **Legal Implications**
- 8.4 Any funding to third parties will need to take account of the Subsidy Control Act, and each award will need to be assessed in terms of the subsidy requirements that need to be met.
- 8.5 A subsidy is permitted if the four limbs and eight principles of the legislation are met. If funding is provided at commercial terms, then a subsidy would not apply.
- 8.6 **Equality Implications** – An Equalities Impact Assessment may need to be carried out for each individual scheme.

- 8.7 **Environmental Impact** – Nutrient pollution is in essence, the increase in levels of nutrients such as nitrogen and phosphorous. Nutrient pollution is a particular problem for freshwater habitats and estuaries as increased levels of nutrients can impact any wildlife that live there. This fund and subsequent projects will begin to address some of the key issues Nutrient pollution is having in Norfolk, and will support BDC’s key Council priorities they have committed to in the Council Plan for 2024-2028 (as set out below):
- **Cleaner, greener Broadland.** Objective: To think globally and act locally with low-carbon solutions and safeguards for the natural environment through working collaboratively and innovatively to respond appropriately and effectively to the climate and biodiversity crisis.
 - **Providing the right homes in the right places.** Objective: Create a district where all residents have access to safe, and affordable, energy efficient housing, leading to thriving, inclusive communities that promote overall wellbeing.
- 8.8 Funding these projects will have a significant impact on the environment as it is likely that funded solutions will start to improve the environment in the special areas of conservation whilst supporting the much-needed housing growth across both the district and Norfolk.
- 8.9 **Crime and Disorder** – The Council will need to undertake further financial and legal checks on any individuals or companies that are applying for funding including any criminal, insolvency, county court judgments etc which would influence any final funding decisions.
- 8.10 **Risks** – Significant work has been undertaken since the Government announcement on the 19 December 2023. It is anticipated that most applications for funding will need further clarification and work prior to any initial funding decision. Therefore, there is a risk that all the funding will not be committed by the end of 2024/25. This has been mitigated through the pace of work in the past few months, and it will also be heavily influenced by the attractiveness of the offer and the quality of the bids submitted.
- 8.11 As we progress through to delivery of the Fund, a risk and issues register will be maintained to ensure key matters are captured and addressed.

9 Recommendations

1. That Cabinet agree to seek Expressions of Interest for both the capital and revenue funding from the NMF from interested parties to unlock nutrient neutrality mitigation projects, using the proposed Expressions of Interest Form detailed in Appendix A.
2. That Cabinet agree the proposed evaluation methodology against which Expressions of Interest will be considered as detailed in Appendix B1 and B2.
3. That Cabinet agree the Governance proposals for the administration of the NMF, as set out in the report and consequently agree:
 - i. To establish a Nutrient Mitigation Fund Member Working Group, with a Member from each Local Planning Authority. And approve the proposed Terms of Reference as detailed in Appendix C1.
 - ii. To establish a Nutrient Mitigation Fund Officer Working Group, with an officer from each Local Planning Authority. And approve the proposed Terms of Reference as detailed in Appendix C2.

- iii. To delegate authority for the final decision on the allocation of funding to the s151 Officer, in consultation with the Assistant Director Planning (as LPA lead) and the Leader, taking due regard of the recommendations given by the Nutrient Mitigation Fund Member Working Group.
4. That Cabinet agree to delegate authority to make changes to the Expressions of Interest Form, the Evaluation Methodology, and the Working Groups Terms of Reference to the s151 Officer, in consultation with the Assistant Director Planning (as LPA lead) and the Leader, taking due regard of the recommendations given by the Nutrient Mitigation Fund Officer Working Group.
5. That Cabinet agree to the recruitment of a Nutrient Mitigation Fund Manager, and supporting administrative and technical support, in order to manage the Scheme, to be funded from the DLUHC revenue funding.
6. That Cabinet recommends to Full Council to add £9.6m to the BDC Capital Programme.

Appendix A: Expressions of Interest Form and Information to Applicants

Nutrient Mitigation in Norfolk

Funding is available to bring forward nutrient mitigation for the phosphorus and nitrogen levels affecting the Special Areas of Conservation across Norfolk.

The desired outcome is to release planning applications held up due to the additional nutrient loads that are generated by development (and therefore enable housing currently on hold and a pipeline of future developments to proceed).

The funding is twofold.

- A **Nutrient Mitigation Feasibility Scheme** to enable potential solutions to come forward more quickly by providing revenue funding up front for feasibility work.
- **Nutrient Mitigation Capital Scheme** that will be provided to progress nutrient mitigation projects.

A project will have to be within the Wensum, Yare, Bure, Ant, Thurne and Trinity Broads and an area where there is planned housing growth (planning applications) that are on hold.

In the Wensum in particular any potential mitigation solution will need to be upstream of development or connect to a wastewater treatment works that is upstream to release a particular development site.

Nutrient Mitigation Feasibility Scheme

Non repayable grants are available to enable projects to progress in a timely manner, for example through funding scientific evidence gathering or modelling, legal or financial support to enable a project to move towards implementation.

There is no cap on the funding that is available per project, but only £200,000 is currently available in total, and we wish to fund a number of feasibility projects.

Nutrient Mitigation Capital Scheme

Available funding of up to £9.6m.

Repayable loans will be made to successful bidders, enabling the funding to be recycled until nutrient neutrality is no longer an issue.

The funding is to bring forward nutrient mitigation solutions that will release homes for development in a timely manner. It is anticipated this would be through reducing levels of phosphorus and nitrogen on both a permanent and temporary basis.

Investment would be repaid through the income received from the provision of nutrient credits to developers.

Any project that is funded will need to demonstrate that there is a direct link between the mitigation provided and releasing housing in the catchment area.

Launch Date

The Schemes will launch in early May 2024.

Expressions of interest can be submitted at any time after this date. We aim to review these within 28 days of receipt.

Expressions of will continue to be assessed until there is no funding available.

Further Information

Some initial work has been undertaken by Royal Haskoning on the catchments, nutrient requirements and potential solutions and this can be accessed through the following link
Link to be added once website created.

Whilst we would not wish to constrain any applications, particular projects that could come forward include:

- Nature based solutions
 - Riparian buffers
 - Integrated constructed wetlands
 - Cover cropping.
- Run off management solutions
 - Conversion of agricultural land to other uses
 - Riparian buffers.
- Wastewater management solutions
 - Upgrading smaller wastewater treatment plants (not captured under TAL or other legislative requirements)
 - Portable treatment works
 - Septic tank upgrades to package treatment plants
 - Connection of septic tanks and package treatment plants to the mains.
- Demand management solutions
 - Retrofitting of groups of properties to slow water flow and reduce water consumption.

The Royal Haskoning report highlights that these are the sort of schemes where there is more scientific evidence of their impact and therefore greater likelihood they would be acceptable to statutory agencies such as Natural England, local planning authorities and the Environment Agency.

How to Apply for Funding

An Expression of Interest data capture form has been developed and this is detailed below. This will be used to gather core information on your organisation and the proposed project.

However, don't worry if you haven't worked through all this detail yet, please provide what information you can. We can then work with you to advise you on what is required and where you could go to get some further assistance.

The Expression of Interest will then be assessed against the following criteria.

Key Criteria

- Is the project in the catchment area? (Pass / Fail)
- Is there satisfactory scientific evidence that the project will deliver appropriate mitigation?
- Have proposals been shared and endorsed by statutory agencies Environment Agency / Natural England / the local planning authority?
- Is there satisfactory evidence that the project is deliverable within the timeframe proposed?
- Is there satisfactory evidence that the project is a financially robust?
- Is there a mechanism in place to repay the funds?
- Meeting financial & legal checks

Policy Objective Criteria

Secondly the application will be assessed against the policy objectives that have been set as part of the funding from Government and the nutrient mitigation details provided.

1. Deliver nutrient mitigation interventions in the catchment by March 2025 (MoU Para 3.2).
2. Unblock (nutrient mitigation capacity available for developers) homes (MoU Para 3.2).
plus
3. Value for Money of the Project.
4. Financial Return on Investment.

Further Help

Please provide the information that you can at this stage and contact us with any updates on your project.

You may wish to access the Nutrient Mitigation Feasibility Fund which will provide funding to help bring proposals forward to a state where business cases are complete or improved and investment decisions can be taken in the future.

A dedicated website will be set up to provide further details (*website link to be added once website created*), in the meantime you can email us at NMFund@southnorfolkandbroadland.gov.uk and the Team will assist you with any enquiries.

EXPRESSION OF INTEREST FOR NUTRIENT MITIGATION FUNDING

Please complete this form as fully as possible as any initial investment assessment will be based on the information provided and attached to your application.

There are two funding streams available

- The Nutrient Mitigation Feasibility Scheme to provide revenue funding to undertake further feasibility work.
- The Nutrient Mitigation Capital Scheme to pay for capital expenditure to implement projects to deliver mitigation.

You can apply for either feasibility (revenue funding) or Capital funding or both.

- The feasibility work funding is one-off, and will be treated as grant funding that will not need to be repaid.
- The Capital funding will be a loan agreement and will need to be repaid.

We recognise that you may not be able to complete all the sections at this stage, especially if you are bidding for feasibility work. However, it is important for us to have as much information as possible, which you can add to as and when more details are available.

There is a requirement for both temporary and permanent mitigation.

Permanent mitigation will be required in perpetuity (80 -125 years).

Temporary mitigation will be required because a significant number of wastewater treatment works within Norfolk will be upgraded by April 2030 to clean wastewater to meet the highest Technically Achievable Limit (TAL), thus reducing the need for mitigation in the longer term. Therefore, any temporary mitigation is also important and should be provided for at least six years.

The questions in bold will be the main criteria used to carry out an initial sift of the applications that are received and will be key considerations for the capital funding.

If you have any questions please contact us by email NMFund@southnorfolkandbroadland.gov.uk

PROVIDER DETAILS	
1. Applicant name	
2. Applicant details - Address - Companies house registration number (if applicable)	
3. Contact details - Lead person - Telephone - email	
4. Land Owner(s) (if land based proposal) Who is the land owner (if different to the applicant)? And has their permission been sought to put in this proposal? Are any consents required to be able to progress with this proposal?	

REQUEST FOR FUNDING	
5. How much Feasibility (revenue) funding are you requesting?	£
6. How much capital funding are you requesting?	£
MITIGATION OFFER	
7. Summary of Nutrient Mitigation proposal e.g. wetland/land use change/water treatment (please append any further details as necessary) in a separate document giving as much detail as possible).	
8. Is the mitigation permanent (secured for 80 years plus) or temporary (secured for less than 80 years)?	Permanent / Temporary
9. If 'Temporary' please state how many years the mitigation will be in place.	
10. Has this mitigation been legally secured yet?	Conservation covenant S106 agreement Other – please state
11. Catchment impacted	Yare Bure sub catchment Wensum Ant Thurne sub catchment Trinity sub catchment
12. If in the Wensum please state the location where mitigation will impact on the river	
13. When do you anticipate the mitigation being in place?	
14. When do you anticipate the mitigation being fully operational?	
15. Nutrient yield anticipated per year?	Kg TP phosphorus Kg TN nitrogen
16. Has the anticipated yield been independently and scientifically verified yet?	Yes/No
17. If 'Yes' please state who has completed the work (and attach any report that has been produced)	
18. Has the scientific evidence been signed off or consulted upon with any other statutory bodies yet?	Natural England Environment Agency Local authority Other
19. Is the site in a nitrate vulnerability zone (NVZ)	
20. If 'Yes' re the NVZ has this been factored into your calculations	

21. How many homes are anticipated to get planning permission due to this mitigation (if known)?	
MITIGATION USE/CUSTOMERS	
22. Do you have specific customer(s) for the mitigation?	Yes/No
23. Do you plan to sell the mitigation yourself?	Yes/No
24. If 'Yes' which developer or nutrient credit provider is your customer	
25. If 'No' how do you plan to repay the funding and enable homes to be permitted?	
FEASIBILITY FUNDING	
26. What do you need the feasibility funding for? e.g. further research, scientific studies, data gathering, legal advice etc.	
CAPITAL FUNDING	
27. Total cost of your project	£
28. Date that funding is required?	XX/XX/XXXX
29. How do you propose to repay the Capital funding?	Through a monetary repayment Through profits on sales Through risk and reward scheme Through equity investment in your company and a profit share Other (please specify)
30. What (if any) security could you providing over the repayment of the funding?	
31. Are there other sources of funding on which the project is dependent or match funding you are relying on?	Yes/No
32. If 'Yes' what is the source of that funding and the amount?	
FURTHER DETAILS	
Please provide further details that you wish to make us aware of.	

Appendix B1: How we will assess Expressions of Interest for Feasibility Funding (revenue)

Essential Criteria
Is the project in the catchment area (Pass / Fail) ?
Is it likely that satisfactory scientific evidence can be obtained that the scheme will deliver appropriate mitigation?
Is it likely that proposals will be shared with and endorsed by statutory agencies Environment Agency / Natural England / the Local Planning Authority?
Is it likely that there will be satisfactory evidence that the scheme is deliverable within the timeframe proposed?
Is it likely that there will be satisfactory evidence that the scheme is financially robust?
Is it likely that there will be a mechanism in place to repay the funds?
Is it likely that satisfactory financial & legal checks can be obtained?
Policy Criteria
<p>Policy Objective 1: Is it likely that this project will Deliver nutrient mitigation interventions in the catchment ideally by March 25 (MoU Para 3.2). Under this criteria we are looking for schemes that can be delivered quickly, and / or are in areas that currently have limited access to credits.</p>
<p>Policy Objective 2: Is it likely that this project will Unblock (nutrient mitigation capacity available for developers) homes (MoU Para 3.2). Under this criteria we are looking to maximise the number of homes being unlocked. This will include whether the credits are meeting the need for temporary or permanent credits.</p>
<p>Policy Objective 3: Is it likely that this project will deliver Value for Money Under this criteria we are keen to support schemes that will provide a value for money solution to a range of developers. Therefore we wish to understand both the likely cost of the credits (per KG of Nitrates and per KG of Phosphorous) and the proposed mechanism for selling / allocating the credits.</p>
<p>Policy Objective 4: Is it likely that this project will deliver a Financial Return on Investment Under this criteria we are looking at how secure the investment is and what return will be generated.</p>

Appendix B2: How we will assess Expressions of Interest for Capital Funding

Essential Criteria
Is the project in the catchment area (Pass / Fail) ?
Is there satisfactory scientific evidence that the scheme will deliver appropriate mitigation?
Have proposals been shared with and endorsed by statutory agencies Environment Agency / Natural England / the Local Planning Authority?
Is there satisfactory evidence that the scheme is deliverable within the timeframe proposed?
Is there satisfactory evidence that the scheme is financially robust?
Is there a mechanism in place to repay the funds?
Satisfactory financial & legal checks?

	Indicators for a low score	Indicators for a high score
Policy Objective 1: Deliver nutrient mitigation interventions in the catchment ideally by March 25 (MoU Para 3.2). Under this criteria we are looking for schemes that can be delivered quickly, and / or are in areas that currently have limited access to credits.		
To assess this we will look at: - The speed of delivery. With delivery under 6 months being an indicator of a high score, and delivery that will take over 3 years being an indicator of a low score. However, speed of delivery will be affected by the nature of the proposal so this will be taken into account. - Where the mitigation is being delivered. With a higher score being awarded to schemes that will deliver credits in areas that currently have limited access to credits, and / or are in areas where there is significant unmet demand.	A scheme that will take a long while to deliver, and / or is in an area that already has an active market in NN credits.	A scheme that has the ability to deliver an intervention quickly and / or is in an area that currently has limited access to NN credits
Policy Objective 2: Unblock (nutrient mitigation capacity available for developers) homes (MoU Para 3.2). Under this criteria were a looking to maximise the number of homes being unlocked. This will include whether the credits are meeting the need for temporary or permanent credits.		
To assess this we will look at: - The number of homes to be unlocked per £100,000 investment. With a low cost in an allocated development site being an indicator of a high score, and a high cost or being in a speculative development area being an indicator of a low score. However, cost will be affected by the location and nature of the proposal so this will be taken into account. - Whether the proposal will deliver temporary or permanent credits. In general permanent credits are preferred, unless the temporary credit are specifically needed in an area.	A scheme that requires a large investment but will only unlock a small number of homes.	A scheme that will unlock a significant number of homes in an allocated development site(s), and the investment per home unlocked is low.

Policy Objective 3: Value for Money of Project

Under this criteria we are keen to support schemes that will provide a value for money solution to a range of developers.

Therefore we wish to understand both the likely cost of the credits (per KG of Nitrates and per KG of Phosphorous) and the proposed mechanism for selling / allocating the credits.

To assess this we will look at:

- The likely cost per kg of Phosphorus / Nitrogen to developers, and how the cost will be set. With a low price being an indicator of a high score, and a high price being an indicator of a low score. However, price will be affected by the location and nature of the proposal so this will be taken into account.
 - How the credits will be sold / distributed. With an open market sale process and / or at least some allocation for small developers being an indicator of a high score, and the credits being offered to a single or only a few developers being an indicator of a low score.
- We are also interested in whether the project will deliver any wider benefits (e.g. other environmental or social benefits).

A scheme that will deliver high cost credits, and / or help only a limited number of developers.

A scheme that provides the whole market with credits at a cost that is value for money.

Policy Objective 4: Financial Return on Investment

Under this criteria we are looking at how secure the investment is and what return will be generated.

To assess this we will look at a combination of:

- The likely financial return to us.
- The timeframe for the return.
- The structure of the investment (ie loan, share of profits etc).
- The risk involved in the investment.

A guaranteed high return (eg a loan at a commercial rate / or at least the equivalent PWLB rate) is likely to be rated higher than a share of the profits as and when credits have been sold. However, we do not want to deter innovative schemes and will take this into account as part of the assessment.

High risk investment and / or no proposed return on investment.

Investment with a high level of security, a good return, and which will be repaid quickly.

Appendix C1: Nutrient Mitigation Fund Member Working Group Terms of Reference

Purpose

The Nutrient Mitigation Fund Member Working Group will exercise political input into the allocation of the Local Nutrient Mitigation Fund for Norfolk.

Membership

The group is made up of five members. One from each of the Local Planning Authorities of Breckland District Council, Broadland District Council, North Norfolk District Council, Norwich City Council and South Norfolk Council.

In appointing Members to this Group, each Local Planning Authority will take into account potential conflicts of interest.

Prejudicial interest - If a Member is directly involved with an organisation that is bidding for funding, then that Member will not be able to vote on whether or not to invest in the project being proposed by that organisation.

Key Responsibilities

- To receive and assess recommendations from the Officer Working Group for the allocation of the Local Nutrient Mitigation Fund for Norfolk.
- To endorse or reject recommendations on allocation of funding to Broadland District Council as the accountable body.
- To oversee the work of the Mitigation Delivery Scheme and receiving updates and progress reports, including expenditure, nutrient mitigation generated, and homes unlocked.
- Once Nutrient mitigation is no longer required, oversee the development of proposals for how the residual funding will be invested, in line with the MoU signed with Government by Broadland District Council as the accountable body.

The parties will work together in good faith and in an open, co-operative and collaborative manner. The Member Working Group and Officer Working Group will work together in the spirit of mutual trust in order to successfully implement the Nutrient Mitigation Fund for Norfolk.

Chairman

The Chairman will be the Broadland District Council representative (as BDC is the accountable body). Should the Chairman not be in attendance at a meeting of the Group, a substitute Chairman, for that meeting, shall be appointed by those members present.

Quorum

A minimum of three of the constitute authorities must be represented at a meeting for any business to be conducted. Substitute members will be permitted, provided they have a good knowledge of the subject matter and have been briefed.

Voting

The group will work on a consensual unanimous basis.
It is therefore not expected that formal voting will be required.

Meeting frequency

The Group will meet as required, but this will be varied to reflect the needs and requirements of the Schemes which are developed and to ensure opportunities are expedited.
Meetings will generally be held in person.

Terms of Reference

The Terms of Reference may only be amended with the agreement of the Group.

Press and Public

Meetings will be held without the press and public present.

Resources

The Group will be supported by BDC as the accountably body for the funds.
The Secretariat will keep notes and actions from the meeting.

Appendix C2: Nutrient Mitigation Fund Officer Working Group Terms of Reference

Purpose

The Nutrient Mitigation Fund Officer Working Group will provide advice and guidance to the Nutrient Mitigation Fund Member Working Group, in relation to the allocation of the Local Nutrient Mitigation Fund for Norfolk.

Membership

The group is made up of officers from each of the Local Planning Authorities of Breckland District Council, Broadland District Council, North Norfolk District Council, Norwich City Council and South Norfolk Council.

In appointing officers to this Group, each Local Planning Authority will take into account potential conflicts of interest.

Specialist advice from other internal/external agencies will be sought as and when needed. Broadland District Council, as accountable body, will be responsible for commissioning this advice.

Observers (e.g. a representative from the Broads Authority and a representative of the Norfolk Strategic Planning Group) will be able to attend and take part in discussions at the discretion of the Chair but will not be able to vote on the proposed projects. The Broads Authority would be informed in advance if a mitigation solution was put forward within their planning area.

Prejudicial interest - If an officer is directly involved with an organisation that is bidding for funding, then that officer will not be able to vote on whether or not to invest in the project being proposed by that organisation.

Key Responsibilities

- Assessment of proposed projects.
- Forming recommendations and preparing and presenting reports for the allocation of funding to the Member Working Group, with clear rationale against the criteria for assessment.
- Development and overseeing of delivery of the Mitigation Support Scheme and Mitigation Delivery Scheme funding provided by the Government; including the requirements set out in the MOUs agreed with Government on monitoring and evaluating mitigation delivered and homes unblocked.
- Overseeing of risks and issues with development and delivery of the schemes and projects.

The parties will work together in good faith and in an open, co-operative and collaborative manner. The Member Working Group and Officer Working Group will work together in the spirit of mutual trust in order to successfully implement the Nutrient Mitigation Fund for Norfolk.

Chairman

The Chairman will be the s151 officer from the Accountable Body.

Quorum

A minimum of three of the constituent authorities must be represented at a meeting for any business to be conducted. Substitute members will be permitted, provided they have a good knowledge of the subject matter and have been briefed.

Voting

The group will work on a consensual unanimous basis.
It is therefore not expected that formal voting will be required.

Meeting frequency

The Group will meet as required, but this will be varied to reflect the needs and requirements of the Schemes which are developed and to ensure opportunities are expedited.
Meetings will generally be held in person.

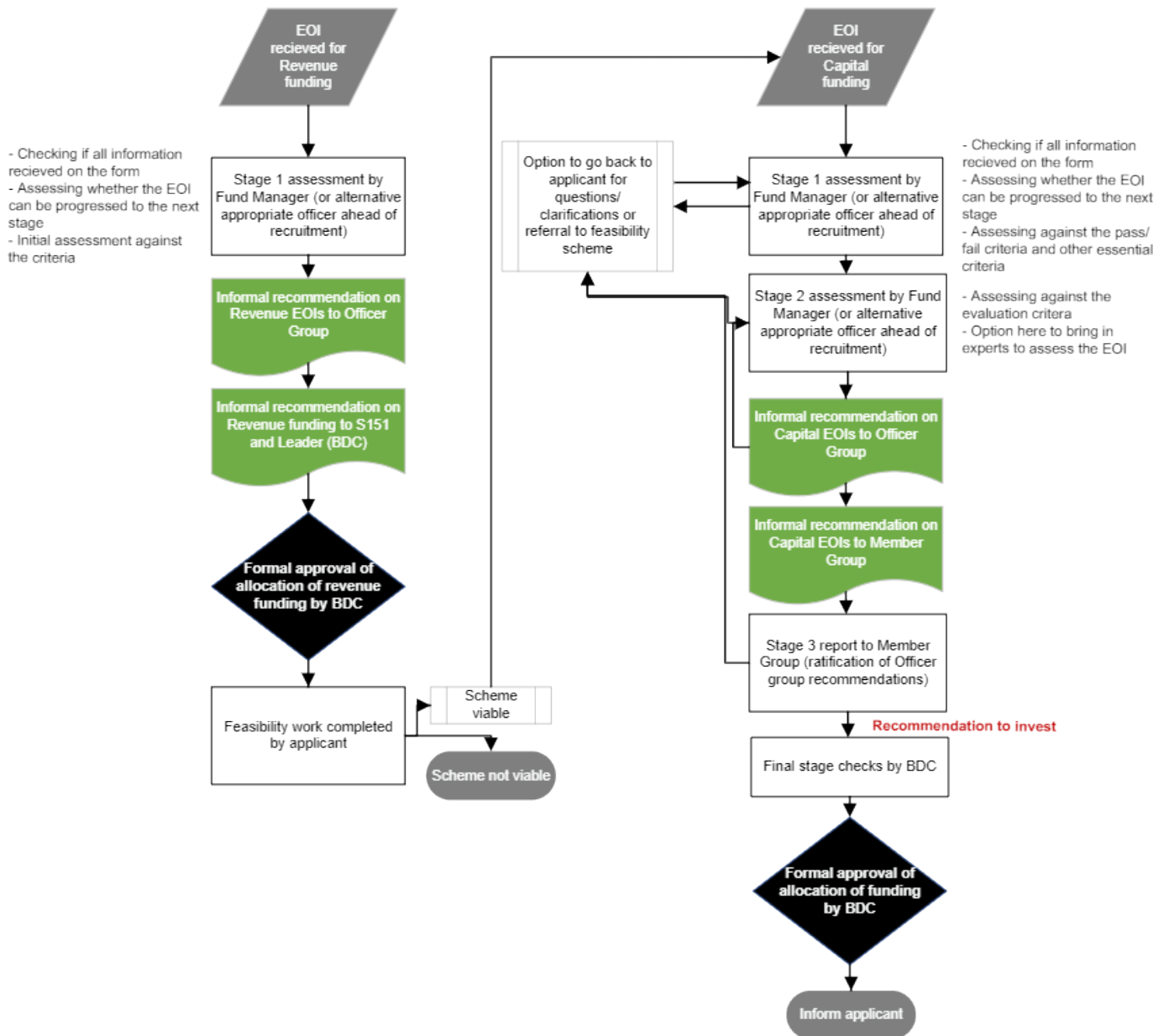
Terms of Reference

The Terms of Reference will only be amended with the agreement of the Group.

Resources

The Group will be supported by BDC as the accountable body for the funds.
The Secretariat will keep notes and actions from the meeting.

Appendix D: Application Process



Agenda Item 10



Cabinet
19 March 2024

STRATEGIC ASSET MANAGEMENT FRAMEWORK

Report Author: Debbie Lorimer
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Portfolio: Leader

Wards Affected: All

Purpose of the Report:

The Council holds a diverse portfolio of property assets. These are a key resource in the delivery of the Council's priorities and have significant value, but also cost money to use and maintain. The proposed Strategic Asset Management Framework provides the basis under which the Council will manage, dispose and acquire property assets.

Recommendations:

Cabinet agrees to recommend to Council:

1. The adoption of the Strategic Asset Management Framework.

1. Summary

- 1.1 The Council holds a significant number of property assets worth circa £29 million (as at the 31 March 2023). This paper proposes the adoption of a Strategic Asset Management Framework to provide a basis on which to manage those assets going forward.
- 1.2 The Strategic Asset Management Framework adheres to the latest guidance on strategic asset management issued by the Royal Institution of Chartered Surveyors (RICS) and the Chartered Institute of Public Finance and Accountancy (CIPFA).
- 1.3 The Asset Management Framework comprises of three elements:
 - An Asset Management Policy
 - A Strategic Asset Management Strategy
 - An Asset Management Working Action Plan
- 1.4 The framework provides the link between the Council's property portfolio and the delivery of its corporate objectives. It outlines why we hold property assets, how they align to the Council's vision and objectives and what actions need to be taken to ensure those property assets are performing effectively and efficiently.

2. Background

- 2.1 The Council owns a diverse property portfolio that has been acquired over time and are held for a variety of purposes. It can be divided into three asset types as described below:
 - Operational - held primarily to support (directly or indirectly) the delivery of council services.
 - Infrastructure Assets – held solely for the purposes of providing infrastructure in the district.
 - Community Assets – held by the council in perpetuity to support recreational, cultural & social well-being of the area.
- 2.2 Over the past few years Broadland has increased its asset base with the purchase of Broadland Country Park, temporary accommodation and the jointly owned Horizon Centre.
- 2.3 In addition to the property owned by the Council, a number of homes are being purchased with the aid of the Local Authority Housing Fund (LAHF) funding, to house Afghan refugees, which will be held by the Council's new property company Broadland Living Limited. These assets will be outside of the Strategic Asset Management Framework.

3. Current position & recommendations

- 3.1 With the growth in property assets it is proposed that Council adopts a Strategic Asset Management Framework in line with CIPFA and RICS best practice, to assist the Council in managing its property assets going forwards.

- 3.2 Appendix A contains a draft Strategic Asset Management Framework for Cabinet to consider. Section 2.1 within the document outlines six principles by which the Council will manage its land and property assets.
- 3.3 The Working Action Plan in section 4 pulls together the property related activities in the Council's Delivery Plan and the Capital Programme. This Working Action Plan will be a living document and will therefore change as the Council approves future delivery plans and budgets.

4. Other options

- 4.1 Cabinet could decide not to adopt a Strategic Asset Management Framework, but this would not be in accordance with best practice and may mean that the Council does not optimise the use of its property assets or maintain them as efficiently and cost effectively as it could.

5. Issues and risks

- 5.1 **Resource Implications** – The proposed Strategic Asset Management Framework includes a programme of condition surveys. The results of these surveys may have budgetary implications if they show a requirement to invest in individual properties to either improve or maintain them at their current standard. The revenue budgets for 2024/25 include the running costs of the current property assets and the capital budget for the next five years from 2024/25 includes a capital maintenance programme for some property assets.
- 5.2 **Legal Implications** – None
- 5.3 **Equality Implications** – None
- 5.4 **Environmental Impact** – The proposed Strategic Asset Management Framework considers the Council's Environmental Strategy and Delivery Plan.
- 5.5 **Crime and Disorder** – None

6. Conclusion

- 6.1 The introduction of a Strategic Asset Management Framework is in accordance with best practice. The framework will outline how the Council manages its property assets going forward to ensure they are performing effectively and efficiently.

7. Recommendations

Cabinet agrees to recommend to Council:

- 7.1 The adoption of the Strategic Asset Management Framework.

Broadland District Council

Strategic Asset Management Framework

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1 Introduction

1.1 Introduction

Broadland District Council like most Local Authorities holds a diverse portfolio of property assets. As a key resource, there is significant value held in Property Assets, but they also cost money to use and maintain.

This document provides an Asset Management Framework under which the Council will manage its property assets and has been compiled with regard to the latest guidance on strategic asset management issued by the Royal Institution of Chartered Surveyors (RICS) and the Chartered Institute of Public Finance and Accountancy (CIPFA).

The Asset Management Framework comprises of three elements:

- An Asset Management Policy
- A Strategic Asset Management Strategy
- An Asset Management Working Action Plan

The framework provides the link between the Council's property portfolio and the delivery of its corporate objectives. It outlines why we hold property assets, how they align to the Council's vision and objectives and what actions need to be taken to ensure those property assets are performing effectively and efficiently.

2 Asset Management Policy

2.1 Asset Management Policy

The Asset Management Policy establishes some clear principles, as outlined below, by which Broadland District Council will manage its land and properties.



Our Vision is:

To undertake an entrepreneurial use of property to encourage community vibrancy; support service delivery and to respond to budget pressures (through cost reduction and income generation).

Policy Objectives and Actions and Behaviours

To achieve the principles above we have listed below six objectives together with the actions and behaviours required to accomplish these.

1. To undertake a corporate approach to property assets.
 - Capital Projects are managed efficiently and effectively and prioritised to support the Council's Strategic Plan.
 - We will have clear corporate decision making and challenge on all property matters.
 - Property budgets managed corporately to prioritise key investment needs.
 - Achieving an effective balance between corporate and service priorities.
 - Ensuring that property information is accurate, current and comprehensive.

Strategic Asset Management Framework

- To coordinate planning for property need in the future.
2. Ensure our operational property services the needs of users now and also in the future.
 - Ensuring property is suitable and sufficient for service delivery.
 - Ensuring property is flexible and is planned to respond to future need.
 - Ensuring property is secure, safe to use and fulfilling statutory requirements.
 - Making our property accessible to all our customers.
 - Working with services to understand their longer-term requirements in order to plan for the future.
 - Working with communities and partners to optimise the use of assets where beneficial.
 - Adopting an area-based approach to planning our service delivery and community shaping.
 3. Provide sustainable properties that are managed effectively and efficiently.
 - Improve the sustainability credentials of the Council's property assets in order to demonstrate best practice , in line with the Council's ambition to achieve net-zero carbon emission by 2030, through exploring viable options to reduce energy consumption.
 - Using renewable energy where appropriate.
 - Using whole life consideration in our business case developments for construction projects reducing energy and water consumption and CO2 omissions. Also taking into consideration the environmental impact of transportation for users.
 - Minimising waste.
 - Ensuring property is suitably managed and maintained within budget constraints.
 - Ensuring reporting is in place to monitor statutory compliance requirements with regards to managing property assets.
 - Seek to maximise income and minimise the cost of our property assets while ensuring our corporate priorities are achieved.
 - Having flexibility in our buildings to facilitate change of working practices in the future.
 - Seeking efficiencies in occupancy and utilisation and introducing new ways of working.
 - Challenging the cost of property activities to drive performance improvement.
 - Challenging the use of assets including disposal where appropriate.
 - Understanding our asset portfolio so we can be agile in responding to funding and government grants such as the Public Sector Decarbonisation Fund.

Strategic Asset Management Framework

4. Optimise the financial return and commercial opportunities of the Council's land and property portfolio, and where possible, to provide an income to support the Council's revenue budgets.
 - To maximise the income from spare capacity within the Council's land and property portfolio
 - Dispose of under-performing and surplus property assets where use of these assets for income generation is not viable for the Council.
 - Seek opportunities to increase the value of assets through change of use.
 - Ensure the Council buildings which are rented out or let are maximising the potential rent and minimising voids to deliver the maximum return.

5. Use the Council's property assets to stimulate development and growth together with supporting local community needs, addressing health inequalities and encouraging new business to the area.
 - Use our assets to stimulate and support regeneration and inward investment.
 - Use investment in the Council's property assets for income generation and to create local employment and training opportunities.
 - Use the Council's capital investments in its property assets to stimulate economic growth, and where appropriate to provide a commercial return to the council to support the revenue budget.
 - Use the Council's assets to address health inequalities as identified in the Council's health and Wellbeing Strategy.
 - Identifying potential sites which could be brought forward for housing and/or employment development.

6. Work with Partners where it will benefit service users and/or secure efficiencies.
 - Where appropriate work with other agencies and partners to promote co-location and joint service delivery, using public sector property assets as a catalyst to transform public services.
 - Support the one public estate programme to seek to drive efficiencies in operation and management of our property assets as well as those of our partners.
 - Support growth and regeneration by releasing redundant public sector land and buildings, generating capital receipts for reinvestment in services.
 - We will also work with partners and enable communities where they are better placed to manage property and deliver services.

This policy and associated strategy and action plans have a medium-term (3-5 years) planning horizon and will be updated periodically. It is restricted to consideration of the property assets that the council owns or uses.

3 Strategic Asset Management Strategy

3.1 Purpose & Scope of the Strategic Asset Management Plan

This Strategic Asset Management Plan (SAMP) identifies the key strategic policy and resource influences affecting Broadland District Council and in response to these sets a broad direction for asset management, enabling its property portfolio to be optimised to meet identified needs.

It is intended as a practical tool which helps to define, implement and measure how the council: -

- Makes its property investment decisions.
- Maintains and improves its property assets.
- Increases the cost effectiveness of its property portfolio.
- Ensures the property portfolio is 'fit for purpose'.
- Promotes innovation and development in property asset management.
- Listens and responds to property users.

This is an overarching strategic asset management plan which includes operational assets, but under which sets a specific asset management plan for Community & Infrastructure Property Assets.

The plan has a medium-term (3-5 years) planning horizon and will be updated periodically. It is restricted to consideration of the property assets that the council owns or uses.

3.2 Overview of the Portfolio

The council has a small but diverse property portfolio. It contains a mix of asset types which have been acquired and are held for a variety of purposes. The portfolio can be categorised into three broad asset classes – each of which have their own management objectives. These are summarised in simple terms in the table below.

Asset Class	Management Objectives			
Operational Assets – held primarily to support (directly or indirectly) the delivery of council services	Functional Suitability	Running Cost	Condition	Carbon Efficiency

Strategic Asset Management Framework

Infrastructure Assets – held solely for the purposes of providing infrastructure in the district	Ease of Access	Costs of maintaining	Condition	Carbon Efficiency
Community Assets – held by the council in perpetuity to support recreational, cultural & social well-being of the area.	Ease of Access	Costs of maintaining	Opportunity Cost	Carbon Efficiency

Note: This excludes assets owned by Broadland Living Ltd
The number of assets in each asset class and their asset value is given in the table below.

Asset Class, Type & Use			Number	Asset Value ¹ £000s
Operational Assets	Administrative	Offices	3	18,721
	Service	Business Support Centre	1	714
		Depots	1	253
		Temporary Accommodation	2	500
		Car parks	5	1,258
		Public Conveniences	5	357
		Quay	1	428
		Bure Valley Railway	1	362
		Shared Equity	1	109
		Land	1	111
Infrastructure Assets		Street Lighting		125
		Land Drainage		25
		Bridges		148
		Quay – moorings & furniture		22
		Bure Valley Railway – fencing		27
		Broadland Country Park		378
	Cycle Paths	Marriotts Way & Bure Valley		N/A
Community Assets		Commons & Parish Land	Inc.	N/A
		Countryside Sites	Inc.	N/A
		Broadland Country Park	1	719
		Amenity Land	1	3
	Surplus Assets		8	5,197
			Total	£29,457

¹ Asset value is for capital accounting purposes and is not necessarily related to market value as at 31/03/203

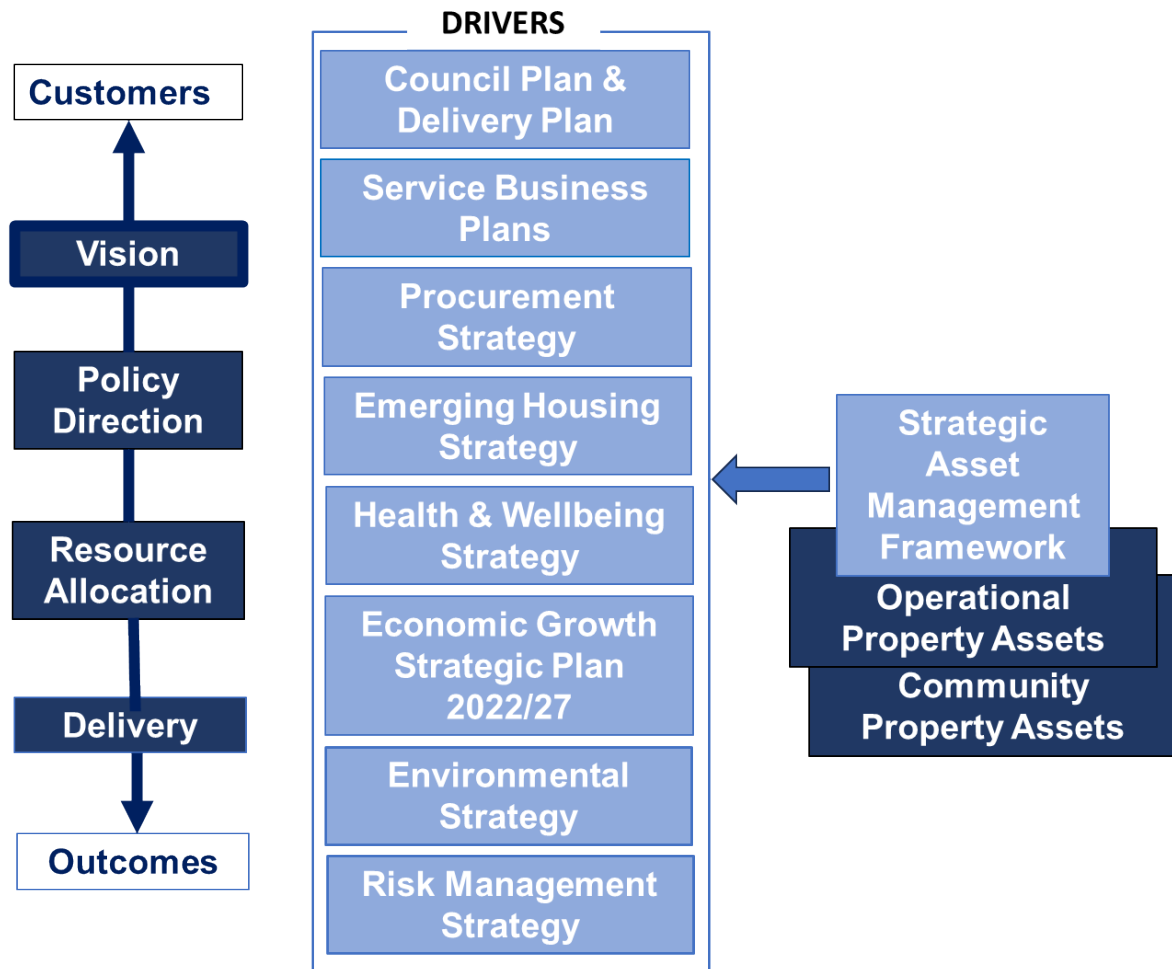
3.3 Links to Other Plans and Strategies

The SAMP does not exist in isolation but is set against wider corporate and service strategies. The SAMP itself is amplified through a range of supporting strategies and policies. The positioning and linkage of the SAMP to these is illustrated in Diagram 1 below. The SAMP focuses principally on the Council's

Strategic Asset Management Framework

operational property assets with other parts of the portfolio having a complimentary but discrete strategy.

Diagram 1 – The Links between the SAMP and other Strategies



3.4 Strategic Context and Direction

Influences for Change

There are a range of influences that are driving change in the area and to which the council must respond through its portfolio management. These can be recognised at a national and regional level and locally through the council's policies and initiatives.

National and Local Context

Nationally, local government and the public sector as a whole are looking to transform the way they work in order to provide a better service to residents, gain greater influence and resilience and address key national challenges. Trends over the last decade or so have shown significant cuts in funding for councils from central government and general lower spend across public services.

Financing and resources

Local government and the public sector as a whole is facing unprecedented challenges, not only in terms of financial pressures, but also in terms of demographic changes. At a national level, there is a shifting policy picture, with implications for the Council's duties and expectations of different ways of working across a range of activities, and for how we are funded. Nationally, [DCN research](#) in October 2023 revealed expectations of a funding shortfall of £1.1bn in funding over 2023-24 and 2024-25. Reduced funding means we need to be creative with how we deliver our services, constantly reviewing opportunities for new funding opportunities and transforming how we do things.

Devolution

Devolution is the transference of power and funding from national to local government, with the aim of de-centralising decision making and giving local areas more flexibilities and freedoms. Government released in 2022, their Levelling Up White Paper, followed by the royal assent of the Levelling Up and Regeneration Bill. In Norfolk, the County Council were invited to submit a County Deal which is due to be formally decided upon in the coming months (the deal has been agreed 'in principle'). This will have implications and potential opportunities for the Councils in Norfolk in the future.

Health and wellbeing

Within the district we have a growing ageing population which is above the national average. While we have a higher than national average of active residents, 60% of adults are classed as overweight or obese and a concerning

number of children are also classed as obese. These challenges will place additional demand on health services which are already under pressure and difficult to access. Other challenges that impact on wellbeing are fuel poverty and low-income families.

Housing provision

Demand for housing is outstripping provision and with a reduction in the number of homes available for private rent there have been large rent increases. Rental increases or mortgage interest increases, together with price increases for essential goods and services have resulted in families struggling financially. This has resulted in a significant increase in demand for temporary accommodation. There is an opportunity to help those in energy inefficient housing to reduce both their costs and carbon footprint.

Climate Change

The effects of climate change including an increased risk of flooding present global, national and local challenges. The rurality of the district brings environmental challenges with reliance on cars and fuel poverty. There are challenges around high energy prices and an above average proportion of homes that are difficult to make more energy efficient. Having set an emissions 2030 target in 2022, followed by the declaration of a Climate and Biodiversity Emergency in July 2023, there is an emphasis on taking action within our resources and powers as a Council. Working with partners, local businesses and communities to reduce carbon emissions, enhance energy efficiency and lower energy costs within the district. The Council is a founder member of Norfolk Environmental Credits, a public partnership which is tackling the reduction of nutrients in the local watercourses and looking to improve biodiversity locally.

Local economy

The impact of inflation on rising prices has increased the pressure on an already struggling retail sector and the local high street. A reduction in shops and services in local high streets has led to residents, in more rural areas with limited public transport, having problems accessing goods and services. Broadland has 14.8% of residents who are currently economically inactive, so ensuring there is a workforce with the right mix of skills to match business need is key.

3.5 Council Initiatives

The Council recognises that in meeting its aspirations for the community it serves it too has to change. These changes need to improve value for money

in services and support prosperity of the area. There are a range of corporate initiatives to which the management of the property portfolio must respond. These are articulated through Broadland District Council's Our Strategic Plan for 2024-2028. "Our vision is to support our residents to lead happy, healthy and fulfilled lives." To achieve this the Council intends to focus resources and efforts in five areas. These are: -

- **Empowering individuals and communities**
 - Create a district where individuals are empowered, enabled and supported to live their best lives, where health and wellbeing is promoted, and communities thrive.
- **Providing the right homes in the right places**
 - Create a district where all residents have access to safe, and affordable, energy efficient housing, leading to thriving, inclusive communities that promote overall wellbeing.
- **Cleaner, greener Broadland**
 - To think globally and act locally with low-carbon solutions and safeguards for the natural environment through working collaboratively and innovatively to respond effectively to the climate and biodiversity crisis.
- **Sustainable, resilient local economy**
 - Enable a transition to well paid, green jobs locally and support our local economy to thrive, both homegrown businesses, large and small.
- **A modern, caring Council safeguarding our future.**
 - We want to make it easy for our residents and businesses to access our services and receive the help and support they need.

These priorities and the activities that will be undertaken to deliver them, all have an impact on how the Council manages its portfolio of property assets. The direction for asset management must be responsive to, and supportive of these priorities, and individual actions in managing the Council's properties must directly support these priorities. To do this the Council recognises that within the scope of asset management it will need to: - improve the range of housing to meet local needs through its housing company and deliver more affordable and temporary housing; improve its waste depot to continue to offer a high quality waste service, continue to invest in its infrastructure assets such as lighting, public conveniences, car parks, the Bure Valley Railway path and Marriotts Way, work with partners to obtain funding to deliver community assets,

and work in partnership with other agencies to deliver services with the potential to share assets to reduce costs.

3.6 Resource Context

The Council is facing significant budget pressures over the medium term. The council is responding to these pressures through a combination of reducing expenditure and making efficiencies through a transformation approach. In addition, rather than reducing services the Council is committed to developing new income streams and using innovative and devolved funding schemes to support the revenue budget.

There is a budget shortfall of £0.2 million over the five years to 2028/29, the medium-term plan already includes a £1.6 million reduction over this period in the cost of services, as a result of its transformation plans but will continue to look for further opportunities.

Within the operational asset portfolio there will be a need to bear down on overall operating costs and generate additional income where possible through co-locating with partners and the leasing out of spare capacity. There is a requirement to review the Council's property assets to assess the amount of future investment required to keep them operating efficiently and to determine whether to dispose of any assets, maximising the return from any disposals.

3.7 Strategic Direction

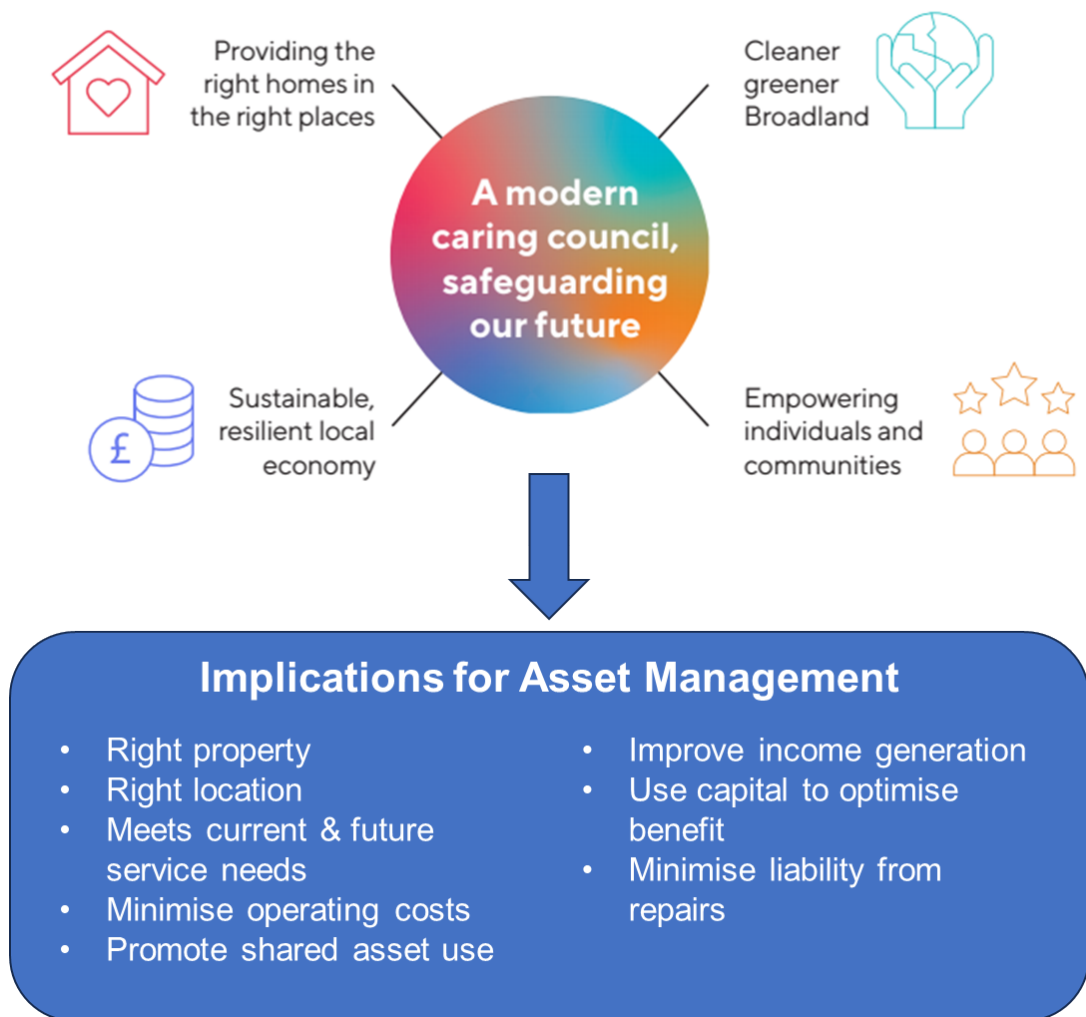
The planning context outlined in sections 3.4 to 3.6 above implies a revised direction for asset management focussed on ***an entrepreneurial use of property to encourage community vibrancy; support service delivery and to respond to budget pressures (through cost reduction and income generation)***. In the future asset management needs to: -

- Adopt a robust approach to allocation of capital with investment directed to supporting council's priorities and to assets with greatest need / likely benefit.
- Lower the operating costs of property.
- Support through One Public Estate the provision of seamless, integrated access to public services through joint working with partner agencies to create multi-agency service facilities – a 'locality-based model' for public service.

Strategic Asset Management Framework

- Prioritise those open spaces which add value to the local area by providing significant amenity and resource to the local community.
- Encourage partner organisations to retain and enhance their facilities to support locality working and to help sustain vibrancy in market towns and rural communities.
- Minimise costs to the council by reducing the maintenance liabilities of assets within the portfolio that do not significantly contribute to the Strategic Asset Management Plan's objectives as outlined in 3.5 of this document.
- Take a more commercial approach to the management of all property assets to optimise income generation.

Diagram 2 – The Relationship between the Corporate Plan and Asset Management



4 Strategic Asset Management Action Plan

4.1 A Framework for Action

Looking forward there are a number of actions required to respond to the challenges identified in the strategy above in section 3. An action plan is presented below. The actions are referenced to the Council's Strategic Plan 2024/28 priorities. The funding implications and timing of these actions are identified where these are known.

Actions	Providing the Right Homes in the Right Places	Empowering Individuals and Communities	Sustainable, Resilient Local Economy	Cleaner, Greener Broadland	A Modern Caring Council	Indicative Timing (completed by)
• Undertake condition surveys on all buildings within the next four years, looking ahead 25 years to inform individual reviews and capital programme	■	■	■	■	■	27/28
• Optimisation of council owned land				■		Q3 24/25
• Develop business case for Taverham Hub		■				Q3 24/25
• Implementation of environmental improvements to owned & leased housing stock	■					Q4 25/26
• Street Lighting – per programme		■				Every year
• Car Park Improvements – per programme		■				Every year
• Bure Valley Railway/Marriotts Way Bridge works per programme		■				Every year
• Public Conveniences		■				25/26
• Aylsham Gym and Fitness Hub		■				24/25
• Nest multi-sport indoor community hub		■				24/25
• Horizon Centre – per programme from 25/26	■	■	■	■	■	Every year
• Refurbishment of Frettenham Waste Depot					■	Q3 24/25
• Local Authority Housing Fund. Purchase of Temporary Accommodation and Resettlement Homes Phase 1.	■					Q1 24/25
• Temporary Accommodation. Transfer the property management to external provider, including provision of proactive management plan	■					Q3 24/25
• Design and build Visitor Centre at Broadland Country Park			■			Q4 25/26
• Delivery of Plumstead Road Infrastructure enhancement works			■			Q4 25/26

4.2 Service Strategies & Implications for the Operational Portfolio

There are a number of service strategies to which the management of the operational portfolio needs to respond. The major operational asset holdings are summarised below with a concise summary of future direction and required actions with any implications identified.

- **Offices** -The Council jointly owns its main headquarters, the Horizon Centre, with South Norfolk Council. This flagship building is the focal point for delivering the majority of the Council activities. The building is highly sustainable with over 2,500 photovoltaic on site and in Q4 23/24 has removed the gas boilers with the installation of air source heat pumps. The previous home of the Council, Thorpe Lodge, is up for sale.
- **Frettenham Depot** – The Council owns the freehold of Frettenham Depot from which Veolia provides the Council’s waste services. This is currently undergoing a refurbishment to bring the depot up to standard and fit for the future. There continues to be growth in the demand for waste services as the number of residential properties within the district increases. Alongside this, recent legislation is bringing in new obligations in the treatment of waste. Broadland Council, in anticipation of the new legislation, has already rolled out its food waste collection service across the district. Additional services and growth in demand necessitates additional space within the depot for extra waste vehicles.
- **Temporary Accommodation** - Provision of temporary accommodation is a statutory responsibility and the council will need to provide in the future according to demand. The Council adopts a risk-based approach according to client needs and will use the private sector if its own accommodation is full or where some client support may be needed. The Council is moving to a model where the management of the portfolio of accommodations is provided by an external provider, providing a suitable service to ensure the safety of the occupants and the timely resolution of property related issues. A strategic management plan will be put into place to effectively manage the maintenance and upkeep based upon conditions surveys and an approve maintenance regime. There are plans to improve the carbon efficiency of our owned and private sector leased properties to meet the Council’s net-zero 2030 targets.
- **Local Authority Housing Fund** – The Council has successfully secured funds to purchase at least 9 homes to serve as a mix of Temporary Accommodation and resettlement. There are further opportunities to secure more funding which the Council is applying for to secure additional homes. It is seeking to transfer the resettlement properties to

its wholly owned company Broadland Living Ltd and is developing a model for an external provider to manage this portfolio in line with the Temporary Accommodation.

- Green spaces and natural areas – The Council owns and manages a variety of open spaces across the district. Some are large and are managed as important natural areas (woodlands, and Broadland Country Park for example. These spaces offer vital outdoor access and recreational space for local communities, but area also places in which biodiversity thrives. There are also many smaller, more formal amenity spaces that the Council manages. These may have play areas within them, tree planting and are often managed in a more formal way to the larger green spaces. The Council also manages several graveyards.
- Community Infrastructure – The Council is responsible for the management and maintenance of community infrastructure such as car parks with Electric streetlights, bridges and culverts. These provide a service to local communities.

4.3 The Community Assets and Infrastructure Portfolio

This Strategic Asset Management Framework provides an overarching framework which defines how the Council will actively manage these assets to the maximum benefit of the council and the wider community for the mid to long term. Community assets are defined to include: Common Land – Registered commons subject to Schemes of Regulation; ‘Commons’ – Non registered ‘Public Open Space’; parks, countryside areas and public open space; trees and planting; easements and rights (such as grazing rights, agricultural tenancies) and infrastructure Assets (street lighting, railways, cycle paths, car park areas, playgrounds and play equipment, public toilets, benches etc.). As such the strategy encompasses buildings, land, rights and equipment.

These may be held or “managed” by the council on behalf of the community in a number of different ways including freehold ownership; ownership by third parties; held by the Council under Lease/license/agreement for community benefit or as assets held by others into which the Council has an input via various mechanisms, management, financial, advisory.

4.4 Key Achievements in 2018-24

Strategic Asset Management Framework

The Council has demonstrated its commitment to asset management through a range of initiatives. Whilst not an exhaustive list some of the more significant achievements include: -

- The Broadland Food Innovation centre opened in September 2022 to provide the optimum environment for SME's and start-up food and drink businesses. The Council developed and built the centre with support from the New Anglia LEP, Hethel Innovation and the UEA. The project which, included both the building and also bespoke advice and guidance to this economic cluster, received £5.7m from the European Regional Development Fund (ERDF).
- In September 2022 the Council jointly purchased with South Norfolk Council the Horizon Centre as its flagship headquarters. The building is 84% more environmental efficient than the Councils' previous two headquarters. Not only is its environmental credentials significantly better, contributing to both Councils' ambitions to be net- carbon zero by 2030 it is also substantially cheaper to run. In addition there is also the opportunity to generate income from the lease of the Annex, an ancillary building and the mezzanine floor of the main building. This is supplementary to the income generated from hosting partners and renting out the Conference Centre. In Q1 23/24 the environmental credentials of the office building were further improved with the cessation of the use of gas with the introduction of air-source heat pumps as a consequence of being awarded funding from the Public Sector Decarbonisation Scheme (PSDS).
- The Council formed Broadland Growth Limited in 2014 in partnership with NPS Consultants Limited (subsequently the NPS shares transferred in 2021 to Norse Group Holdings Limited) to develop residential properties. In 2021 the company completed its second site at Roseberry Fields, a development of 30 dwellings.
- An upgrade programme to more efficient and environmental street lighting provision began in 2021/22, after which the management of the majority of the streetlights was then transferred to the local towns and parish councils.
- Since 2021/22 there has been a major programme of overhaul and renovation of the infrastructure relating to the Bure Valley Railway facilitated by £1.2m of funding from the Interreg Visitor Economy fund.
- In 2022/23 the Council carried out a programme of major resurfacing of some of its Car Parks.
- In 2019 Broadland District Council, with funding from the Greater Norwich Growth Board, purchased a 56 hectares of heathland, woodland

and fenland in the Parish of Felthorpe. This area, and a section of nearby coniferous woodland that the Council lease and manage, is known as Broadland Country Park. The site has a circular path which is suitable for year-round access for pram and wheelchair users, has a series of child friendly off-road cycle trails and a network of woodland paths and trails. There are plans to expand the facilities at the site by providing a catering kiosk and toilets and enhanced parking provision.

4.5 Problems & Pressures in the Portfolio

A number of issues have been identified which may inhibit the effective management of the Council's property assets or which represent an incipient risk to the Council. These are not considered significant at this stage but are referenced in order to raise awareness so that appropriate corrective action can be taken in a timely manner as appropriate.

- **Consistency with 'Best Practice'** – The Council is managing its property portfolio in an effective way with its procedures consistent with the relatively small size of portfolio. Officers have set up a Capital Programme Board to have an oversight of the property and infrastructure elements of the capital programme as the delivery involves multiple teams. Through this mechanism Officers monitor the delivery of the individual projects. Any material issues are raised up through Corporate Management Team and then onto Cabinet, who also receive monitoring information on the capital projects as part of the quarterly performance, finance and risk management reports. There are, however, some areas where current practice is not fully consistent with recommended 'best practice' in asset management. These include the lack of current condition surveys for the majority of property assets and poorly developed asset review processes. This will be addressed in the Asset Management Plan going forwards.
- **Maintenance & Statutory Compliance** – Whilst the Council has good informal knowledge of the condition of its building stock there is a lack of a systematic approach to undertaking conditions surveys. Processes however are now in place to ensure compliance with regulations, with suitable periodic checks and servicing being carried out. These processes need to be reviewed and applied to all of the Council property-based assets.
- **Capacity & Expertise** – Over the past year there has been a substantial increase in the number of temporary accommodation properties that the Council owns. This increase in property assets means the Council

requires more capacity and expertise going forward to ensure it uses its assets in the most efficient and effective way. This additional capacity and expertise can be provided in a number of different ways and going forward it would be beneficial to look at how property assets are managed across the Council and the One Team to ensure the most efficient and economic model is utilised.

4.6 Ownership/monitoring of Actions

It is essential that both the overarching Action Plan and the individual Action Plan for the Community Assets are monitored and reported on. Currently the management of individual property assets are devolved to the service areas with no overall individual or team taking strategic responsibility. This approach will be reviewed with Cabinet.

The Council's constitution delegates authority for property assets under Part 3 – Responsibility for functions:

Section 19.15 responsibilities delegated to officers in consultation with the portfolio holder.		
13	To carry out the role of corporate property officer in accordance with the council's asset management plan responsibilities.	Managing Director
14	Where not already delegated to another portfolio holder or officer, to negotiate, agree and conclude the terms and conditions of the acquisition of land and property where the principle of purchase has been agreed by the relevant portfolio holder.	All Assistant Directors
Section 19.6 responsibilities delegated to officers		
2	To consent to transfers of interests in residential property charged to the council.	Assistant Director of Finance

The Council's constitution also details at Part 2 – Rules of Procedure, the Financial Procedure Rules. Section 19 details the recording of land and property owned by the Council at: [broadland-district-council-constitution \(southnorfolkandbroadland.gov.uk\)](http://broadland-district-council-constitution(southnorfolkandbroadland.gov.uk))

The Action Plans will be delivered through a combination of in-house teams such as the facilities team as well as third party suppliers and contractors.



Forward Plan

The Forward Plan sets out the decisions that the Cabinet will be taking over the coming months. The Plan identifies which decisions are key and also highlights the decisions that Cabinet intend to take, which may result in part of the meeting being held in private.

This document will be updated and republished on the Council’s website each month. Any queries relating to the Plan should be forwarded to Democratic Services, Horizon Centre, Peachman Way, Norwich, NR7 0WF, or via email at committee.bdc@southnorthfolkandbroadland.gov.uk

What is a Key Decision?

Key Decisions are those that are likely:

- (a) to result in the local authority incurring expenditure which is, or the making of savings which are, significant having regard to the local authority’s budget for the service or function to which the decision relates; or
- (b) to be significant in terms of its effects on communities living or working in an area comprising two or more wards or electoral divisions in the area of the local authority.

Why might a decision be made in private?

The public may be excluded from a meeting whenever it is likely that in view of the nature of the business to be transacted, exempt information will be disclosed, for example, information which may reveal the identity of an individual or relates to the financial or business affairs of an individual or organisation. Information should only be made exempt, if it is in the public interest to do so.

Members of the Cabinet:

Susan Holland (Chairman)	- Policy	Jan Davis	- Environmental Excellence
Natasha Harpley (Vice-Chairman)	- Communities & Housing	Steve Riley	- Finance
Stuart Beadle	- Planning	Dan Roper	- Transformation & Organisational Development
Martin Booth	- Economic Development		

Subject / Decision	Decision Maker	Decision Due Date	Key Decision?	Responsible Officer	Portfolio	Public or Exempt
March 2024						
Business Case for Opportunities Funded Posts	Broadland Cabinet	19 Mar 2024	Yes	<i>George Denton, Assistant Director of Economic Growth george.denton@southnorfolkandbroadland.gov.uk</i>	Broadland Portfolio Holder for Economic Development	Fully exempt
Asset Management Strategies	Broadland Cabinet	19 Mar 2024	No	<i>Debbie Lorimer, Director of Resources debbie.lorimer@southnorfolkandbroadland.gov.uk</i>	Broadland Portfolio Holder for Finance	Public
	Broadland Council	28 Mar 2024				
Greater Norwich Local Plan: Adoption	Broadland Cabinet	19 Mar 2024	Yes	<i>Paul Harris, Place Shaping Team Manager paul.harris@southnorfolkandbroadland.gov.uk, Mike Burrell, Greater Norwich Planning Policy Manager mike.burrell@norfolk.gov.uk</i>	Broadland Portfolio Holder for Planning	Public
	Broadland Council	28 Mar 2024				

Subject / Decision	Decision Maker	Decision Due Date	Key Decision?	Responsible Officer	Portfolio	Public or Exempt
Performance Report Quarter 3	Broadland Cabinet	19 Mar 2024	No	<i>Corinne Lawrie, Assistant Director of ICT/Digital and Transformation corinne.lawrie@southnorfolkandbroadland.gov.uk, Helen Hall, Performance Lead helen.hall@southnorfolkandbroadland.gov.uk</i>	All	Public
Nutrient Neutrality Mitigation Scheme Governance	Broadland Cabinet	19 Mar 2024	Yes	<i>Rodney Fincham, Assistant Director of Finance rodney.fincham@southnorfolkandbroadland.gov.uk</i>	Broadland Portfolio Holder for Policy (Leader)	Public
Social Prescribing - One Norwich	Broadland Cabinet	19 Mar 2024	Yes	<i>Mike Pursehouse, Assistant Director of Individuals and Families mike.pursehouse@southnorfolkandbroadland.gov.uk, Kerrie Gallagher, Help Hub and Communities Senior Manager kerrie.gallagher@southnorfolkandbroadland.gov.uk</i>	Broadland Portfolio Holder for Communities & Housing (Deputy Leader)	Fully exempt

Subject / Decision	Decision Maker	Decision Due Date	Key Decision?	Responsible Officer	Portfolio	Public or Exempt
April 2024						
DAHA Client Policy	Broadland Cabinet	23 Apr 2024	No	<p><i>Mike Pursehouse, Assistant Director of Individuals and Families</i> <i>mike.pursehouse@southnorfolkandbroadland.gov.uk,</i> <i>Richard Dunsire, Strategic Housing and Independence Senior Manager</i> <i>richard.dunsire@southnorfolkandbroadland.gov.uk,</i> <i>Sarah Oldfield, Partnerships & Innovation Lead</i> <i>sarah.oldfield@southnorfolkandbroadland.gov.uk</i></p>	Broadland Portfolio Holder for Communities & Housing (Deputy Leader)	Public
	Broadland Council	23 May 2024				
Revised Complaints Policy	Broadland Cabinet	23 Apr 2024	No	<p><i>Hannah Mawson, Customer Experience and Insight Lead</i> <i>hannah.mawson@southnorfolkandbroadland.gov.uk</i></p>	All	Public
	Broadland Council	23 May 2024				
Housing - Policy & Strategy Implementation & Updates	Broadland Cabinet	23 Apr 2024	No	<p><i>Mike Pursehouse, Assistant Director of Individuals and Families</i> <i>mike.pursehouse@southnorfolkandbroadland.gov.uk,</i> <i>Richard Dunsire, Strategic Housing and Independence Senior Manager</i> <i>richard.dunsire@southnorfolkandbroadland.gov.uk</i></p>	Broadland Portfolio Holder for Communities & Housing (Deputy Leader)	Public
	Broadland Council	23 May 2024				

Subject / Decision	Decision Maker	Decision Due Date	Key Decision?	Responsible Officer	Portfolio	Public or Exempt
Bure Valley Railway Lease Agreement	Broadland Cabinet	23 Apr 2024	Yes	<i>George Denton, Assistant Director of Economic Growth george.denton@southnorfolkandbroadland.gov.uk</i>	Broadland Portfolio Holder for Economic Development	Fully exempt
Community Asset Strategy	Broadland Cabinet	23 Apr 2024	Yes	<i>Petra Maryon, Community Assets Manager petra.maryon@southnorfolkandbroadland.gov.uk</i>	Broadland Portfolio Holder for Economic Development	Public
Frettenham Brookfield Depot Update	Broadland Cabinet	23 Apr 2024	Yes	<i>Simon Phelan, Assistant Director of Community Services simon.phelan@southnorfolkandbroadland.gov.uk</i>	Broadland Portfolio Holder for Environmental Excellence	Fully exempt

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Agenda Item 14

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