

South Norfolk Cabinet

Agenda

Members of the South Norfolk Cabinet:

The Lord Fuller OBE (Chairman)
Cllr Kim Carsok
Cllr Richard Elliott
Cllr Keith Kiddie

Cllr Daniel Elmer (Vice-Chair)
Cllr Graham Minshull
Cllr Lisa Overton-Neal

Date & Time:

Monday, 18 March 2024
9.00 am

Place:

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

Contact:

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Website: 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-iPyRlmsTCIng>

If a member of the public would like to attend to speak on an agenda item, please email your request to committee.snc@southnorfolkandbroadland.gov.uk, no later than 5.00pm Wednesday, 13 March 2024.

Large print version can be made available

If you have any special requirements in order to attend this meeting, please let us know in advance.

AGENDA

1. **Apologies for absence**

2. **Urgent Items**
Any items of business which the Chairman decides should be considered as a matter of urgency pursuant to section 100B(4)(b) of the Local Government Act, 1972. Urgent business may only be taken if, “by reason of special circumstances” (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency.

3. **Declarations of interest** (Pages 4 - 6)
To receive declarations of interest from Members (guidance attached).

4. **Minutes** (Pages 7 - 15)
To confirm the minutes from the meeting of the Cabinet held on 12 February 2024.

5. **Greater Norwich Local Plan: Adoption** (Pages 16 - 110)

6. **Tasburgh Neighbourhood Plan - Consideration of Examiner's Report** (Pages 111 - 165)

7. **Strategic Performance, Risk and Finance Report for Quarter 3 2023/24** (Pages 166 - 241)

8. **Strategic Asset Management Framework and Commercial Property Asset Management Strategy** (Pages 242 - 292)

9. **District Direct Funding** (Pages 293 - 299)

10. **Forward Plan** (Pages 300 - 306)

Agenda Item 3

Interests Flowchart

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

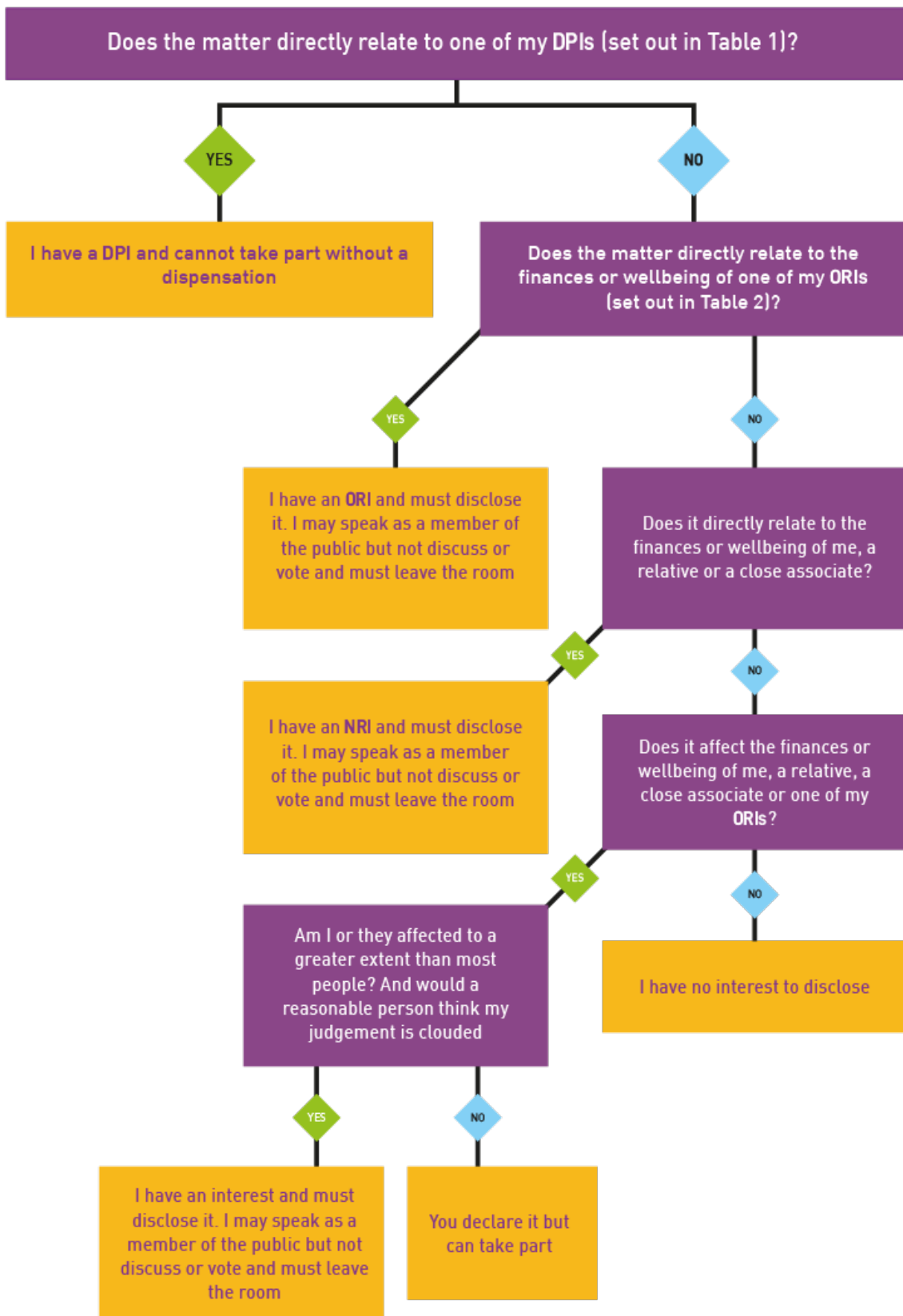


Table 1: Disclosable Pecuniary Interests

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



SOUTH NORFOLK CABINET

Minutes of a meeting of the South Norfolk Cabinet of South Norfolk Council, held on Monday, 12 February 2024 at 9.00 am.

Committee Members Present: Councillors: J Fuller (Chairman), D Elmer (Vice-Chair), K Carsok, R Elliott, G Minshull and L Overton-Neal

Apologies for Absence: Councillors: K Kiddie

Officers in Attendance: T Holden (Managing Director), P Courtier (Director of Place), D Lorimer (Director of Resources), J Sutterby (Director of People and Communities), E Hodds (Chief of Staff), R Fincham (Assistant Director of Finance), 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), S Pontin (Planning Business Improvement Team Manager), S Carey (Strategic Advisor and Deputy Monitoring Officer), G Pell (Corporate Accountant) and L Arthurton (Democratic Services Officer)

Also in Attendance: Cllrs: C Brown, J Cook, T Laidlaw, M Rosen, J Rowe and J Webber

3199. APOLOGIES FOR ABSENCE

An apology for absence was received from Cllr K Kiddie.

3200. DECLARATIONS OF INTEREST

In reference to Minute no.3207 Cllr Elliott declared an 'Other Registrable Interest' as a Director of Big Sky.

3201. MINUTES

The minutes of the meeting held on 15 January 2024 were confirmed as a correct record.

3202. ANNOUNCEMENTS

Cllr Elmer noted that the Council had taken another step forward in its journey to achieving Net Zero with the gas being turned off and the building now being heated fully by ground-source heat pumps. This had been made achievable by a £2.3 million grant from the Public Sector Decarbonisation Fund.

The Managing Director congratulated Cllr J Fuller on his elevation to the House of Lords, which had been endorsed by his Majesty the King. He presented Cllr Fuller with a gift on behalf of all officers at the Council. Cllr Fuller thanked the Managing Director and added that it was an honour to have been chosen for a seat in the Upper House.

3203. REVENUE BUDGET AND COUNCIL TAX 2024/25

Members considered the report of the Assistant Director of Finance, which provided information affecting the Council's revenue budget for 2024–25, in order for the Cabinet to make recommendations to Council on 21st February regarding the Council's budget and council tax for 2024–25.

The Chairman introduced the report, noting that members had the opportunity to have a full debate when the reports went to Full Council, with the meeting today giving members the chance to review the facts of the reports. He also noted that there was a Scrutiny meeting taking place later in the week, which would also review some of the reports.

Turning to the report, the Chairman noted that there had been a large number of variables, including the interest income being greater than expected. There was also a one-off VAT refund of £854,452 that could be allocated to different areas of the Council. He further explained that there would be some changes to the report between now and the Full Council meeting, and conversations with all group leaders would be taking place to review where the additional funds could be allocated.

The Chairman drew Cabinet's attention to the turnover of the Council, which was over £54 million and with staffing levels over 700 with the Council's collaborative working with Broadland Council. He also stressed the importance of the grants the Council receives, business rates, and commercial income, which were set out in the report. Members were also informed that the Band D level of Council Tax would be increased by £5 to £170.00.

Cllr Elliott noted that the report set out the various steps involved in setting the budget, which comprised the assessment of the cost of services, budgeting for other types of income and expenditure, and taking account of Government funding, which had seen an increase from the previous years. The report also assessed Business Rates income and identified the income that needed to be collected from Council taxpayers. The proposed increase of £5 for Council Tax equated to a below-inflation rate.

He further noted that, overall, the Council was looking to deliver a balanced budget with no need to draw on general reserves. With reference to paragraph

2.20, Cllr Elliott noted that a small typo had been made; with the figure being £2m, instead of £2.5m being transferred to a capital reserve. In summarising, he noted that when the report was written, the final Local Government settlement had not been published. The figures have now been received and reviewed, so there was no longer a need for the delegation as set out in recommendation one of the report.

The Assistant Director for Finance added that as the Section 151 Officer, his advice was that the budget was robust and the level of reserves was adequate.

The Chairman summarised the salient points of the report, noting the report would be reviewed by the Scrutiny Committee later in the week and at the Full Council meeting on 21 February 2024. He also noted that the Council could not rely solely on grants, and that the commercial income that the Council brought in was vital to its operations and would help keep Council Tax low. He further noted the risks included in the report, highlighting the cost of waste, recycling, processing and the possibility of reforms to the New Homes Bonus.

It was then;

RESOLVED

1. TO RECOMMEND TO COUNCIL

- (i) The approval of the 2024/25 base budget.
- (ii) That the Council's demand on the Collection Fund for 2024/25 for General Expenditure shall be £9,046,550, and for Special Expenditure shall be £7,511.

2. To Agree

- (i) Changes to the proposed fees and charges as set out in section 6.

3. To Note

- (i) 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.
- (ii) The Medium-Term Financial Strategy projections

Reasons for Decision

The report was a factual account.

Other Options Considered

None

3204. CAPITAL STRATEGY AND CAPITAL PROGRAMME 2024/25 TO 2028/29

Members considered the report of the Assistant Director of Finance, which presented the Capital Strategy and Capital Programme for 2024/25 to 2028/29.

The Chairman noted the importance of the programme and producing deliverable objectives within the district, including an improved depot site, a new GP surgery at Hethersett, and other investments in Market Towns. These projects would be funded through the Council's own resources, judicious borrowing, and by taking advantage of grant funding. The proposed Strategy and Programme delivered an investment in the district which totalled £97 million, as set out on pages 55 to 57 in the agenda papers. He further noted the aims of keeping the Council up-to-date, which would reduce running costs and investing for income in capital assets, as well as discretionary investments such as the Long Stratton Bypass.

The Assistant Director for Finance explained that it was good practice to set out how the Capital Programme linked in with the overall business plan, and helped meet each of the Council's aims and priorities.

The Chairman noted that in total the Council was worth around £100m, which included a significant amount brought in through Big Sky. He further noted that the Capital Programme provided an appropriate balance of risk and reward.

Discussion turned to the need for investment in the Council's depot and the ongoing investment at Diss Leisure Centre and Cllr Minshull the Local Member for Diss added that the improvements to the centre were a great investment for the Town and would enhance the services at the facility. The Chairman added that the improvements to the pool would open up wider opportunities and broaden its public health benefits. Cllr Elmer noted as Local Member for Cringleford the ongoing investment in the Country Park, which would provide significant improvements for residents.

The Assistant Director for Finance noted that the report set out how the programme would be funded through multiple sources, and there would be no requirement for any additional borrowing.

Clarification was given regarding paragraph 6.1 in the report, which detailed Capital Liability, and it was noted that it referred to the depots and leisure centres as well as the Horizon building.

The Chairman reiterated that the proposed programme was ambitious and allowed for investment in health provisions and day to day operational needs, whilst also making sure that the Council was run efficiently. It was then;

RESOLVED

1. TO RECOMMEND TO COUNCIL

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

2. 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.

Other Options Considered

None

3205. TREASURY MANAGEMENT STRATEGY STATEMENT 2024/25

Members considered the report of the Corporate Accountant, which set out the authority's approach to the management of its borrowings, investments, and cash flows.

The Chairman introduced the report and noted that the Council subscribed to a number of different industry services, which helped the Council keep in touch with the markets and counterparty risk management.

Cllr Elliott noted that there was no significant change in the Strategy from last year and it continued to adhere to the three key treasury management principles of: security, liquidity, and yield.

The Corporate Accountant added that since putting the report together, LINK, the Council's financial advisors, had confirmed that their forecast projections remained unchanged.

The Chairman further highlighted that the evidence showed that the investments were appropriate and correctly undertaken with the right level of risk while making sure the right safety measures were in place.
It was then;

RESOLVED

TO RECOMMEND TO COUNCIL

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.

Other Options Considered

None

3206. STRATEGIC PLAN 2024 - 2028 & DELIVERY PLAN 2024 - 2026

Members considered the report of the Strategic Advisor and Deputy Monitoring Officer, which sought approval and adoption of the new Strategic Plan 2024–2028 and Delivery Plan 2024–2026.

The Chairman introduced the report, noting that the Plans were set every four years, six months after the district elections, to allow all members the opportunity to help shape the plans. The Plans would reviewed after two years to ensure they were on track and allow for any adjustment to be made.

The Strategic Advisor and Deputy Monitoring Officer advised Cabinet that in the process of drafting the Strategic Plan and Delivery Plan, there had been engagement with all elected members through workshops, with early drafts taken to the Scrutiny Committee. Members were reminded that the report set out the priorities and ambitions for the Council over the next four years. Cabinet's attention was drawn to the Delivery Plan which detailed the projects, activities and key performance indicators that would measure the Council's performance. Further work with the performance indicators would be undertaken by a Task and Finish Group, which had been convened by the Scrutiny Committee.

Cllr Rowe, the Chairman of the Scrutiny Committee, confirmed that the Committee had had the opportunity to review the initial report, and the newly formed Task and Finish Group would be an important addition to the Committee's capacity.

The Chairman reiterated the amount of work that has gone into the Plans and the strong financial position the Council was in. He further explained that the budget surplus was not due to the Council not spending enough but as a result of additional income. He also noted the increased pressures on Council services, in particular social care, homelessness, and domestic abuse. The report acknowledged the day to day running of the Council and also set out how it could improve residents lives further by looking after families, growing the economy, and protecting the environment. It was then;

RESOLVED

TO RECOMMEND THAT COUNCIL approves the adoption of the Strategic Plan 2024-2028 and Delivery Plan 2024-2026.

Reasons for Decision

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

Other Options Considered

None

3207. REVIEW OF PRE-APPLICATION PLANNING FEES

Members considered the report of the Business Improvement Manager, which reviewed the charging structure for pre-application advice for planning applications following the introduction of charges in 2021.

In introducing the report Cllr Overton Neal advised the meeting that central Government had recently given permission for increases in planning fees. She noted that the provision of pre-application advice was a discretionary service, with the Council receiving approximately 680 inquiries per annum and that currently, the charge for this service, which was introduced in 2021, did not recover the full costs. The report proposed to increase the pre-application fee to reflect the national rate, which was 35 percent for major applications and 25 percent for all others. She reassured members that the Council would continue to provide initial advice to customers free of charge.

Cabinet's attention was drawn to a further proposal contained in the report, which looked at changing how the Council classed major applications. It was proposed that applications with 50 to 200 houses would be classified as major, and developments over that would be charged a bespoke fee.

In response to a question about the value of pre-application advice, the Assistant Director of Planning explained that the service helped applicants enormously, as it ensured they had advice on what they needed to submit in order for their application to be determined and provided a steer on what was likely to be acceptable in accordance with the Council's planning policies.

It was noted that following the Council's standard practice, the odd figures within appendix 3 of the report should be rounded up to the nearest £5. The Business Improvement Manager added that the report was also going through Broadland Council with the aim of aligning the service and the fees for both Councils. It was agreed that if Broadland Council was happy to follow the same approach, officers would go ahead with the proposed rounding up of the fees.

Further clarification was given regarding the projected income, where it was explained that the figures contained in the report include works on trees and listed buildings, which were categories that would continue to be provided free of charge. It was then;

RESOLVED

To agree the revised charging structure, as set out in Appendix 3, from 1 April 2024 with further consideration being given to rounding the agreed fees to the nearest five pounds.

Reasons for Decision

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

Other Options Considered

None

3208. LOCAL AUTHORITY HOUSING FUND: PURCHASE OF FURTHER PROPERTIES

Members considered the report of the People from Abroad Programme Manager, which sought pre-emptive agreement for financing and purchasing of further general-use Temporary Accommodation properties under the Government's Local Authority Housing Fund (2) (LAHF) scheme.

Cllr Minshull introduced the report, noting that the Council had faced an increase in demand for temporary accommodation due to a range of issues. Members were advised that the Government was offering the opportunity to apply for funding to add to the Council's stock of temporary accommodation to meet this increasing demand.

The Director for People and Communities advised the meeting that the Council 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.

In response to a question on how the Government funding was determined, it was confirmed that the Council's bid was based on an informal discussion in advance of the bid along with what the Council could reasonably procure before the Government's deadlines for the end of the financial year.

Cllr Brown noted the importance of temporary accommodation, along with ensuring that the quality of housing was improved, as well as the longer-term need for more housing to be built.

During discussion, Cllr Rosen added that, this was a positive measure by the Council but reiterated the need for a backup option to be put in place if the bid was unsuccessful.

It was then;

RESOLVED

That should a further allocation of LAHF be made available to the Council:

1. To agree to acquire the maximum number of TA capacity possible up to 34 units, purchased using Government and matched LAHF funding.
2. To delegate to the Director of People and Communities to accept the Government offer of additional LAHF to be used as general needs temporary accommodation.

3. Subject to recommendation 2, to agree to transfer the required amount from the TA capital budget underspend to top up the existing capital LAHF budget in order to match the Government's contribution, subject to agreement from the S151 officer and Portfolio Holder for Finance and Resources.

Reasons for Decision

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

Other Options Considered

None

3209. FORWARD PLAN

Members considered the latest version of the Council's Forward Plan.

(The meeting concluded at 10.08 am)

Chairman

Agenda Item 5



Cabinet
18 March 2024

Adoption of the Greater Norwich Local Plan

Report Author: Mike Burrell
Greater Norwich Planning Policy Manager
01603 222761
mike.burrell@norfolk.gov.uk

Portfolios: Cllr John Fuller; and Cllr Lisa Overton-Neal
External Affairs & Policy; and Stronger, Greener Economy

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 South Norfolk.

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

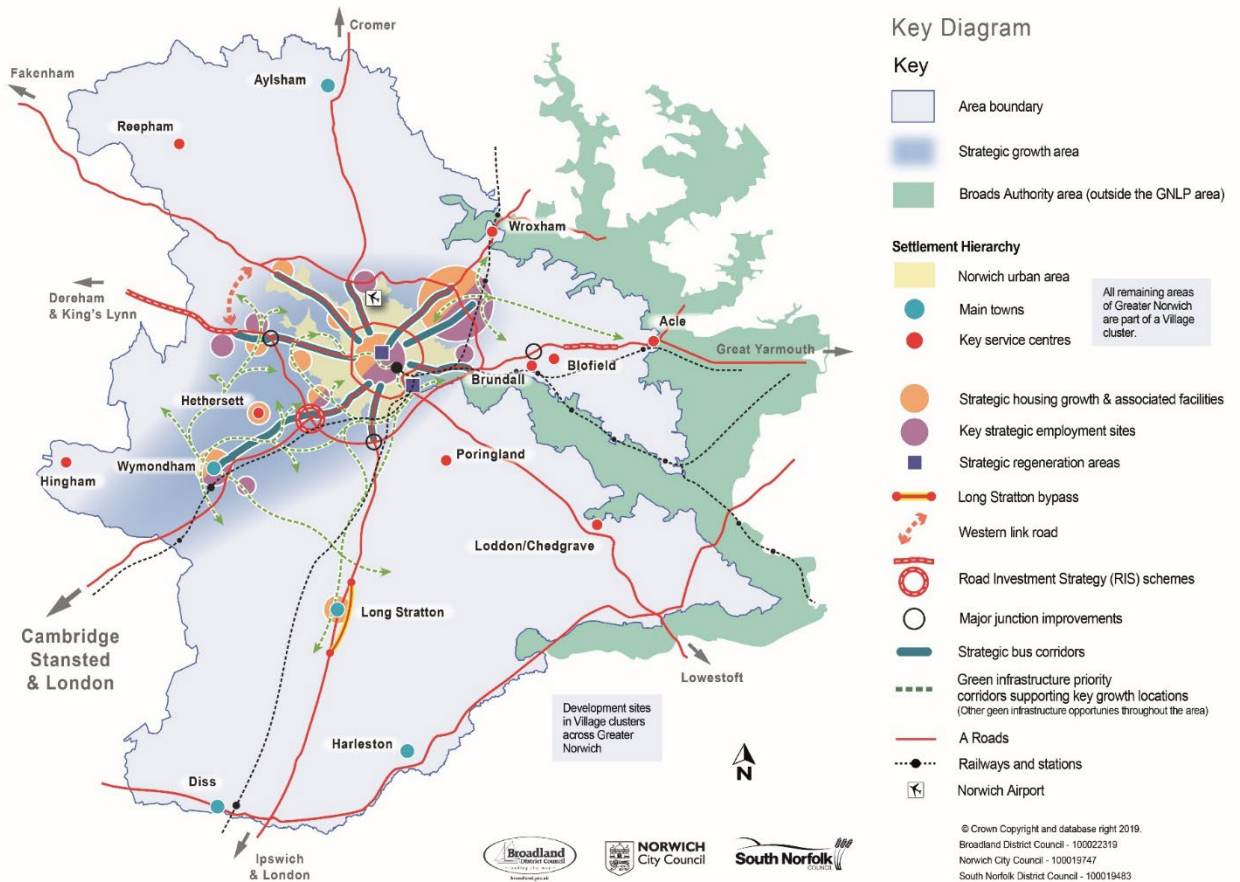
through detailed community and stakeholder consultation. Its development has taken account of a broad range of issues and views. It is well-evidenced, meets the plan's objectives and has now been endorsed by the government appointed inspectors through its examination.

- 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 Broadland and Norwich 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 South Norfolk.

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.



Cabinet
18/03/2024

Tasburgh Neighbourhood Plan – Consideration of Examiner’s Report

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Purpose of the Report:

South Norfolk Council has received the independent examiner’s report in relation to the Tasburgh Neighbourhood Plan. The examiner suggests several recommended modifications to the Neighbourhood Plan and concludes that, subject to these modifications, it should proceed to referendum. South Norfolk Council should now decide whether it is satisfied with these recommendations.

Recommendations:

1. Cabinet to approve each of the recommended modifications to the Tasburgh Neighbourhood Plan, as detailed within the examiner’s report, and publish a Decision Statement setting out the Council’s response and announcing the intention for the Neighbourhood Plan to proceed to a referendum.

1. Summary

- 1.1 South Norfolk Council has now received the report of the independent examiner appointed to inspect the submitted Tasburgh Neighbourhood Plan (see Appendix 1). In accordance with paragraph 12 of Schedule 4B of the Town & Country Planning Act 1990, South Norfolk Council should now decide on what action to take in respect of each of the examiner's recommendations.
- 1.2 The examiner has recommended fifteen modifications to the Neighbourhood Plan in order to ensure it meets the Basic Conditions of neighbourhood planning. On the basis that these modifications are made, the examiner is satisfied that the Plan should proceed to a referendum.

2. Background

- 2.1 The submitted Tasburgh Neighbourhood Plan (which can be viewed [here](#)) was approved by South Norfolk Council on 9th October 2023. This was followed by a statutory six week publication period in which the Plan and its supporting documents were made available for inspection and subject to representations from the public and stakeholder bodies. This was in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.
- 2.2 During the six week publication period, which took place between 18th October and 29th November 2023, a total of twenty-nine representations were received from fourteen different organisations/individuals (click [here](#) for details of responses). These representations were submitted, along with the Neighbourhood Plan and supporting information, to the independent examiner, Mr Andrew Ashcroft, the appointment of whom was confirmed by South Norfolk Council in November 2023.
- 2.3 The examination was conducted via written representations during December 2023/January 2024 (the examiner deciding that a public hearing would not be required).

3. Current position/findings

- 3.1 The recommended modifications are set out in the examiner's report (see Appendix 1). It is worth noting that the report includes a subsequent addendum on page 2, which relates to a further recommended modification to Policy TAS9 within the Neighbourhood Plan.
- 3.2 For ease of reference, all of the examiner's recommendations and the proposed responses from South Norfolk Council are set out in the Decision Statement, comprising Appendix 3 to this report.
- 3.3 Each of the recommendations involves modifying the wording of policies/ supporting text within the Neighbourhood Plan, in order to bring the document in line with the Basic Conditions of neighbourhood planning, as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.

- 3.4 During the Regulation 16 publication stage, South Norfolk Council submitted eleven representations relating to different elements of the submitted Plan. These representations, the examiners recommendations relating to the respective elements of the Neighbourhood Plan, and some subsequent commentary from Council officers for the purposes of this report, are available to view within Appendix 2.
- 3.5 The examiner has made recommendations that address each of the Council's representations on Neighbourhood Plan policies.
- 3.6 Having reviewed the examiner's report, officers consider that the recommendations substantially address the concerns raised by the Council and are well reasoned. Therefore it is not considered that there is any clear need for the Council to take a different view to that of the examiner and officers are content with the recommended modifications.

4. Proposed action

- 4.1 It is proposed that South Norfolk Council approves each of the examiner's recommended modifications, as detailed in his report, and authorises the Neighbourhood Plan to proceed to a referendum within the neighbourhood area.
- 4.2 Following this decision, officers will publish the Council's Decision Statement on its website and notify Tasburgh Parish Council and those individuals and organisations which responded at the Regulation 16 publication stage.
- 4.3 This will fulfil South Norfolk Council's obligations in terms of paragraph 12 of Schedule 4B of the Town & Country Planning Act 1990.

5. Other options

- 5.1 South Norfolk Council could decide not to approve either one of the examiner's recommendations, should it wish, and make alternative proposals.
- 5.2 However, should the local planning authority propose to make a decision that differs from any of the examiner's recommendations (and the reason for the difference is wholly or partly as a result of new evidence or a new fact or a different view taken by the authorities about a particular fact) then the local authority:
- (a) is required to notify all those identified in the Neighbourhood Plan consultation statement about this position and invite representations over a six week period;
 - (b) may refer the issue to an independent examination if it is considered appropriate.
- 5.3 Officers do not consider that any of the examiner's recommended modifications would prevent the Neighbourhood Plan from meeting the Basic Conditions set out in paragraph 8 of Schedule 4B of the 1990 Act.

6. Issues and risks

- 6.1 **Resource Implications** – Officers will be required to publish the Decision Statement online and send a copy to the Parish Council and previous consultees.
- 6.2 The preparation for and holding of the local referendum will demand a significant amount of officer time, particularly from within the Electoral Services team and, to a lesser extent, the Place Shaping team. This will be met from the existing staff resource.
- 6.3 The Council is required to pay for the referendum and this will be met from within the existing budget. The average cost of a Neighbourhood Plan referendum is approximately £4,500. It is worth noting that, to date, the Council has been able to claim £20,000 from DLUHC for each Neighbourhood Plan that has been approved to proceed to a referendum. However, DLUHC has yet to confirm that funding will be available for 2024/25.
- 6.4 **Legal Implications** – The procedures highlighted within this report follow legislation set out in the Neighbourhood Planning (General) Regulations 2012 (as amended) and Schedule 4B of the Town & Country Planning Act 1990.
- 6.5 **Equality Implications** – An Equalities Impact Assessment has been completed on the submitted Neighbourhood Plan.
- 6.6 **Environmental Impact** – Habitats Regulation Assessment and Strategic Environmental Assessment Screening Reports have been produced for the Plan and agreed with the Environment Agency, Historic England and Natural England.
- 6.7 **Crime and Disorder** – The Plan is not likely to have any impacts on crime and disorder, nor is it likely to have any impacts on disadvantaged groups.
- 6.8 **Risks** – No other particular risks associated with the Neighbourhood Plan are identified.

7. Conclusion

- 7.1 In accordance with the conclusions of the independent examiner, it is proposed that Cabinet agrees to make the recommended modifications to the Tasburgh Neighbourhood Plan and to approve it for a referendum within the neighbourhood area.

8. Recommendations

- 8.1 Cabinet to approve each of the recommended modifications to the Tasburgh Neighbourhood Plan, as detailed within the examiner's report, and publish a Decision Statement setting out the Council's response and announcing the intention for the Neighbourhood Plan to proceed to a referendum.

Background papers

[Tasburgh Neighbourhood Plan – Submission Version](#)

[Tasburgh NP Regulation 16 Consultation Responses](#)

Appendix 1: Tasburgh Neighbourhood Plan Independent Examiner’s Report

Appendix 2: South Norfolk Council Reg. 16 representations and examiner responses

Appendix 3: Tasburgh Neighbourhood Plan – Proposed Decision Statement

Tasburgh Neighbourhood Development Plan 2023-2038

**A report to South Norfolk Council on the
Tasburgh Neighbourhood Development Plan**

**Andrew Ashcroft
Independent Examiner
BA (Hons) MA, DMS, MRTPI**

Director – Andrew Ashcroft Planning Limited

Tasburgh Neighbourhood Development Plan

Revision to Examiner's Report

Context

This Note sets out a detailed revision to my report on the submitted Plan.

Revision

In Policy TAS9 delete the final paragraph (which refers to the Design Guidance and Codes).

This revision will ensure that Policy TAS9 is consistent with the recommended modifications for the other parts of the Plan.

Other comments

Otherwise, my report of 5 February 2024 is unaffected.

Andrew Ashcroft

Independent Examiner

Tasburgh Neighbourhood Development Plan

1 March 2024

Executive Summary

- 1 I was appointed by South Norfolk Council in November 2023 to carry out the independent examination of the Tasburgh Neighbourhood Plan.
- 2 The examination was undertaken by way of written representations. I visited the neighbourhood area on 19 December 2023.
- 3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. There is a very clear focus on two matters. The first is the proposed designation of a series of Local Green Spaces. The second is ensuring high standards of design. The Plan has been prepared in short order.
- 4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.
- 5 Subject to a series of recommended modifications set out in this report, I have concluded that the Plan meets all the necessary legal requirements and should proceed to referendum.
- 6 I recommend that the referendum should be held within the neighbourhood area.

Andrew Ashcroft
Independent Examiner
5 February 2024

1 Introduction

- 1.1 This report sets out the findings of the independent examination of the Tasburgh Neighbourhood Development Plan 2023-2038 ('the Plan').
- 1.2 The Plan was submitted to South Norfolk Council (SNC) by Tasburgh Parish Council (TPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.
- 1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF) in 2012, 2018, 2019, 2021 and 2023. The NPPF continues to be the principal element of national planning policy.
- 1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises as from my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.
- 1.5 A neighbourhood plan can be narrow or broad in scope and can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The submitted Plan has been designed to be distinctive in general terms, and to be complementary to the existing development plan. It seeks to provide a context in which the neighbourhood area can maintain its character and appearance and that new development is designed in a positive way.
- 1.6 Within the context set out above, this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.
- 1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then become part of the wider development plan and be used to determine planning applications in the neighbourhood area.

2 The Role of the Independent Examiner

- 2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.
- 2.2 I was appointed by SNC, with the consent of TPC, to conduct the examination of the Plan and to prepare this report. I am independent of SNC and TPC. I do not have any interest in any land that may be affected by the Plan.
- 2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have over 40 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I am a chartered town planner and have significant experience of undertaking other neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

Examination Outcomes

- 2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:
- (a) that the Plan as submitted should proceed to a referendum; or
 - (b) that the Plan should proceed to referendum as modified (based on my recommendations); or
 - (c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.
- 2.5 The outcome of the examination is set out in Section 8 of this report.

Other examination matters

- 2.6 In examining the Plan, I am required to check whether:
- the policies relate to the development and use of land for a designated neighbourhood plan area; and
 - the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
 - the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.
- 2.7 I have addressed the matters identified in paragraph 2.6 of this report and am satisfied that they have been met.

3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the TPC SEA screening report.
- the SNC HRA screening report
- the representations made to the Plan.
- TPC's responses to the clarification note.
- the adopted Joint Core Strategy (JCS) for the Greater Norwich Area (Broadland, Norwich, and South Norfolk).
- the Site Specific Allocations and Policies Document (SSAPD).
- the Development Management Policies Document (DMPD).
- the emerging Greater Norwich Local Plan (GNLP).
- the emerging Village Clusters Housing Allocations Plan (VCHAP).
- the National Planning Policy Framework (December 2023).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 I visited the neighbourhood area on 19 December 2023. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular.

3.3 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted plan, I concluded that the Plan could be examined by way of written representations.

3.4 The Basic Conditions Statement comments about the relationship of the Plan with the 2021 version of the NPPF. The NPPF was updated in both September and December 2023 after the Plan had been submitted. Plainly these updates were beyond the control of TPC. For clarity, I have assessed the Plan against the December 2023 version of the NPPF.

4 Consultation

Consultation Process

- 4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.
- 4.2 In accordance with the Neighbourhood Planning (General) (Amendment) Regulations 2012, TPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and its policies. It is commendably brief with more details included in six appendices. In the round it is a very good example of a Statement of this type.
- 4.3 The Statement records the various activities that were held to engage the local community and the feedback from each event. They are based around three key stages (which are supported by separate appendices). Key elements of the communications strategy were:
- the use of the Neighbourhood Plan pages on the TPC website for regular updates and information about future events;
 - posters displayed around the parish;
 - articles in the Tasburgh Quarterly & Church News (parish magazine); and
 - the use of Facebook.
- 4.4 The Statement also provides specific details on the consultation processes that took place on the pre-submission version of the Plan (March to May 2021). Appendix 6(d) lists the comments received and advises about the way the Plan was refined because of this process. It helps to explain the evolution of the Plan.
- 4.5 I am satisfied that consultation has been an important element of the Plan's production. Advice on the neighbourhood planning process has been made available to the community in a positive and direct way by those responsible for the Plan's preparation. From all the evidence provided to me as part of the examination, I can see that the Plan has promoted an inclusive approach to seeking the opinions of all concerned throughout the process. SNC has carried out its own assessment that the consultation process has complied with the requirements of the Regulations.

Consultation Responses

- 4.6 Consultation on the submitted plan was undertaken by SNC. This exercise generated representations from the following organisations:
- National Highways
 - Sport England
 - Norfolk Historic Environmental Record
 - Historic England
 - Natural England

- Norfolk Constabulary
- Norfolk Wildlife Trust
- Environment Agency
- Anglian Water
- Norfolk County Council
- South Norfolk Council

4.7 Comments were also received from several residents. I have taken account of all the representations in preparing this report. Where it is appropriate to do so, I refer to specific representations on a policy-by-policy basis.

5 The Neighbourhood Area and the Development Plan Context

The Neighbourhood Area

- 5.1 The neighbourhood area is the parish of Tasburgh. Its population in 2011 was 1149 persons living in 463 households. It is situated approximately ten miles south of Norwich. It was designated as a neighbourhood area in May 2020.
- 5.2 There are two main areas of settlement in the parish - Upper and Lower Tasburgh. Upper Tasburgh has developed as a nucleated settlement because of post-war estate development and lies above the Tas Valley which runs to the south and west. St Mary's Church lies at the western end of Upper Tasburgh on slightly higher ground. Lower Tasburgh is set in the Tas Valley and comprises ribbon development strung along part of Grove Lane and Low Road. Other than a small estate at Harvey Close, the character of Lower Tasburgh comprises single plot depth development of varying age with significant trees and hedges interspersed with important gaps that give it an attractive rural character.
- 5.3 The character and appearance of the neighbourhood area is heavily affected by the River Tas. Two of its tributaries converge at Tasburgh. In addition, there are several commercial uses along the A140 (Norwich to Ipswich Road).

Development Plan Context

- 5.4 The development plan for the neighbourhood area is both comprehensive and emerging. The Joint Core Strategy (JCS) for the Greater Norwich Area (Broadland, Norwich, and South Norfolk) was adopted in 2014. Tasburgh is one of a series of defined Service Villages in the Plan. The following policies in the JCS are particularly relevant to the submitted Plan:
- Policy 1: Addressing climate change and protecting environmental assets;
 - Policy 2: Promoting good design;
 - Policy 15: Service Villages; and
 - Policy 17: Smaller rural communities and the countryside.
- 5.5 The Site Specific Allocations and Policies Document (SSAPD) is part of the South Norfolk Local Plan. It supplements the JCS and designates areas of land to deliver housing, employment, recreation, open spaces, and community uses. Policy TAS1 allocates 1.14 hectares of land to the north of Church Road for residential development (approximately 20 homes).
- 5.6 In addition, SNC adopted a Development Management Policies Document (DMPD) in 2015. Important policies in that Document as they refer to the parish include:
- Policy DM2.2 Working from Home;
 - Policy DM3.2 Meeting rural housing needs;
 - Policy DM3.4 Residential extensions and conversions within settlements;
 - Policy DM3.13 Amenity, noise, and quality of life; and
 - Policy DM3.16 Improving the level of local community facilities.

5.7 In this broader context of the development plan the Plan's policies have been assessed for their conformity against the development plan in the following sections of the Basic Conditions Statement:

- the Greater Norwich Joint Core Strategy 2014 (Column C),
- the South Norfolk Development Management Policies 2015 (Column D),
- the South Norfolk Site-Specific Allocations and Policies Document (Column E).

This is best practice. It reflects the comprehensive nature of the development plan

5.8 The JCS will eventually be replaced by the emerging Greater Norwich Local Plan (GNLP). The GNLP is now well advanced. Consultation on Main Modifications to the Plan ended in December 2023. In this context the Statement includes a separate table which assesses the policies in the submitted Plan for their conformity against the emerging GNLP.

5.9 The emerging Village Clusters Housing Allocations Plan (VCHAP) will supplement the GNLP. It is also well-advanced. Consultation on the pre-submission draft plan ended in March 2023. Consultation is currently taking place on alternative sites and focused changes to the Plan. The VCHAP proposes the allocation of land at Church Road Tasburgh for housing development (Policy VCTAS1).

5.10 On the one hand, the development plan context for the neighbourhood area is complex. On the other hand, TPC has carefully produced a Plan which seeks to complement the existing and emerging development plans. In addition, the submitted Plan has relied on up-to-date information and research that has underpinned existing planning policy documents. This is good practice and reflects key elements in Planning Practice Guidance on this matter.

Visit to the neighbourhood area

5.11 I visited the neighbourhood area on 19 December 2023. I approached from Norwich to the north on the A140. This helped me to understand its position in general and its accessibility to the strategic road network.

5.12 I saw the importance of the various businesses along the A140 and as referenced in several of the policies in the Plan.

5.13 I looked initially at the proposed housing allocation at land to the north of Church Road (and as addressed in Policy TAS9 of the Plan). I saw the importance of the School and the way in which it secured access off Henry Preston Road. I also looked at the proposed housing site from Grove Lane to the west.

5.14 I then looked at St Mary's Church and the Hillfort. I saw their strategic positions on higher ground in the parish.

5.15 I then looked at the Village Hall and the various associated recreational facilities. It was clear that it was at the heart of the parish (in both geographical and community terms).

- 5.16 I continued along Grove Lane to Lower Tasburgh. In doing so, I saw the importance of River Tas within the parish. I saw that its character was very different to that of Upper Tasburgh and was based on single plot developments along both Low Road and Saxlingham Lane.
- 5.17 I spent time looking at Burrfield Park. It is an excellent example of a local green space and complemented the tranquillity of this part of the parish.

6 The Neighbourhood Plan and the Basic Conditions

- 6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The submitted Basic Conditions Statement has helped in the preparation of this section of the report. It is an informative and well-presented document.
- 6.2 As part of this process, I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:
- have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - contribute to the achievement of sustainable development;
 - be in general conformity with the strategic policies of the development plan in the area;
 - be compatible with European Union (EU) obligations and European Convention on Human Rights (ECHR); and
 - not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

I assess the Plan against the basic conditions under the following headings.

National Planning Policies and Guidance

- 6.3 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework 2023 (NPPF).
- 6.4 The NPPF sets out a range of land-use planning principles to underpin both plan-making and decision-taking. The following are particularly relevant to the Tasburgh Neighbourhood Development Plan:
- a plan-led system - in this case the relationship between the neighbourhood plan and the JCS, the SSAPD and the DMPD.
 - building a strong, competitive economy;
 - recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;
 - taking account of the different roles and characters of different areas;
 - highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
 - conserving heritage assets in a manner appropriate to their significance.
- 6.5 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

- 6.6 In addition to the NPPF I have also taken account of other elements of national planning policy including Planning Practice Guidance and the recent ministerial statements.
- 6.7 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance subject to the recommended modifications in this report. It sets out a positive vision for the future of the neighbourhood area. It includes a series of policies on a range of development and environmental matters. It has a focus on designating local green spaces and ensuring that new development is designed in a positive way.
- 6.8 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This was reinforced with the publication of Planning Practice Guidance. Paragraph ID: 41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.
- 6.9 As submitted the Plan does not fully accord with this range of practical issues. Most of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

Contributing to sustainable development

- 6.10 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. The submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes a policy for business development (Policy TAS10). In the social role, it includes policies on housing mix (Policy TAS8), and on the village hall site (Policy TAS14). In the environmental dimension, the Plan positively seeks to protect its natural, built, and historic environment. It has policies on design (Policy TAS6) and on heritage assets (Policy TAS11). This assessment overlaps with the details on this matter in the submitted Basic Conditions Statement.

General conformity with the strategic policies in the development plan

- 6.11 I have already commented in detail on the development plan context in South Norfolk in paragraphs 5.4 to 5.10 of this report.
- 6.12 I consider that the submitted Plan delivers a local dimension to this strategic context and supplements the detail already included in the adopted development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development plan.

Strategic Environmental Assessment

- 6.13 The Neighbourhood Plan (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.
- 6.14 In order to comply with this requirement, TPC undertook a screening exercise in March 2023 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It concludes that the Plan is unlikely to have a significant effect on the environment and therefore does not require a Strategic Environment Assessment.

Habitats Regulations Assessment

- 6.15 SNC prepared a Habitats Regulations Assessment (HRA) of the Plan in February 2023. There are no protected sites in the parish the report. Nevertheless, the HRA assesses the potential impact of the Plan's policies on the Norfolk Valley Fen SAC. The report is thorough and comprehensive.
- 6.16 The HRA concludes that the neighbourhood plan will not give rise to likely significant effects on these protected sites, either alone or in combination with other plans or projects, and that Appropriate Assessment is not required.
- 6.17 Having reviewed the information provided to me as part of the examination, I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. None of the statutory consultees have raised any concerns about these matters. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

Human Rights

- 6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. There has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. On this basis, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

Summary

- 6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

7 The Neighbourhood Plan policies

- 7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.
- 7.2 The recommendations focus on the policies in the Plan given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.
- 7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the Plan area. The wider community and TPC have spent time and energy in identifying the issues and objectives that they wish to be included in their Plan. This sits at the heart of the localism agenda.
- 7.4 The Plan has been designed to respond to Planning Practice Guidance (ID:41-004-20190509) which indicates that neighbourhood plans should address the development and use of land. It also includes a series of non-land use community action projects in Section 11 of the Plan.
- 7.5 I have addressed the policies in the order that they appear in the submitted Plan.
- 7.6 For clarity, this section of the report comments on all the Plan's policies.
- 7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

The initial parts of the Plan (Sections 1 to 5)

- 7.8 The Plan is well-organised and presented. It has been prepared with much attention to detail and local pride. It makes an appropriate distinction between the policies and their supporting text.
- 7.9 The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies. The Introduction sets the scene for the Plan. It properly identifies the Plan period.
- 7.10 Section 2 provides information about the parish. It identifies the neighbourhood area and provides interesting and comprehensive details which help to set the scene for the eventual policies. It also provides information about the development plan in South Norfolk.
- 7.11 Section 3 comments about the way in which the Plan was prepared. The breakdown of events overlaps with the details in the Consultation Statement. It is presented in an attractive and easily-understood format.
- 7.12 Section 4 sets out the Vision for the parish as follows:

'Tasburgh will continue to be a safe, cohesive, community orientated village with accessible and well-used village amenities. It will be well connected for pedestrians

and cyclists. Any development will reflect current and future housing needs and be environmentally sustainable. Our local heritage assets will be recognised, and designated greenspaces will be protected.'

- 7.13 Section 4 also sets out a series of Objectives. They form the basis for the way in which the policies are structured. This is best practice.
- 7.14 Section 5 sets out the format of the remainder of the document. In addition, it introduces The Tasburgh Design Guidance and Codes and the community action projects as set described in Chapter 11 of the Plan.
- 7.15 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

TAS1: Natural Assets

- 7.16 The policy takes a comprehensive approach to natural assets. It identifies a series of such assets in the parish.
- 7.17 The policy itself has two main parts. The first is that where loss or damage of an asset is unavoidable, the development concerned shall provide for appropriate replacement planting or appropriate natural features on site together with a method statement for the ongoing care and maintenance of that planting. The second is that all development proposals should retain existing features of biodiversity value (including hedgerow and field margins, trees, veteran trees, grass verges, ancient grasslands, ponds, and drainage ditches). This part of the policy also advises that development proposals should identify how they will provide a minimum 10 percent net gain in biodiversity.
- 7.18 In general the policy takes a positive approach to the natural assets in the parish. It has regard to Section 15 of the NPPF. However, within this broader context, I recommend the following package of recommended modifications to bring the clarity required by the NPPF and to allow SNC to be able to apply its contents in a clear and consistent fashion:
- the repositioning of the commentary about Local Green Spaces (Policy TAS2) into the supporting text;
 - the incorporation of the potential for mitigation/compensation measures into the Loss of Natural Assets section; and
 - the introduction of a proportionate element into the 'Enhancing Biodiversity' section to acknowledge that different proposals will have different impacts on the policy.
- 7.19 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Delete 'In addition to the Local Green Spaces (policy TAS2)'

Replace the Loss of Natural Asset section with: 'Where loss or damage is unavoidable, the development shall provide for appropriate replacement planting or appropriate natural features on site together with a method statement

for the ongoing care and maintenance of that planting. Where this approach is not practicable, appropriate off-site mitigation/compensation should be incorporated into the development proposal. In either case, a method statement for the ongoing care and maintenance of the planting should be included in the proposal.'

In the 'Enhancing Biodiversity' section replace 'All development proposals' with 'As appropriate to their scale, nature and location, development proposals'

At the end of paragraph 6.3 add: 'Policy TAS1 Addresses natural assets. Policy TAS2 addresses local green spaces. Other policies in this part of the Plan comment about important views, climate change and dark skies.'

TAS2: Local Green Spaces

- 7.20 This policy proposes the designation of six local green spaces (LGSs). The approach taken is underpinned by the comprehensive details in Appendix C. The proposed LGSs vary from incidental green spaces in Upper Tasburgh to the attractive Burrfield Park in Lower Tasburgh to the Playing Fields by the Village Hall.
- 7.21 I looked at the proposed LGS carefully during the visit. Based on all the information available to me, including my own observations, I am satisfied that the proposed LGSs comfortably comply with the three tests in paragraph 106 of the NPPF. Burrfield Park (LGS3) and the Playing Fields (LGS1) are precisely the types of green spaces which the authors of the NPPF would have had in mind in preparing national policy on this important matter.
- 7.22 In addition, I am satisfied that their proposed designation would accord with the more general elements of paragraph 105 of the NPPF. Firstly, I am satisfied that the designations are consistent with the local planning of sustainable development. They do not otherwise prevent sustainable development coming forward in the neighbourhood area and no such development has been promoted or suggested. Secondly, I am satisfied that the LGSs are capable of enduring beyond the end of the Plan period. They are an established element of the local environment and have existed in their current format for many years. In addition, no evidence was brought forward during the examination that would suggest that the proposed LGSs would not endure beyond the end of the Plan period.
- 7.23 The policy follows the matter-of-fact approach in paragraph 107 of the NPPF. As such I am satisfied that it meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

TAS3: Important Local Views

- 7.24 The policy identifies ten important local views. The details of the views are set out in paragraph 6.27 of the Plan. I looked at a selection of the views during the visit. In general terms they relate to the interface between Upper and Lower Tasburgh and the surrounding countryside. I am satisfied that the views have been carefully selected.

- 7.25 The policy has two parts. The first relates to wider landscape setting and the second relates to the important local views. The latter comments that development proposals within or affecting an important local view must demonstrate how they have taken account of the view concerned.
- 7.26 In the round I am satisfied that the policy takes a positive approach to this matter. It has regard to Section 15 of the NPPF. However, within this broader context, I recommend the following package of recommended modifications to bring the clarity required by the NPPF:
- the use of wording more appropriate to a neighbourhood plan; and
 - a remodelling of the second part of the policy so that it will be able to be applied consistently by SNC through the development management process.

- 7.27 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In the opening part of the policy replace ‘must’ with ‘should’

Replace the final part of the policy with: ‘Development proposals within or affecting an important local view should demonstrate how they have responded positively to the view concerned and safeguarded its integrity and local importance.’

TAS4: Climate change, flood risk and surface water drainage issues

- 7.28 This is a comprehensive policy based on detailed evidence and flood profile issues. I saw the importance of the River Tas during the visit.
- 7.29 The policy comments that all development will be expected to demonstrate how it can mitigate its own flooding and drainage impacts, avoid an increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates for flooding. It also advises that proposals for new development should take account of the advice and guidance on surface water drainage and the mitigation of flood risk obtainable from Norfolk County Council (as Lead Local Flood Authority) and the relevant Internal Drainage Board (as statutory Drainage Board for the Plan area). It also comments that large development should include Sustainable Urban Drainage Systems. It also makes specific comments about land on Low Road.
- 7.30 In general terms the policy takes a positive approach to this important matter. I saw during the visit that built development in the parish has a sensitive relationship with the River Tas. In addition, the policy has regard to Section 14 of the NPPF. However, within this overall context I recommend the following package of modifications to bring the clarity required by the NPPF:
- the introduction of a proportionate element into the policy to acknowledge that individual proposals will have different impacts (if any) on surface water drainage issues and flooding;
 - a restructuring of the policy to ensure that the proportionate element can be applied throughout its various elements;

- the definition of major/larger developments in the supporting text;
- the relocation of the detailed element of the policy about land around Low Road into the supporting text. This acknowledges that it highlights a specific part of the parish to which the policy would have a particular significance rather than being a land use policy.

7.31 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the policy with:

‘As appropriate to their scale, nature and location development proposals should:

- **demonstrate how they can mitigate their own flooding and drainage impacts, avoid an increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates for flooding (see figure 20 flood risk);**
- **respond positively to the advice and guidance on surface water drainage and the mitigation of flood risk obtainable from Norfolk County Council (as Lead Local Flood Authority) and the relevant Internal Drainage Board (as statutory Drainage Board for the Plan area); and**
- **where appropriate, mitigate and adapt to climate change.**

Proposals for major development should include sustainable drainage systems unless it is impracticable to do so.’

In paragraph 6.29 replace ‘This is identified in policy TAS4’ with ‘This part of the parish is particularly important for the application of Policy TAS4.’

At the end of paragraph 6.31 add: ‘Policy TAS4 has a proportionate element to acknowledge that individual proposals will have different impacts (if any) on surface water drainage issues and flooding. The policy has a specific requirement for major developments. For clarity a major development is that as defined by the Town & Country Planning Development Management Procedure Order (2015).’

TAS5: Dark skies

7.32 This policy seeks to safeguard the dark skies in the parish. It comments that development proposals must take account of existing dark skies and seek to limit the impact of light pollution from artificial light. It also advises that street lighting will not be permitted on any development, unless there is a clear and compelling need to do so, for example highway safety on A140. In relation to individual dwellings the policy comments that any lighting necessary for security or safety should be designed to minimise the impact on dark skies by, for example, minimal light spillage, use of downlighting, movement sensitive lighting and restricting hours of lighting. Finally, it advises that lighting likely to cause disturbance or risk to wildlife should not be permitted.

7.33 In general terms the policy takes a positive approach to this matter. I recommend modifications to the wording used to ensure that they are more appropriate to a

neighbourhood plan and take a non-prescriptive approach. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In the first part of the policy replace ‘must’ with ‘should’ and ‘permitted’ with ‘supported’

In the second part of the policy replace ‘permitted’ with ‘supported’

TAS6: Design guidelines and codes

- 7.34 This is an important policy within the overall context of the Plan. It advises that the design of all new development in Tasburgh should reflect the parish’s local distinctiveness and character. It also comments that proposals for new development should accord with the parish-wide principles laid out in the Tasburgh Design Guidelines and Codes. In addition, it sets out specific codes for the three identified character areas.
- 7.35 In the round the policy takes a very positive approach to design. The combination of the policy and the Design Guidelines and Codes represents an excellent local response to Section 12 of the NPPF. However, in this positive context I recommend that the second part of the policy is modified so that it can be applied in a proportionate way by SNC through the development management process. This acknowledges that individual proposals will have different impacts (if any) on the principles in the Design Guidelines and Codes.
- 7.36 SNC comments that it would be more appropriate for the allocated housing site in the SSAPD, and as proposed to be allocated in the emerging VCHAP, to be shown within the Upper Tasburgh Character Area rather than the Transition Area (between Upper and Lower Tasburgh). Based on all the available evidence, including my visit to the parish and TPC’s response to the clarification note, I recommend that the boundary between the Upper Tasburgh Character Area and the Transition Area in the Design Guidelines and Codes is revised so that the proposed housing allocation is within the Upper Tasburgh Character Area. I have reached this conclusion based principally on the way in which the proposed housing allocation relates to the character and appearance of Upper Tasburgh and physical and natural features in this part of the parish.
- 7.37 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In the second part of the policy replace ‘Proposals for new development should accord with the parish-wide principles laid out’ with ‘As appropriate to their scale, nature and location, proposals for new development should accord with the parish-wide principles set out’

In the Design Guidance and Codes include the parcels of land as proposed to be allocated for housing development in the emerging VCHAP within the Upper Tasburgh Character Area rather than the Transition Area (between Upper and Lower Tasburgh).

TAS7: Housing location, pattern, and scale

- 7.38 This is an important policy in the Plan. It comments that new residential development should be focused in Upper Tasburgh, where it can best integrate with existing development, taking advantage of the proximity to existing community infrastructure, public transport on A140 and safe pedestrian and cycle routes. It also advises that proposals for all new development should enhance the form and character of the village and be physically connected to the existing built-up area.
- 7.39 The policy also includes specific sections on Infill development and the Gap between Upper Tasburgh and Lower Tasburgh.
- 7.40 In general the policy takes a positive approach to this matter. It will help to ensure that new development is in a sustainable location close to existing community facilities.
- 7.41 SNC makes specific comments about the section of the policy on the gap between the two settlements. I have taken account of these comments and TPC's response to the clarification note. On the balance of the evidence, I am satisfied that the policy wording is appropriate. Its opening element is positively-worded. This positive approach is then supplemented by a negative approach for proposals which do not follow the advice in the initial part of the policy. I do however recommend that a clearer and more precise map, setting out the precise boundary of the gap between the two areas, is included within the Plan either in addition to figure 4 or within the context of figure 4.
- 7.42 Elements of the policy comment that (as appropriate to their details) development will 'only' be supported where criteria are met. This presents a somewhat negative approach. In its response to the clarification note, TPC advised that:
- 'We have a concern about how the policy may be interpreted without the word 'only', with a risk that an application is determined based on one policy and not considering other policies'*
- 7.43 I have considered this matter carefully. On the balance of the evidence, I recommend the deletion of the uses of 'only'. Whilst I note the concerns of TPC, the development plan should be read as a whole. In any event, the policy itself is sufficiently robust on its environmental expectations.
- 7.44 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In the 'Location of New Housing' and 'Infill and Windfall Development' sections of the policy delete 'only'

Include a clearer and more precise map, setting out the precise boundary of the gap between Upper and Lower Tasburgh in the Plan either in addition to figure 4 or within the context of figure 4.

TAS8: Housing mix

- 7.45 This is a wide-ranging policy on housing mix. It is underpinned by comprehensive evidence including the Tasburgh Housing Market Assessment. It has four related elements as follows:
- major residential development proposals (10 or more homes or a site with an area of 0.5 hectares or more) should provide for a housing mix (size, type, and tenure) that meets housing needs, with a view to enabling a mixed community;
 - major residential development proposals should provide a well-balanced mix of housing sizes;
 - a greater proportion of Affordable Housing is required in Tasburgh above the minimum required by the Local Plan; and
 - proposals for specialist housing are encouraged, particularly for older people.
- 7.46 In general terms the policy takes a positive approach to these matters. In this broader context I recommend the following package of modifications to the policy to bring the clarity required by the NPPF. In addition, they acknowledge that some of its elements may not be either practicable and/or viable on all development sites in general, or the development of the site to the north of Church Road (as allocated in the SSAPD and as proposed to be allocated in the emerging VCHAP):
- replace the first sentence of the 'Affordable Housing' section to incorporate technical revisions proposed by SNC;
 - to ensure that the approach towards the size and type of properties has regard to practical and viability considerations; and
 - to recast the approach taken in the Specialist Housing section of the policy so that it has the clarity required by the NPPF.
- 7.47 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development. In addition, it will help to deliver new housing which responds positively to the needs of local people and complement the work of other agencies on this important matter.

Replace the first sentence of the 'Affordable Housing' section with: 'In line with the findings of the Tasburgh Housing Needs Assessment, opportunities should be taken to maximise the delivery of affordable housing, where appropriate, above the minimum required by the Local Plan.'

In the second sentence of the 'Affordable Housing' section replace 'Major residential development proposals' with 'Where it is both practicable and viable to do so, major residential development proposals'

Replace the 'Specialist Housing' section of the policy with: 'Proposals for specialist housing, particularly for older people, will be supported. Wherever practicable new homes should be built to the adopted accessible and adaptable dwellings standards.'

TAS9: Land north of Church Road and west of Tasburgh School

- 7.48 The policy addresses the land to the north of Church Road and to the west of the School. It is an allocated housing site in the adopted SSAPD and in the emerging VCHAP. I looked at the proposed site, the School, and Henry Preston Road carefully during the visit.
- 7.49 The policy comments that in addition to the requirements of the (emerging) VCHAP, and other relevant policies within the submitted Plan, the development of the site should include a series of matters including a mix of houses, a play area and guidance on the location of parking spaces.
- 7.50 In principle the refinement of a policy in an adopted or emerging Local Plan in a neighbourhood plan is entirely appropriate. In this broader context I note the proposed development of the site is not opposed in principle by TPC and that, other than specific comments from SNC the development of the site is not contested.
- 7.51 I sought advice from TPC about the evidence to justify the delivery of more open space than needed to meet the additional demands arising from development. In its response to the clarification note it advised that:
- ‘delivery of open space at the front of the development is to for amenity and aesthetic value (reference to Objective 2, ‘complement the character of Tasburgh’). Para 7.16 and 7.17 covers the justification for both comments. Criteria (b) is to serve the development and community. Criteria (e) is for landscape and aesthetic value.’*
- 7.52 I have considered this matter carefully and have considered SNC’s comments on the matter. On the balance of the evidence, I recommend the deletion of both criteria b and e. Neither the relevant policy in the adopted SSAPD nor the policy in the emerging VCHAP include the requirement for open space, and TPC has not provided detailed evidence to justify such a requirement. Nevertheless, I recommend that the aspirations in the submitted policy on this point are relocated into the supporting text to act as a basis for detailed discussions which may take place on the eventual development of the site.
- 7.53 As submitted the criterion on vehicular access conflicts with Policy VC TAS1 of the emerging VCHAP. SNC advises the requirement for vehicular access from both Church Road and Henry Preston Road (in the emerging VCHAP) was determined following advice from Norfolk County Council Highways to make the access acceptable. In this context I sought clarity from TPC about the way in which it has addressed this matter. In its response to the clarification note it advised that:
- ‘the justification for this is based on local knowledge and representation as stated in paragraph 7.17. Criteria (f) – this is strongly felt by the community on the grounds of further traffic congestion and pedestrian safety next to the primary school.’*
- 7.54 I have considered this matter very carefully. Plainly a secondary access to the site off Henry Preston Road could increase the use of this Road and to add to the peak activity at the beginning and end of the school day. Nevertheless, as SNC advise the requirement on access in the VCHAP reflects the advice from Norfolk County Council

in its capacity as the highway authority. In addition, any safety concerns about the School can be assessed and/or incorporated into detailed designs for the development of the site. On this basis I recommend the deletion of the criterion.

- 7.55 I also recommend consequential modifications to the supporting text on this matter.
- 7.56 Finally I recommend other modifications to the wording of the policy so that it will have the clarity required by the NPPF and be able to be delivered in a clear way by SNC through the development management process. Otherwise, the policy meets the basic conditions. It will help to boost the supply of housing land in the parish. In doing so it will contribute to the delivery of each of the three dimensions of sustainable development.

Replace ‘the site should include the following’ with ‘the development of land to the north of Church Road for residential purposes should incorporate the following matters:’

In a. replace ‘See TAS 8’ with ‘as set out in Policy TAS8 of this Plan’

Delete b.

Replace c. with ‘A density of houses, plots and street layouts that responds positively to the location of the site on the north-western edge of Upper Tasburgh.’

Replace d. with ‘Wherever practicable, car parking should be located to the side or rear of properties. Otherwise, parking should be screened from the street, preferably through soft landscaping.’

Delete e. and f.

Replace h. with: ‘Street lighting within the development should respond positively to the contents of Policy TAS5’

At the end of paragraph 7.16 add: ‘These opportunities may act as a basis for detailed discussions which take place on the eventual development of the site between South Norfolk Council and the landowner/developer.’

Delete paragraph 7.17

TAS10: Business development and digital connectivity

- 7.57 This policy comments about business development. It has three related elements as follows:
- new or expanded business and employment uses will be supported where proposals have taken account of the Tasburgh Design Guidance and Codes and demonstrated respect for the character of the rural area, residential amenity, and highway safety. Light industrial and retail development on the A140 is particularly encouraged where it provides local employment

opportunities. All new or expanded business units should be adjacent to existing businesses on the A140 (this does not apply to small businesses);

- new dwellings should provide for high-speed digital connectivity where practical and achievable; and
- development providing space for homeworking, including home offices, will be supported.

7.58 The policy includes both general and parish-based elements. In the round it takes a positive approach to the matter and has regard to Section 6 of the NPPF. However, in this wider context I recommend the following modifications to bring the clarity required by the NPPF and to ensure that appropriate environmental safeguards are in place:

- the use of wording more appropriate to a neighbourhood plan;
- the incorporation of the element about new business units being adjacent to existing business into the principal part of the policy;
- the deletion of the reference for the provision of access to Broadband as this matter is now addressed in Part R of the Building Regulations; and
- the inclusion of environmental safeguards into the element of the policy on home working

7.59 I also recommend that the title of the policy is modified to reflect the deletion of the digital connectivity from the policy. Otherwise, the policy meets the basic conditions. It will contribute to the delivery of each of the three dimensions of sustainable development.

Replace the policy with:

‘Proposals for new or expanded business and employment uses will be supported where they have taken account of the Tasburgh Design Guidance and Codes and respect the character of the rural area, the amenity of any residential properties in the immediate locality, and highway safety. Proposals for light industrial and retail developments on the A140 adjacent to existing business premises will be particularly supported where they provide local employment opportunities.

Development proposals for homeworking, including home offices, will be supported where they respect the character of their immediate locality, and the amenity of any nearby residential properties.’

Replace the policy’s title with: ‘Business Development’

TAS11: Historic core and Non-designated Heritage Assets

7.60 This is a wide ranging-policy on heritage assets. It has three key parts as follows:

- the area shown on figure 28 is identified locally as an important ‘historic core’ due to the setting of the Tasburgh Enclosure (Scheduled Monument) and St Mary the Virgin Church, round tower church (Grade I listed building);
- buildings or structures (figure 29) are identified as Non-designated Heritage Assets due to their locally important character and historic features; and

- development proposals should conserve these heritage assets in a manner appropriate to their significance.

7.61 The policy takes a very positive approach to heritage matters. The identification of an important historic core is very distinctive to the parish. I looked at some of the proposed non-designated heritage assets. It was clear that they had been carefully-selected. The policy approach taken has regard to paragraph 209 of the NPPF

7.62 I am satisfied that the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

TAS12: Public rights of way, footpaths, and cycleways

7.63 This policy has two related parts. The first advises that opportunities to enhance and join up networks of footpaths and cycleways (including public rights of way) that are suitable for all users, should be included within the design of new residential developments. It also advises that footpaths and cycle ways should be visible and separate from roads where possible, for example such as Grove Lane. The second part of the policy advises that the provision of new footpaths and cycleways will be supported.

7.64 The policy takes a positive approach to this issue. I saw the importance of the local footpath network during the visit and the way in which it added to accessibility and social well-being. I recommend that the first part of the policy is modified so that it can be applied in a proportionate way. Plainly different proposals will present different opportunities (or none) to connect to the existing network.

7.65 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

Replace the first sentence of the first part of the policy with:

‘As appropriate to their scale, nature and location, the design of new residential developments should include opportunities to enhance and join up networks of footpaths and cycleways (including Public Rights of Way) that are suitable for all users, within their designs and layouts.’

TAS13: Existing and new community infrastructure

7.66 This is an important policy in the Plan. It identifies nine community facilities. It has three related elements:

- improvements to existing community infrastructure will be supported in principle;
- proposals for change of use, involving a potential loss of existing community infrastructure, will only be supported where they meet specific criteria; and
- proposals for the following new community infrastructure will be supported.

7.67 The policy takes a positive approach to this matter and acknowledges the importance of community facilities to the well-being of the parish. I am also satisfied that the identified facilities are important within the parish and are worthy of the approach taken

in the policy. However, in this wider context I recommend the following modifications to bring the clarity required by the NPPF and to ensure that appropriate environmental safeguards are in place:

- the Plan specifically identifies the facilities for the purpose of the policy rather than making a factual statement;
- ensuring that the element of the policy about the improvement of existing facilities is shifted to the first part of the policy; and
- ensuring that this element of the policy includes environmental safeguards.

7.68 Otherwise, the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

In the first part of the policy replace ‘Tasburgh parish has the following existing community infrastructure (figure 34):’ with ‘The Plan identifies the following existing community infrastructure (as shown on figure 34):’

At the end of the first part of the policy add: ‘Proposals for the improvement, adaptation or extension of existing community infrastructure will be supported where they comply with other development plan policies.’

In the second part of the policy delete ‘Improvements to existing community infrastructure will be supported in principle.’

TAS14: The village hall site

7.69 The Plan comments that the context for the policy is that as Tasburgh grows, an improved Village Hall may be needed. Through local consultation it has been recognised that there is potential to extend the existing building, refurbish it, or replace the building all together (in the long term) which would enable further community and/or business use. As working arrangements have changed for many since the Covid pandemic, the Plan advises that there is more openness to working from home and within a local community building.

7.70 The policy advises that any proposals for the redevelopment of the Village Hall site will be supported in principle. It comments that this could take the form of an extension to the existing building, or a replacement building, and should enable further community and/or business use. Specific uses to be delivered in a new village hall are also identified in the policy.

7.71 This is an important policy within the overall context of the Plan. I saw the importance of the Village Hall during the visit, and its central location within the Parish. The policy takes a positive approach to the matter. However, I recommend that the opening element of the first part of the policy is reconfigured so that it better expresses the various development options and the way in which different component uses would be supported. I also recommend a modification to the second part of the policy to bring the clarity required by the NPPF.

7.72 Otherwise the policy meets the basic conditions. It will contribute to the delivery of the social and the environmental dimensions of sustainable development.

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Replace the opening element of the first part of the policy with:

‘Proposals for the redevelopment of the Village Hall site, an extension to the existing building, and/or a replacement building will be supported. The incorporation of the following uses within a new or reconfigured Village Hall will be particularly supported:’

In the second part of the policy replace ‘possible’ with ‘practicable’

Community action projects

- 7.73 The Plan includes a series of community action projects. They are non-land use issues which have naturally arisen whilst the Plan was being prepared.
- 7.74 The projects are as follows:
- repair/replacement of Village Hall play area;
 - provide a cycle path between Tasburgh and Long Stratton;
 - investigate potential for linking the Boudicca Way with a pathway from Fairstead Lane northwards;
 - investigate other potential linking footpaths within the parish;
 - the provision of additional allotment provision; and
 - the development of long-term plans for burial spaces within the parish.
- 7.75 I am satisfied that the projects are appropriate and distinctive to the parish. In addition, they are properly set out in a separate part of the Plan in accordance with national guidance.

Monitoring and Review

- 7.76 Section 12 of the Plan addresses the monitoring and review process in a positive way. This is best practice.
- 7.77 Section 5 of this report and the Basic Conditions Statement have commented about the relationship between the submitted Plan and the emerging GNLP. Given the importance of the adoption of the emerging plan on the planning policy context in the neighbourhood area I recommend that paragraph 12.5 of the Plan is expanded so that it provides guidance to residents and the development industry alike about the way in which the Plan will respond to the adoption of that Plan. This process should also relate to the emerging VCHAP
- 7.78 The language used in the recommended modifications acknowledges that in the same way that there is no requirement for a town council or parish council to produce a neighbourhood plan, there is no requirement for those organisations to review a ‘made’ neighbourhood plan. Nevertheless, the recommended wording has been designed to recognise that where there is a conflict between different elements of the development plan, the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan. Plainly a review of a made Plan will have the ability to keep its contents up-to-date and to be aligned to the wider development plan throughout the Plan period.

At the end of paragraph 12.5 add:

‘Any neighbourhood plan operates within the wider context provided by national planning policy and local planning policy. The Parish Council will monitor and assess the implications of any changes to national or local planning policy on the Plan throughout the Plan period. Where necessary it will consider the need for a partial review of the Plan.

The eventual adoption of both the Greater Norwich Local Plan and the South Norfolk Village Cluster Housing Allocation Plan could bring forward important changes to local planning policy. In this context the Parish Council will assess the need or otherwise for a full or partial review of the neighbourhood plan within six months of the adoption of both these Plans.’

Other Matters - General

- 7.79 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text may be required elsewhere in the Plan because of the recommended modifications to the policies. Similarly, changes may be necessary to paragraph numbers in the Plan or to accommodate other administrative matters. It will be appropriate for SNC and TPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.

Other Matters – Specific

- 7.80 SNC has made a series of helpful comments on the Plan. I have included them in the recommended modifications on a policy-by-policy basis where they are required to ensure that the Plan meets the basic conditions.
- 7.81 In a more general way, SNC advises that while maps have been provided for individual policies, it does not appear that a comprehensive Policies Map, showing all the areas affected by all policies, has been included. SNC suggests that this is provided in order that the Plan can be accessible and to assist policy presentation, in line with paragraph 16 e) of the NPPF. In its response to the clarification note, TPC acknowledged the importance of such an approach. I recommend accordingly.

Include a comprehensive Policies Map in the Plan

- 7.82 Norfolk County Council raises a series of technical comments in its capacity as the Lead Local Flood Authority. The incorporation of the comments into the Plan would add to its comprehensive approach to flooding and surface water drainage. However, as they are not needed to ensure that the Plan meets the basic conditions, I have not recommended modifications to the Plan on this matter.

8 Summary and Conclusions

Summary

- 8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2038. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community to safeguard the character and setting of the neighbourhood area and to designate a series of Local Green Spaces.
- 8.2 Following the independent examination of the Plan, I have concluded that the Tasburgh Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood development plan subject to a series of recommended modifications.

Conclusion

- 8.3 On the basis of the findings in this report, I recommend to South Norfolk Council that, subject to the incorporation of the modifications set out in this report, the Tasburgh Neighbourhood Development Plan should proceed to referendum.

Other Matters

- 8.4 I am required to consider whether the referendum area should be extended beyond the neighbourhood area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved in May 2020.
- 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth manner. The responses to the clarification note were detailed, informative and delivered in a very timely fashion.

Andrew Ashcroft
Independent Examiner
5 February 2024

Tasburgh Neighbourhood Plan – South Norfolk Council Reg.16 representation and examiner responses

Section	Representation	Examiner’s recommendation	SNC Commentary
General comments	The Plan is well laid out and easy to follow. The policies are generally well justified and thought out. It is positive to see that the Council’s previous comments have, for the most part, been incorporated into the submitted Neighbourhood Plan.	N/A	N/A
Policies Map	While maps have been provided for individual policies, it does not appear that a comprehensive Policies Map, showing all of the areas affected by all policies, has been included. The Council would recommend that this is provided in order that the Plan can be accessible and to assist policy presentation, in line with paragraph 16 e) of the NPPF.	<i>Include a comprehensive Policies Map in the Plan</i>	This will help to give an overall view of the policies within the plan.

Section	Representation	Examiner's recommendation	SNC Commentary
Page 38 – Policy TAS1 Natural Assets	<p>The Council considers that this is a positive policy that takes a proactive approach to protecting the natural environment. The natural assets appear to be well justified and the policy includes guidance to follow when loss or damage to an asset is unavoidable. Specific guidance on delivering BNG is also supported, particularly the inclusion of creating connections between fragmented habitats. The Council does however consider that the section of “Loss of natural assets” should be expanded to cover off-site mitigation/compensation. Whilst it is reasonable to seek on-site mitigation/compensation as the sequentially preferable option in most circumstances, there may be circumstances where on-site mitigation/compensation cannot be achieved, or where off-site mitigation/compensation may be more beneficial in landscape and/or biodiversity terms. In order to ensure that the clarity required by paragraph 16 d of the NPPF is achieved, the Council considers that the policy should be amended in this way.</p>	<p>Delete ‘In addition to the Local Green Spaces (policy TAS2)’</p> <p>Replace the Loss of Natural Asset section with: ‘Where loss or damage is unavoidable, the development shall provide for appropriate replacement planting or appropriate natural features on site together with a method statement for the ongoing care and maintenance of that planting. Where this approach is not practicable, appropriate off-site mitigation/compensation should be incorporated into the development proposal. In either case, a method statement for the ongoing care and maintenance of the planting should be included in the proposal.’</p> <p>In the ‘Enhancing Biodiversity’ section replace ‘All development proposals’ with ‘As appropriate to their scale, nature and location, development proposals’.</p> <p><i>At the end of paragraph 6.3 add: ‘Policy TAS1 Addresses natural assets. Policy TAS2 addresses local green spaces. Other policies in this part of the Plan comment about important views, climate change and dark skies.’</i></p>	<p>The recommendation addresses the Council’s concern that the loss of natural assets should be expanded to cover off-site mitigation or compensation.</p>

Section	Representation	Examiner’s recommendation	SNC Commentary
<p>Page 48 – Policy TAS4 Climate change, flood risk and surface water drainage issues</p>	<p>The Council feels that the term, ‘large development’ needs to be defined. Is this the same as Major Development (10+ dwellings or 0.5+ hectares)? Without a definition of what this is or consistent use of terms it will be difficult for officers to apply this policy consistently. The Council considers that this should be defined in order to bring the clarity required by paragraph 16 d) of the NPPF.</p>	<p>Replace the policy with:</p> <p>‘As appropriate to their scale, nature and location development proposals should:</p> <ul style="list-style-type: none"> • demonstrate how they can mitigate their own flooding and drainage impacts, avoid an increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates for flooding (see figure 20 flood risk); • respond positively to the advice and guidance on surface water drainage and the mitigation of flood risk obtainable from Norfolk County Council (as Lead Local Flood Authority) and the relevant Internal Drainage Board (as statutory Drainage Board for the Plan area); and • where appropriate, mitigate and adapt to climate change. <p>Proposals for major development should include sustainable drainage systems unless it is impracticable to do so.’</p> <p><i>In paragraph 6.29 replace ‘This is identified in policy TAS4’ with ‘This part of the parish is particularly important for the application of Policy TAS4.’</i></p> <p><i>At the end of paragraph 6.31 add: ‘Policy TAS4 has a proportionate element to acknowledge that individual proposals will have different impacts (if any) on surface water drainage issues and flooding. The policy has a specific requirement for major</i></p>	<p>The Council’s concern related to the definition of major development. The examiners recommendation to para 6.31 addresses this by referring to a recognised definition. The examiner also makes modifications to ensure the policy is proportionate.</p>

Section	Representation	Examiner's recommendation	SNC Commentary
		<i>developments. For clarity a major development is that as defined by the Town & Country Planning Development Management Procedure Order (2015).'</i>	
Page 49 – Policy TAS5 Dark Skies	The Council considers that the last line should be reworded to state that this 'will not be permitted' or 'will not be supported', to provide the clarity required by the NPPF.	<p>In the first part of the policy replace 'must' with 'should' and 'permitted' with 'supported'</p> <p>In the second part of the policy replace 'permitted' with 'supported'</p>	The recommendation helps bring clarity required by NPPF and addresses the Council's comments.
Page 52 – Figure 23	There is no key on this map to distinguish between the 3 different character areas. The Council considers it would be helpful for a key to be provided to show which colour represents which area, in order to provide the clarity required by the NPPF.		

Section	Representation	Examiner’s recommendation	SNC Commentary
<p>Pages 53/54 – TAS6 Design guidelines and codes</p>	<p>The Council previously raised a concern that the area of the proposed TAS1 allocation (as proposed in the Village Clusters Housing Allocations Plan) would appear to be designated as part of the ‘Transition Area’, as set out within this Policy. The Council remains of the opinion that the allocation site is more appropriately read in the context of Upper Tasburgh, with the more historic, rural elements of the village largely lying in the area beyond Old Hall Farm Bungalow.</p> <p>In addition, the extent of the ‘Transition Area’ covers the open space of the Tasburgh Enclosure. Presumably the development guidelines for this character area, as set out in the policy, should not apply to such a sensitive archaeological and heritage site?</p> <p>On this basis, the Council remains of the opinion that the Transition Area boundary should be amended so that the proposed allocation site is incorporated within the ‘Upper Tasburgh’ character area and so that the boundary follows the road and existing residential development, without extending into the open fields.</p> <p>The Council considers that these changes are necessary in order to ensure that the policy is clear and precise and that it contributes to sustainable development, in accord with paragraph 16 of the NPPF.</p>	<p>In the second part of the policy replace ‘Proposals for new development should accord with the parish-wide principles laid out’ with ‘As appropriate to their scale, nature and location, proposals for new development should accord with the parish-wide principles set out’</p> <p>In the Design Guidance and Codes include the parcels of land as proposed to be allocated for housing development in the emerging VCHAP within the Upper Tasburgh Character Area rather than the Transition Area (between Upper and Lower Tasburgh).</p>	<p>The Council raised concerns about the revised boundaries of the character areas in light of the proposed housing allocation in the emerging Village Clusters Housing Allocations Plan (VCHAP) as this site would be better suited in the Upper Tasburgh area rather than the Transition Area. The examiner’s recommendation addresses this issue.</p>

Section	Representation	Examiner's recommendation	SNC Commentary
<p>Page 57 – TAS7 Housing location, pattern and scale</p>	<p>The Council previously raised a concern that the section of the policy dealing with the 'Gap between Upper and Lower Tasburgh' could be more positively written as well as being more precise, in terms of the area being referred to.</p> <p>Although some wording has been removed, the removal of the second sentence (commencing 'Development that would individually or cumulatively erode...') would help to ensure that this part of the policy is positively worded.</p> <p>In addition, the Council remains of the opinion that a clearer and more precise map, setting out the precise boundary of the gap between the two areas, would help to ensure the clarity of the policy. Currently, it is not apparent from Figure 24 that such a gap exists.</p> <p>Such amendments will help to bring the clarity and positive wording required by the NPPF (paragraph 16).</p>	<p>In the 'Location of New Housing' and 'Infill and Windfall Development' sections of the policy delete 'only'</p> <p>Include a clearer and more precise map, setting out the precise boundary of the gap between Upper and Lower Tasburgh in the Plan either in addition to figure 4 or within the context of figure 4.</p>	<p>The Council recommended that this policy could be more positively worded and the addition of a clear and precise map would help with the clarity of this policy.</p> <p>Whilst the recommendation only makes a small adjustment to the wording, the recommendation to include a map will help decision makers when applying this policy.</p>

Section	Representation	Examiner's recommendation	SNC Commentary
Page 64 – TAS8 Housing Mix	This policy states that there is a greater need for affordable housing and specialist housing in the parish. The Council considers that the policy should be amended to improve its clarity, as required by paragraph 16 of the NPPF. The Council suggests that the first sentence of the paragraph under the heading 'Affordable Housing', is amended to 'In line with the findings of the Tasburgh Housing Needs Assessment, opportunities should be taken to maximise the delivery of affordable housing, where appropriate, above the minimum required by the Local Plan.'	<p>Replace the first sentence of the 'Affordable Housing' section with: 'In line with the findings of the Tasburgh Housing Needs Assessment, opportunities should be taken to maximise the delivery of affordable housing, where appropriate, above the minimum required by the Local Plan.'</p> <p>In the second sentence of the 'Affordable Housing' section replace 'Major residential development proposals' with 'Where it is both practicable and viable to do so, major residential development proposals'</p> <p>Replace the 'Specialist Housing' section of the policy with: 'Proposals for specialist housing, particularly for older people, will be supported. Wherever practicable new homes should be built to the adopted accessible and adaptable dwellings standards.'</p>	The examiner recommendations incorporate comments made by the Council at the Regulation 16 stage. The changes help to bring clarity to the policy.

Section	Representation	Examiner's recommendation	SNC Commentary
Page 68 – TAS9 Site north of Church Road	<p>The Council has previously commented that it is not clear if the provision of a children's play area would exceed open space standards. The policy as it is currently worded still does not make this clear. The inclusion of the play area as a distinctly separate criteria does make it appear as an additional requirement to the general open space required. It is acknowledged that criteria 'b' does state that the play area should be delivered where possible; however the concern remains as to why the development would justify being required to deliver more open space than needed to meet the additional demands arising from development. The Council is concerned that this does not meet the NPPF requirement for plans to be 'aspirational but deliverable' (para. 16 b) and to be 'based on proportionate evidence' (para 35 b).</p> <p>Criteria 'f' as it is written conflicts with the emerging policy VC TAS1 in the emerging South Norfolk Village Clusters Housing Allocations Plan. As stated in previous comments, the requirement for vehicular access from both Church Road and Henry Preston Road was determined by consultation with Norfolk County Council Highways in order to make the access acceptable.</p> <p>As Government guidance states, 'although a draft neighbourhood plan is not tested</p>	<p>Replace 'the site should include the following' with 'the development of land to the north of Church Road for residential purposes should incorporate the following matters:'</p> <p>In a. replace 'See TAS 8' with 'as set out in Policy TAS8 of this Plan'</p> <p>Delete b.</p> <p>Replace c. with 'A density of houses, plots and street layouts that responds positively to the location of the site on the north-western edge of Upper Tasburgh.'</p> <p>Replace d. with 'Wherever practicable, car parking should be located to the side or rear of properties. Otherwise, parking should be screened from the street, preferably through soft landscaping.'</p> <p>Delete e. and f.</p> <p>Replace h. with: 'Street lighting within the development should respond positively to the contents of Policy TAS5'.</p> <p><i>At the end of paragraph 7.16 add: 'These opportunities may act as a basis for detailed discussions which take place on the eventual development of the site between South Norfolk Council and the landowner/developer.'</i></p> <p><i>Delete paragraph 7.17.</i></p>	<p>The Council made comments in relation to some of the criteria within this policy and how these conflict with the proposed allocation in the VCHAP.</p> <p>The examiner has assessed these comments and the evidence provided and has recommended the removal of the conflicting criteria as well as some additional rewording.</p> <p>The Council is content that these revisions remove the conflicts previously identified.</p>

Section	Representation	Examiner's recommendation	SNC Commentary
	<p>against the policies in an emerging local plan, the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.' Therefore, the Council considers that this element of the policy is not in accord with the basic conditions with which the Neighbourhood Plan should be in conformity.</p>	<p><i>As set out within 'Revision to Examiner's Report':</i></p> <p>In Policy TAS9 delete the final paragraph (which refers to the Design Guidance and Codes)</p>	

Factual / Typographical Corrections

Section	Factual Correction
Page 38 – TAS1: Natural assets	There is a typo at the end of the first line, referring to figures – both refer to figure 15.
Page 61 - Paragraph 7.11	In the third bullet point of this paragraph, it states ‘...to accommodate the 25 percent First Homes requirement mandated nationally...’. This figure is not ‘mandated nationally’ – it is a minimum requirement which can be exceeded if necessary.

Tasburgh Neighbourhood Plan - Decision Statement

1. Summary

Following an independent examination, South Norfolk Council have received the examiner's report relating to the Tasburgh Neighbourhood Plan. The report makes a number of recommendations for making modifications to policies within the Neighbourhood Plan. South Norfolk Council has made a decision to approve each of the examiner's recommendations and to allow the Neighbourhood Plan to proceed to a referendum within the neighbourhood area.

2. Background

Following the submission of the Tasburgh Neighbourhood Plan to South Norfolk Council in July 2023, the Neighbourhood Plan was published in accordance with Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 and representations invited. The publication period took place between 18th October and 29th November 2023.

South Norfolk Council, with the approval of Tasburgh Parish Council (the Qualifying Body), subsequently appointed an independent examiner, Mr Andrew Ashcroft, to conduct an examination of the submitted Neighbourhood Plan and conclude as to whether it meets the Basic Conditions (as defined by Schedule 4B of the Town and Country Planning Act 1990) and consequently whether the Plan should proceed to referendum.

The examiner's report concludes that, subject to making certain recommended modifications, the Neighbourhood Plan meets the basic conditions for neighbourhood planning and should proceed to a Neighbourhood Planning referendum within the adopted neighbourhood area.

3. Decision

Having considered each of the recommendations in the examiner's report and the reasons for them, South Norfolk Council has decided to approve each of the examiner's recommended modifications. This is in accordance with section 12 of Schedule 4B to the Town and Country Planning Act 1990. The Councils consider that this decision will ensure that the Neighbourhood Plan meets the basic conditions.

The following table sets out the examiner's recommended modifications, the Councils' consideration of those recommendations, and the Councils' decision in relation to each recommendation.

Subject to the modifications approved by South Norfolk Council, as set out in the table below, the Councils are satisfied that the Neighbourhood Plan should proceed to a referendum within the neighbourhood area, in accordance with part 12(4) of Schedule 4B of the Town & Country Planning Act 1990.

Section	Examiner's recommendation	Consideration of recommendation	LPAs decision
TAS1: Natural Assets	<p>Delete 'In addition to the Local Green Spaces (policy TAS2)'</p> <p>Replace the Loss of Natural Asset section with: 'Where loss or damage is unavoidable, the development shall provide for appropriate replacement planting or appropriate natural features on site together with a method statement for the ongoing care and maintenance of that planting. Where this approach is not practicable, appropriate off-site mitigation/compensation should be incorporated into the development proposal. In either case, a method statement for the ongoing care and maintenance of the planting should be included in the proposal.'</p> <p>In the 'Enhancing Biodiversity' section replace 'All development proposals' with 'As appropriate to their scale, nature and location, development proposals'</p> <p><i>At the end of paragraph 6.3 add: 'Policy TAS1 Addresses natural assets. Policy TAS2 addresses local green spaces. Other policies in this part of the Plan comment about important views, climate change and dark skies.'</i></p>	<p>The recommendation addresses the Council's concern that the loss of natural assets should be expanded to cover off-site mitigation or compensation.</p>	<p>Agree to the recommended modifications.</p>
TAS3: Important Local Views	<p>In the opening part of the policy replace 'must' with 'should'</p> <p>Replace the final part of the policy with: 'Development proposals within or affecting an important local view should demonstrate how they have responded positively to the view concerned and safeguarded its integrity and local importance.'</p>	<p>The recommendation is made to allow the policy to be implemented more consistently.</p>	<p>Agree to the recommended modifications.</p>

Section	Examiner's recommendation	Consideration of recommendation	LPAs decision
<p>TAS4: Climate change, flood risk and surface water drainage issues</p>	<p>Replace the policy with:</p> <p>'As appropriate to their scale, nature and location development proposals should:</p> <ul style="list-style-type: none"> • demonstrate how they can mitigate their own flooding and drainage impacts, avoid an increase of flooding elsewhere and seek to achieve lower than greenfield runoff rates for flooding (see figure 20 flood risk); • respond positively to the advice and guidance on surface water drainage and the mitigation of flood risk obtainable from Norfolk County Council (as Lead Local Flood Authority) and the relevant Internal Drainage Board (as statutory Drainage Board for the Plan area); and • where appropriate, mitigate and adapt to climate change. <p>Proposals for major development should include sustainable drainage systems unless it is impracticable to do so.'</p> <p><i>In paragraph 6.29 replace 'This is identified in policy TAS4' with 'This part of the parish is particularly important for the application of Policy TAS4.'</i></p> <p><i>At the end of paragraph 6.31 add: 'Policy TAS4 has a proportionate element to acknowledge that individual proposals will have different impacts (if any) on surface water drainage issues and flooding. The policy has a specific requirement for major developments. For clarity a major development is that as defined by the Town & Country Planning Development Management Procedure Order (2015).'</i></p>	<p>The Council's concern related to the definition of major development. The examiners recommendation to para 6.31 addresses this by referring to a recognised definition. The examiner also makes modifications to ensure the policy is proportionate.</p>	<p>Agree to the recommended modifications.</p>

Section	Examiner's recommendation	Consideration of recommendation	LPAs decision
TAS5: Dark skies	<p>In the first part of the policy replace 'must' with 'should' and 'permitted' with 'supported'</p> <p>In the second part of the policy replace 'permitted' with 'supported'</p>	The recommendation helps bring clarity required by NPPF and addresses the Council's comments.	Agree to the recommended modification.
TAS6: Design guidelines and codes	<p>In the second part of the policy replace 'Proposals for new development should accord with the parish-wide principles laid out' with 'As appropriate to their scale, nature and location, proposals for new development should accord with the parish-wide principles set out'</p> <p><i>In the Design Guidance and Codes include the parcels of land as proposed to be allocated for housing development in the emerging VCHAP within the Upper Tasburgh Character Area rather than the Transition Area (between Upper and Lower Tasburgh).</i></p>	The Council raised concerns about the revised boundaries of the character areas in light of the proposed housing allocation in the emerging Village Clusters Housing Allocations Plan (VCHAP) as this site would be better suited in the Upper Tasburgh area rather than the Transition Area. The examiner's recommendation addresses this issue.	Agree to the recommended modification.
TAS7: Housing location, pattern, and scale	<p>In the 'Location of New Housing' and 'Infill and Windfall Development' sections of the policy delete 'only'</p> <p><i>Include a clearer and more precise map, setting out the precise boundary of the gap between Upper and Lower Tasburgh in the Plan either in addition to figure 4 or within the context of figure 4.</i></p>	<p>The Council recommended that this policy could be more positively worded and the addition of a clear and precise map would help with the clarity of this policy.</p> <p>Whilst the recommendation only makes a small adjustment to the wording, the recommendation to include a map will help decision makers when applying this policy.</p>	Agree to the recommended modification.

Section	Examiner's recommendation	Consideration of recommendation	LPAs decision
TAS8: Housing mix	<p>Replace the first sentence of the 'Affordable Housing' section with: 'In line with the findings of the Tasburgh Housing Needs Assessment, opportunities should be taken to maximise the delivery of affordable housing, where appropriate, above the minimum required by the Local Plan.'</p> <p>In the second sentence of the 'Affordable Housing' section replace 'Major residential development proposals' with 'Where it is both practicable and viable to do so, major residential development proposals'</p> <p>Replace the 'Specialist Housing' section of the policy with: 'Proposals for specialist housing, particularly for older people, will be supported. Wherever practicable new homes should be built to the adopted accessible and adaptable dwellings standards.'</p>	The examiner recommendations incorporate comments made by the Council at the Regulation 16 stage. The changes help to bring clarity to the policy.	Agree to the recommended modifications.

Section	Examiner's recommendation	Consideration of recommendation	LPAs decision
<p>TAS9: Land north of Church Road and west of Tasburgh School</p>	<p>Replace 'the site should include the following' with 'the development of land to the north of Church Road for residential purposes should incorporate the following matters:'</p> <p>In a. replace 'See TAS 8' with 'as set out in Policy TAS8 of this Plan'</p> <p>Delete b.</p> <p>Replace c. with 'A density of houses, plots and street layouts that responds positively to the location of the site on the north-western edge of Upper Tasburgh.'</p> <p>Replace d. with 'Wherever practicable, car parking should be located to the side or rear of properties. Otherwise, parking should be screened from the street, preferably through soft landscaping.'</p> <p>Delete e. and f.</p> <p>Replace h. with: 'Street lighting within the development should respond positively to the contents of Policy TAS5'</p> <p><i>At the end of paragraph 7.16 add: 'These opportunities may act as a basis for detailed discussions which take place on the eventual development of the site between South Norfolk Council and the landowner/developer.'</i></p> <p><i>Delete paragraph 7.17</i></p> <p>As set out within Examiner's own 'Revision to Examiner's Report', dated 01/03/2024 (page 2 of published report):</p> <p>In Policy TAS9 delete the final paragraph (which refers to the Design Guidance and Codes)</p>	<p>The Council made comments in relation to some of the criteria within this policy and how these conflict with the proposed allocation in the VCHAP.</p> <p>The examiner has assessed these comments and the evidence provided and has recommended the removal of the conflicting criteria as well as some additional rewording.</p> <p>The Council is content that these revisions remove the conflicts previously identified.</p>	<p>Agree to the recommended modifications.</p>

Section	Examiner's recommendation	Consideration of recommendation	LPAs decision
TAS10: Business development and digital connectivity	<p>Replace the policy with:</p> <p>'Proposals for new or expanded business and employment uses will be supported where they have taken account of the Tasburgh Design Guidance and Codes and respect the character of the rural area, the amenity of any residential properties in the immediate locality, and highway safety. Proposals for light industrial and retail developments on the A140 adjacent to existing business premises will be particularly supported where they provide local employment opportunities.</p> <p>Development proposals for homeworking, including home offices, will be supported where they respect the character of their immediate locality, and the amenity of any nearby residential properties.'</p> <p><i>Replace the policy's title with: 'Business Development'</i></p>	The recommendations help to bring further clarity to the policy wording.	Agree to the recommended modifications.
TAS12: Public rights of way, footpaths, and cycleways	<p>Replace the first sentence of the first part of the policy with:</p> <p>'As appropriate to their scale, nature and location, the design of new residential developments should include opportunities to enhance and join up networks of footpaths and cycleways (including Public Rights of Way) that are suitable for all users, within their designs and layouts.'</p>	The recommendations help to allow the policy to be applied in a proportionate way.	Agree to the recommended modifications.

Section	Examiner's recommendation	Consideration of recommendation	LPAs decision
TAS13: Existing and new community infrastructure	<p>In the first part of the policy replace 'Tasburgh parish has the following existing community infrastructure (figure 34):' with 'The Plan identifies the following existing community infrastructure (as shown on figure 34):'</p> <p>At the end of the first part of the policy add: 'Proposals for the improvement, adaptation or extension of existing community infrastructure will be supported where they comply with other development plan policies.'</p> <p>In the second part of the policy delete 'Improvements to existing community infrastructure will be supported in principle.'</p>	The recommendations help to bring clarity to the policy wording.	Agree to the recommended modifications.
TAS14: The village hall site	<p>Replace the opening element of the first part of the policy with:</p> <p>'Proposals for the redevelopment of the Village Hall site, an extension to the existing building, and/or a replacement building will be supported. The incorporation of the following uses within a new or reconfigured Village Hall will be particularly supported:'</p> <p>In the second part of the policy replace 'possible' with 'practicable'</p>	The examiner's recommendation to the opening element of the first part of the policy to better express the various development options and the way in which different component uses would be supported. There is also a recommended modification to the second part of the policy to bring the clarity required by the NPPF.	Agree to the recommended modifications.

Section	Examiner's recommendation	Consideration of recommendation	LPAs decision
Monitoring and Review	<p><i>At the end of paragraph 12.5 add:</i></p> <p><i>'Any neighbourhood plan operates within the wider context provided by national planning policy and local planning policy. The Parish Council will monitor and assess the implications of any changes to national or local planning policy on the Plan throughout the Plan period. Where necessary it will consider the need for a partial review of the Plan.</i></p> <p><i>The eventual adoption of both the Greater Norwich Local Plan and the South Norfolk Village Cluster Housing Allocation Plan could bring forward important changes to local planning policy. In this context the Parish Council will assess the need or otherwise for a full or partial review of the neighbourhood plan within six months of the adoption of both these Plans.'</i></p>	This additional text helps to expand on the potential reasons for when a neighbourhood plan might need to be reviewed.	Agree to the recommended modifications.
Other Matters - General	<i>Modification of general text (where necessary) to achieve consistency with the modified policies and to accommodate any administrative and technical changes.</i>	This recommendation allows for changes to be made where appropriate in light of other recommendations in the report.	Agree to the recommended modifications.
Other Matters – Specific	<i>Include a comprehensive Policies Map in the Plan</i>	This will help to give an overall view of the policies within the plan.	Agree to the recommended modifications.

4. Next Steps

This Decision Statement and the examiner's report into the Tasburgh Neighbourhood Plan will be made available online at:

- www.southnorfolkandbroadland.gov.uk/neighbourhood-plans

Printed copies of these documents have also been deposited at the following locations, where they can be viewed on request during normal opening hours:

- **Long Stratton Library**, The Street, Long Stratton, NR15 2XJ
- **South Norfolk Council**, The Horizon Centre, Broadland Business Park, Peachman Way, Norwich, NR7 0WF

South Norfolk Council is satisfied that, with the approved modifications as detailed above, the Tasburgh Neighbourhood Plan should proceed to a referendum within the neighbourhood area, in which the following question will be posed:

'Do you want South Norfolk Council to use the Neighbourhood Plan for Tasburgh to help them decide planning applications in the neighbourhood area?'

Further information relating to the referendum will be published by South Norfolk Council.

Agenda Item 7



**Agenda Item:
Cabinet
18 March 2024**

Strategic Performance, Risk and Finance Report for Quarter 3 2023/24

Report Author(s): **Finance:**
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Portfolio: Finance and Resources
Governance and Efficiency

Ward(s) 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 2023/24. This Quarterly Report covers Quarter 3.

Recommendations:

1. To endorse the revenue and capital position (variance details in Appendix 1).
2. To endorse the 2023/24 performance for Quarter 3 (detail 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 that an additional £95,000 be added to the list of additional works agreed at the South Norfolk Council meeting on 21st Feb 2024 to fund essential works to improve the current vehicle inspection facilities at Ketteringham Depot.

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 2023/24. A new Delivery Plan for 2024/25 will be implemented on 1st April. This Quarterly Report covers Quarter 3 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. The Council agreed in March 2020 to move forward with implementing the four-year Strategic Plan which sets out the vision and ambitions of the Council. Alongside this, the Council developed a Delivery Plan for 2022 - 24 which outlines the proposed projects and business as usual activities we would seek to deliver in the years 2022/23 and 2023/24.
- 2.2. At the heart of the Strategic Plan 2020-2024, is the vision for our place:
'Working together to create the best place for everyone, now and for future generations'
- 2.3. This vision is underpinned by the Council's strategic priorities:
- Growing the economy
 - Supporting individuals and empowering communities
 - Protecting and improving the natural and built environment, whilst maximising quality of life
 - Moving with the times, working smartly and collaboratively.
- 2.4. The Delivery Plan sets out the key activities to be delivered within the last two years of the Strategic Plan, broken down into service delivery and major projects/programmes of work. There is clear link between the Council's vision and aspirations, detailed in the Strategic Plan, the Council's priorities and projects, and the Strategic Performance and Finance Reports. To enable the activities to be monitored, the Delivery Plan provides several delivery measures which are reported into Cabinet in Quarter 2, Quarter 3, and Quarter 4.
- 2.5. This report summarises 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 – Delivery Measure Performance 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, SNC is facing a number of inflationary and demand pressures. Overall, there is a total pressure of £239,000 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 more than 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 SNC has spent £10.324m on capital schemes in 2023/24.

Finance Revenue Dashboard Overview

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

	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000
CORE SERVICES					
Chief of Staff	3,331	3,359	2,790	3,454	-95
Finance & Corporate Costs	3,235	2,820	1,635	3,039	-219
Transformation & ICT / Digital	3,066	3,087	2,681	3,404	-317
Economic Growth	561	831	1,424	812	19
Regulatory	761	770	674	847	-77
Planning & Business Support	755	808	-584	584	224
Individuals & Families	1,969	2,075	1,105	2,190	-115
Housing Benefit Payments	-250	-250	387	-250	0
Community Services	3,233	3,369	1,907	3,028	341
	16,661	16,869	12,019	17,108	-239
LEISURE					
Leisure Services	837	906	480	693	213
Transfer (from) Leisure Services Reserve	-500	-500		-505	5
Leisure Services one off VAT Refund				-854	854
Transfer to Leisure Services Reserve				854	-854
COVID SUPPORT					
COVID Support			83	83	-83
Transfer (from) Covid Reserve			-83	-83	83
OTHER PROJECTS					
Opportunity Revenue Projects		8	181	181	-173
Transfer (from) Op Project Reserve				-181	181
OTHER INCOME & EXPENDITURE					
Internal Drainage Board Levy	207	207	217	217	-10
Interest Payable / Minimum Revenue Provision	980	980	362	980	-
Investment Income - Big Sky	-1,372	-1,372	0	-1,197	-175
Investment Income - General	-978	-978	-2,580	-2,816	1,838

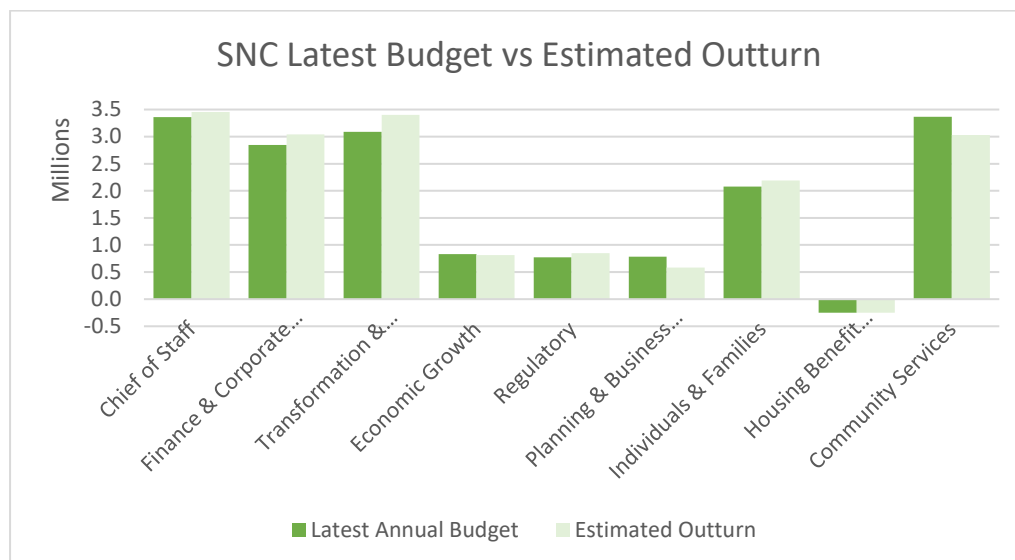
	Original Annual Budget (OAB) £'000	Latest Annual Budget (LAB) £'000	Actual to date £'000	Estimated Outturn (EO) £'000	Variance (LAB-EO) £'000
Council Tax Surplus	-112	-112	0	-112	0
TRANSFERS					
Transfers to / (from) Earmarked Reserves	2,042	1,782	2,035	1,782	-
Funds set aside (Council 21 Feb 24)				846	-846
Transfers to / (from) General Reserves	0	-25		770	-795
Total to be Funded by Taxpayers and Government Grants	17,765	17,765	12,714	17,765	

- 3.5. **Chief of Staff** is predicting an adverse variance of £95k against budget for the following main reason.
- Higher legal costs of £200k due to ongoing high profile legal cases is slightly offset by new burdens funding received from Government and lower than expected advertising costs.
- 3.6. **Finance** is predicting an adverse variance of £219k against budget for the following main reasons.
- Increased insurance premium costs £15k and bank charges of £20k.
 - Additional temporary staff costs of £49k 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.
 - £91k for Revenues for additional agency staff costs related to the implementation of the new system.
- 3.7. **Transformation and ICT** is predicting an adverse variance of £317k against budget for the following reasons.
- £99k 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.
 - £71k of savings are forecast from the transformation team restructure with £82k of savings forecast from customer services due to unfilled vacancies.
 - Estimation of a £230k overspend at the end of the year on South Norfolk House if the property is not disposed of in year, as no budget was allocated this year.
 - There is a possible £26k shortfall in Horizon tenancy income.
- 3.8. **Economic Growth** is predicting a favourable variance of £19k against budget for the following reasons.
- Additional business rates costs of £26k for the Ella May Barnes building as the Council is liable for rates costs until tenants are in place.
 - Other property management costs are higher than planned by a total of £110k. Mitigations for this expected increase in spend will be found across Economic Growth.
 - £46k higher costs on Community Assets for maintenance, electricity, increased costs for tree works and inspection fees.

- There is a £188k saving in Economic Growth, the majority consisting of a £146k on staffing, due to an establishment post being funded by a project, and further savings in vacancy turnover/reduced hours/retirement.
- 3.9. **Regulatory** is predicting an adverse variance of £77k. for the following reasons.
- Additional costs in Community and Environmental Protection including £71k for agency staff costs for an interim Environmental Protection Officer and £6k for additional staffing costs in the Food Safety and Licencing team.
- 3.10. **Planning and Business Support** is predicting a favourable variance of £224k against budget for the following reasons.
- Planning Policy is predicting a favourable variance of £199k, since the budget for the Design Code is unlikely to be spent this year (£51k) and will need to be carried forward to 24/25; additionally, partnership costs including Neighbourhood Plan costs are lower than expected.
 - The SNC element of CNC is reporting a favourable variance of £25k due to an increase in income following the increase in the support recharge.
 - In Business Support there are vacancies within the team which are unlikely to be filled in the short-term resulting in a favourable variance of £31k.
- 3.11. **Individuals & Families** is predicting an adverse variance of £115k to budget for the following main reason.
- A net pressure of £90k on temporary accommodation costs, due to on-the-spot purchased short stay or overnight temporary accommodation. Actual expenditure is £200k over budget but this has been mitigated by income from owned stock and increased Government funding.
 - Increased demand for spot purchased accommodation for rough sleepers. Funding supports seven cases, however current number supported is 17, leading to increased costs of £17k.
 - A requirement for temporary agency staffing in Benefits and Housing to manage demand through the housing register leading to increased costs of £38k.
- 3.12. **Housing Benefits** is predicting to be on budget.
- 3.13. **Community Services** is predicting a favourable variance of £341k against budget for the following reasons.
- A net £426k favourable variance in Waste, Waste Management and Recyclable Waste attributable to savings in fuel, additional income from bulky waste, commercial waste, new property bin sales and salary realignment between waste streams.
 - A net adverse variance of £65k for the Garden Waste service.
 - An adverse variance of £45k in Recycling Strategy due to Norfolk Waste Partnership costs being £19k higher than anticipated, £18k of maternity cover costs and additional costs of £9k due to increased costs of glass disposal.
- 3.14. **Leisure** is predicting favourable variance of £213k against budget for the following reasons.
- Increased income from growth in the usage of the centres and increased income as VAT is no longer payable on membership fees.
- 3.15. **Investment Income Interest** is received on external cash investments. Base rate increases by the Bank of England have led to increasingly higher investment rates being

available to the authority. This and higher than expected cash balances means we are currently forecasting general interest income of £2.816m, significantly exceeding the budgeted amount of £978k. Big Sky loan interest income has been revised down to £1,197m based on the existing loans.

3.16. The estimated outturn position is shown graphically below.



3.17. A more detailed analysis of the variances is attached at Appendix 1.

3.18. At the South Norfolk Council meeting on 21st February 2024, it was agreed to fund a number of additional one off projects as follows.

- £145,548 to top-up the Leisure Support Reserve to £1m, to be used to support the leisure service £250,000 per annum for the next 4 years.
- £355,000 into the 'Household Support Fund', to double existing support for hard pressed families in 2024/25.
- £30,000 allocated to the Help Hub to resource the operation of discretionary support schemes for residents facing hardship.
- £100,000 for the flood / ditch walker for another 24 months – With the Scrutiny committee to assess whether it is meeting its objectives by September 2024.
- £70,000 into a reserve for additional planning resource for 24 months.
- £50,000 to support design creation and community participation for Public Realm improvements for Wymondham.

Furthermore, this report requests an additional £95,000 be added to this list of additional works to fund essential works to improve the current vehicle inspection facilities at Ketteringham Depot.

Business Rates Income / NDR Pooling

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

Loans to Big Sky

3.20. The following table provides a summary of the investment in / loans to Big Sky.

	31 Mar 23 £	31 Dec 23 £
Shareholding in BSV	6,468,200	6,468,200
Loans to BSPM	3,159,800	3,159,800
Loans to BSD	28,400,000	16,960,000
	38,028,000	26,588,000

- 3.21. The current pause on being able to issue planning approval for new overnight accommodation, due to the new need to demonstrate that new developments can be delivered in a nutrient neutral way, is likely to have an impact on Big Sky. For instance, this is very likely to mean that new housing starts will be delayed, which will have an impact on future sales.
- 3.22. There are also risks if there is a housing market slowdown due to cost-of-living increases, inflation, potential/further interest rate increases and the amount of current mortgage approvals. However, the underlying Big Sky development model is still considered to be sound. But the current uncertainties are likely to require alterations to the Big Sky business plan. potentially changing the funding requirements. This could mean that South Norfolk Council is asked to change the amount loaned to Big Sky which would affect interest earnings.

Finance Capital Dashboard Overview

3.23. The following table provides a summary of the capital outturn position.

	Budget Manager	Provis ional	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								
Big Sky Developments	Debbie Lorimer		7,440	-	7,440	-	-	No new loans have currently been requested by Big Sky.
Big Sky Developments - New	Debbie Lorimer	Y	7,000	-	7,000	-	-	No new loans have currently been requested by Big Sky.
Development Opportunities on Cambridge/Norwich Arc	Phil Courtier		3,500	-	3,500	-	250	Cabinet approval granted to proceed with securing planning permission and exploring routes to acquisition.
Travellers Sites	Helen Mellors	Y	-	300	300	-	-	Budget not required in the current year.
Temporary Accommodation Security Improvements	Mike Pursehouse		15	11	26	39	39	
Temporary Accommodation - Property Purchase	Mike Pursehouse		1,205	-	1,205	734	1,205	Likely this will be fully spent but just waiting for final refurbishment costs.
Travellers Sites - Bawburgh	Kevin Philcox		-	275	275	-	275	
Affordable Housing Land - Hethersett	George Denton		1,323	-	1,323	1,323	1,323	Have completed land acquisition.
Temporary Accommodation - Carbon Efficiency Works	Annie Somazzi		262	3	265	152	265	Expected to be fully spend as project end date is 31/3/24.
Supporting Individuals - Health and Leisure								
Disabled Facilities Grants	Kevin Philcox		1,000	243	1,243	1,116	1,243	-
Minor Improvement Grants	Kevin Philcox		-	30	30	-	-	This budget is an enabling budget to allow us to proceed with empty homes policy, rarely used.
Wymondham Leisure Centre Works	Dan Infanti		286	59	345	77	227	This may need to be amended as awaiting confirmation from lift company.
Long Stratton Egym	Rob Adams		110	-	110	107	107	Equipment now installed and project complete.

	Budget Manager	Provis ional	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
Diss Leisure Centre	Dan Infanti		137	-	137	55	55	Spend on hold because of the major refurbishment
Diss Leisure Centre Carbon Efficiency Works	Annie Somazzi		1,146	168	1,314	302	1,314	Expected to be fully spend as project end date is 31/3/24.
Diss Leisure Centre Poolside Improvements	Dan Infanti		800	-	800	131	250	Spend in 2023/24 profiled at £250,000 as main works will commence in 2024/25.
Long Stratton Leisure Centre	Dan Infanti		277	-110	167	128	160	
Ketts Park Works	Dan Infanti		15	-	15	18	18	
One Public Estate / Medical / Health Facilities	George Denton	Y	1,500	-	1,500	-	250	Build and Lease model being actively worked on with One Public Estate Stakeholders for the provision of new medical/ health facilities.
Land Assembly/Investment in Diss	Phil Courtier		1,500	-	1,500	1,474	1,500	Have completed land acquisition.
Help Outreach Vehicle	Kerrie Gallagher		-	-	-	49	49	Vehicle complete and delivered, funded by external grant.
Improvements in the Public Realm								
Street Lighting	Matthew Yates		24	132	156	-	45	Intent is to upgrade all SNC lights to LED within this financial year. No work has started on this project currently.
Play Area (works funded by S106 funds)	Petra Maryon		114	-	114	-	80	Full review undertaken, identifying two sites where new equipment is required and work completed by year end.
Queens Hill Community Park (GNGB Co-funded)	George Denton		153	-	153	6	153	Currently expecting to spend the full amount before year end.
Venta Icenorum (Caister St Edmond) (GNGB Co-funded)	George Denton		153	-	153	-	153	Currently expecting to spend the full amount before year end.

	Budget Manager	Provis ional	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
Cringleford Country Park (GNGB Co-funded)	George Denton		27	-	27	-	27	Currently expecting to spend the full amount before year end.
East Wymondham Green Infrastructure (GNGB funded)	Debra Baillie Murden		-	-	-	22	22	Consultant appointed, working towards agreeing a schedule of works. Expenditure funded by GNGB grant.
Changing Places (Disabled Public Conveniences)	Graham Peers		-	30	30	40	40	Works completed; accessible public convenience installed at Whitlingham Country Park; majority funded by external grant.
Opportunities Funding - Loddon Staithe Bridge Repairs	Petra Maryon		-	149	149	-	5	Currently working on scope of works.
Improvements in the Public Realm - Co- Investment								
Community Infrastructure Loan Fund / Larger Settlements Fund	George Denton	Y	100	1,000	1,100	-	-	Currently not anticipating spending this money.
Co-Investment Grant Fund	George Denton		1,000	500	1,500	-	1,500	Currently expecting to spend the full amount before year end.
Easton Village Hall (GNGB Co-funded)	George Denton		1,005	-	1,005	1,000	1,005	Currently expecting to spend the full amount before year end.
Protecting the Environment								
Electric Car Charging Points	David Disney		-	28	28	-	-	-
Environmental Projects	Annie Somazzi	Y	400	400	800	-	-	Budget not required in the current year.
Opportunities Funding -Electric Vehicle Charging Points	George Denton		-	50	50	100	100	Additional funding secured through Rural England Prosperity Fund. Capital swap request made and agreed.

	Budget Manager	Provis ional	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
Investment in the Economy								
Norwich Research Park Enterprise Zone Office (Fit Out)	Nina Cunningham		-	1,273	1,273	721	1,273	-
Norwich Research Park Buildings 2 & 3	Nina Cunningham	Y	8,000	-	8,000	-	-	Budget not required in the current year.
Property Development (Browick Road)	Nina Cunningham		3,000	-	3,000	-	-	Unlocking a strategic site. Loan will not be drawn down until Local Development Order is in place, possibly 24/25.
Hethel Infrastructure Project	Nina Cunningham	Y	2,015	580	2,595	85	85	Work continues to secure the necessary gap funding to allow the building design to commence.
Car Park Services Electric Vehicle	David Disney		50	-	50	-	-	-
Car Park Improvements	David Disney		35	91	126	-	-	-
Shared Prosperity Fund	Debra Baillie Murden		50	19	69	-	69	DLUHC have approved slippage of £19,059 from 2022/23 (received in 22/23). All funds must be spent in year.
Rural Prosperity Fund	Debra Baillie Murden		-	229	229	36	229	DEFRA have approved investment plan, funds expected shortly. All must be spent in year.
Colney Roundabout Contribution	Nina Cunningham		133	-	133	133	133	-
Our Own Needs								
South Norfolk House - Disposal	Neil Dyball		-	-	-	6	6	-
Horizon Centre	Neil Dyball		30	724	754	782	782	-
Horizon Centre - Public Sector Decarbonisation	Annie Somazzi		490	27	517	122	517	Expected to be fully spend as project end date is 31/3/24.
IT - Server and PC Replacement Programme	Angela Schug		261	58	319	147	318	Expenditure to date includes replacement laptops and audio-visual equipment.
IT – Infrastructure	Angela Schug		371	235	605	216	470	Expenditure to date includes firewall upgrades and server replacement

	Budget Manager	Provis ional	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
IT - Transformation Projects	Corinne Lawrie		225	374	599	250	373	Revenues/Benefits and Payroll systems projects will be completed by year end.
IT - WIFI - Horizon Centre	Angela Schug		-	218	218	90	218	-
IT - Remote Working Solution	Angela Schug		-	220	220	72	60	£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.
Wheeled Bins Purchase	Steve Williams		181	-	181	110	181	-
Waste Vehicles - Replacement Programme	Steve Williams		808	-	808	576	808	-
Grounds Maintenance Equipment	Steve Williams		65	-	65	49	65	-
Waste Depot	Simon Phelan/ Steve Williams	Y	6,500	-	6,500	-	70	Project delays in securing a suitable and affordable site option.
Opportunities Funding - Temporary Accommodation	Richard Dunsire		-	47	47	48	48	
Opportunities Funding - Leisure Centre Solar Panels	Rob Adams		-	419	419	8	419	Tender process now complete, planning permission being sought.
Opportunities Funding - Leisure Centre Solar Panels - Car Ports	Rob Adams		-	288	288	-	288	Tender process now complete, planning permission being sought.
Total Provisional Projects			25,515	2,280	27,795	85	405	
Total Approved Projects			27,191	5,789	32,980	10,239	17,667	
GRAND TOTAL			52,706	8,069	60,775	10,324	18,072	

Performance Dashboard Overview

3.24. 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	21
Amber	5
Red	3

Direction of Travel

Improving ↑	13
Static ↔	4
Declining ↓	12

Performance exceptions

Off target Measures: close monitoring

3.25. The following measures did not meet their targets and are at an unacceptable level of performance as well as having a declining direction of travel.

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>	1,924 (cumulative)	2,846 (cumulative)	1,549	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 922 from 1214 in the previous quarter. This is expected at 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 1549 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>	£26,347 (cumulative)	£45,734 (cumulative)	Significant Investment	Red	↓

Measure Owner: George Denton, Assistant Director – Economic Growth

- **Description of the performance this quarter:** : £9,830 has been secured as private sector funding to support the delivery of the Business Builder support programme. £9557 has been secured to deliver the outcomes of the Pride in Place programme supporting Wortwell community Centre and Bungay black dog running club
- **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 secure external funding to support the delivery of the Council's 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.
- **Potential Implications:** Exit interviews completion has risen again in Q3 to 85%
- **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>	54.39% (cumulative)	80.74% (cumulative)	98%	Amber	↓

Measure Owner: Rodney Fincham, Assistant Director – Finance

- **Description of the performance this quarter:** The collection rate for quarter 3 of 80.74% is 1.85% 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 3 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>	58.73% (cumulative)	82.22% (cumulative)	98%	Amber	↓

Measure Owner: Rodney Fincham, Assistant Director – Finance

- **Description of the performance this quarter:** The collection rate for quarter 3 of 82.22% is 2.52% below the quarter 3 performance in 22/23 but remains higher than Q3 in 20/21 & 22/23. A drop in collection was expected as we implemented the Civica Revenues Benefits system in December, which resulted in 3 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>Percentage of vacant retail space in market towns (Measure reference 12)</i>	10.33% (snapshot)	10.68% (snapshot)	Less than 8%	Amber	↓

Measure Owner: George Denton, Assistant Director – Economic Growth

- **Description of the performance this quarter:** There was a slight increase in vacant units in the market towns across South Norfolk during Q3. This represented a 0.35% increase in the vacancy rate on the previous quarter end. Across Q3 the net movement is that there are two more vacant retail units overall. Numbers of vacant units in each of Diss, Harleston and Wymondham are currently above pre-pandemic levels. The net shift during Q3 for each of these market towns is that there was one less vacant unit in Wymondham, one more in Diss and two more empty units in Harleston.
- **Potential Implications:** Note the improved situation in Wymondham and worsened situation in Harleston and Diss.
- **Action to be taken:** There has been a Wymondham Town Co-ordinator in post since January 2023 who is working with the retailers and town council to create a social media platform to engage with visitors and residents. Any potential shop owner will appreciate a coordinated offer for the town. The reopening of Wymondham Abbey and the Becketts Chapel as well as a relaunched programme of farmers markets has increased visitor numbers to Wymondham. Harleston and Diss Town Councils have more recently appointed dedicated town co-ordinators.

Off target measure: light touch monitoring

3.26. 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
<i>Customer satisfaction (Measure reference 2)</i>	61.14% (cumulative)	60.42% (cumulative)	65%	Amber	↓
<i>Percentage of food businesses with food hygiene ratings of rated 4 (good) and 5 (very good) (Measure reference 26)</i>	93% (average)	93% (average)	96%	Amber	↔

On target measures

Measure	Q2 Outturn	Q3 outturn	Target	Status	Direction of Travel
<i>Progress towards delivery of the predicted £8.6m savings through the South Norfolk/Broadland collaboration (Measure reference 1)</i>	£1,289,213 (cumulative)	£2,046,319 (cumulative)	£8.6m over 5 years	Green	↑
<i>Staff satisfaction survey (%) (Measure reference 3)</i>	67% (average)	70% (average)	Continual improvement	Green	↔
<i>Staff absence levels - working days lost to short term sickness (Measure reference 4)</i>	2.07 (cumulative)	3.17 (cumulative)	4.50	Green	↑
<i>Percentage of the organisations workforce who are apprentices and graduate entry roles (Measure reference 6)</i>	2.40% (average)	2.80% (average)	2.40%	Green	↑

Measure	Q2 Outturn	Q3 outturn	Target	Status	Direction of Travel
<i>Numbers of residents accessing support via the Help Hub (Measure reference 15)</i>	2908 (cumulative)	4509 (cumulative)	3,500	Green	↓
<i>Number of members across the 4 SNC leisure centre membership sites (Wyndham, Diss, Long Stratton and Framingham Earl) (Measure reference 16)</i>	3,952 (quarter end)	3,932 (quarter end)	3481	Green	↓
<i>Financial leisure recovery plan – bottom line cost to Council for leisure services (Measure reference 17)</i>	£318,787 (cumulative)	£356,700 (cumulative)	£901,000	Green	↑
<i>Number of residents supported to live independently (measure reference 18)</i>	77 (cumulative)	94 (cumulative)	100	Green	↓
<i>Delivery of housing standards enforcement (Measure reference 19)</i>	52 (cumulative)	67 (cumulative)	75	Green	↓
<i>Percentage successful intervention to prevent or relieve homelessness for customers who are homeless or at risk of becoming homeless (Measure reference 21)</i>	92% (average)	91% (average)	80%	Green	↓
<i>Number of working days taken to process new claims for Housing Benefit/Council Tax benefit (Measure reference 22)</i>	5 (average)	5 (average)	7	Green	↓
<i>Number of affordable homes delivered (including help to buy) (Measure reference 23)</i>	131 (cumulative)	225 (cumulative)	Sufficient housing	Green	↑
<i>Percentage of planning decisions made within statutory timescales – minors/others (Measure reference 25)</i>	91% (average)	91% (average)	80%	Green	↔
<i>Percentage of planning decisions made within statutory timescales – householders (Measure reference 25)</i>	94% (average)	95% (average)	80%	Green	↑
<i>Percentage of planning decisions made within statutory timescales – majors (Measure reference 25)</i>	100% (average)	100% (average)	80%	Green	↔
<i>Percentage of household waste recycled (Measure reference 28)</i>	47.45% (average)	n/a	2% increase	Green	↑
<i>Participation levels in household garden waste service (Measure reference 29)</i>	32,537 (end of quarter)	32,738 (end of quarter)	32200	Green	↑
<i>KGs of residual waste collected per household (Measure reference 30)</i>	235.02 (cumulative)	n/a	Decrease of 10Kgs	Green	↑
<i>Number of verified missed bins for all waste per 100,000 collections (Measure reference 31)</i>	18.8 (average)	18 (average)	30	Green	↑
<i>The number of litter picks / clean up initiatives supported (Measure reference 32)</i>	42 (cumulative)	47 (cumulative)	30	Green	↑

Measure	Q2 Outturn	Q3 outturn	Target	Status	Direction of Travel
Number of confirmed incidents of fly tipping (Measure reference 33)	429 (cumulative)	565 (cumulative)	1,000	Green	↑

Strategic Risk Dashboard

- 3.27. During Q3 23/24, CLT have reviewed and updated the Strategic Risk Register 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
- 3.28. 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 Finance, Resources, Audit and Governance Committee for review.
- 3.29. 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.
- 3.30. 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.
- 3.31. Since the risk register was last seen by the committee, no new strategic risks have been identified.
- 3.32. Two strategic risks have had their scores reduced this quarter. These are:
- SNCM11: 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.
 - SNCP3: 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 confirmed the introduction of weekly food waste collections from April 2026 and that Local Authorities can continue to charge for garden waste collections. The Government also have confirmed that the new Extended Producer Responsibility (EPR) payments have been deferred until October 2025 with other streams pushed back

until 2026 at the earliest. This has reduced the likelihood and impact scores of this risk.

3.33. 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				SNCP3 – Government's Waste Strategy (risk reduced)	SNCM12 – Cyber Attack (no change)
3	Likely				SNCM6 – Reform and Devolution (no change) SNCM11 – One Team Capacity and Capability (risk reduced) SNCGE1 – Leisure Memberships (no change) SNCSI2 – Energy costs and disruption (no change)	
2	Not Likely					SNCM1 – Financial (no change) SNCSI4 – housing demand (no change)
1	Rare					

4. Proposed action

4.1. Cabinet is asked to note 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 provides 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. Strategic risks are managed through our strategic risk register which is an appendix to this report.

7. Conclusion

7.1. The report has provided an overview of the position of the Council for performance, risk, and finance for Quarter 3 2023/24.

8. Recommendations

1. To endorse the revenue and capital position (variance details in Appendix 1).
2. To endorse the 2023/24 performance for Quarter 3 (detail 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 that an additional £95,000 be added to the list of additional works agreed at the South Norfolk Council meeting on 21st Feb 2024 to fund essential works to improve the current vehicle inspection facilities at Ketteringham Depot.

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	506	505	410	517	-12	Additional meeting room connectivity and Disability Discrimination Act compliance costs. Additional costs Local Government Association conference costs.
Chief of Staff	55	54	45	54	0	-
Governance	1,145	1,146	968	1,288	-142	Higher legal costs due to ongoing high profile legal cases estimated to be c£200k. £89k New burdens funding received to offset our running costs.
Electoral Services	65	65	403	80	-15	Additional costs for Association of Electoral Administrators polling staff training costs, polling cards and postal voting packs, offset by canvassing agency staff and remote registration cost savings.
Marketing & Comms	542	545	324	444	101	Savings due to lower advertising needs £40k. Vacancy savings are offset by income at risk and additional consultancy costs.
Internal Audit	63	64	-160	61	3	Savings on training and staff travel.
Human Resources	601	606	498	633	-27	Costs associated with dual system running costs as part of payroll migration and agency costs. Savings from job advertising expenses.
Apprentices	354	374	302	378	-4	-
	3,331	3,359	2,790	3,454	-95	

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	2,377	1,929	429	1,971	-42	Rise in insurance premiums (£15k) and bank charges (£20k)
Finance & Procurement	540	549	457	598	-49	Agency costs to cover Finance vacancy, and additional support for Financial Transactions Team due to volume of work.
Council Tax	393	414	639	509	-95	Agency costs to support system change and cover vacancies and a reduction in income from court summons.
Business Rates (NNDR)	-76	-72	109	-39	-33	Agency costs to support system change and cover vacancies
	3,235	2,820	1,635	3,039	-219	

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	1,729	1,739	1,472	1,838	-99	Higher 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 £129k.
Strategy and Transformation	488	491	338	420	71	Salary savings from transformation team restructure.
Customer Services	380	384	244	302	82	Salary savings from team vacancies
Facilities	469	473	627	844	-371	£230k holding cost for South Norfolk House largely attributed to Rates, insurance and utilities. £49K relates to utility costs for Cobb Lodge. There is a £30K recharge from Broadland Council for the period of dual occupation of Thorpe Lodge prior to moving the Horizon Building. A shortfall in income in relation to rental at the Horizon Centre is anticipated to be £26K.
	3,066	3,087	2,681	3,404	-317	

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	775	1,038	647	872	166	Lower staff costs, vacancy turnover and a post funded by an opportunity project.
Property	-486	-486	410	-376	-110	Increased business rates costs for Ella May Barnes building of £46k. Property management service level agreements under review and expected to cost £91k more than estimated. Reduced income for some business centres due to lower rents (vacancies) and higher electricity/maintenance costs.
Car Parking and Public Conveniences	-100	-95	-69	-104	9	Business Rates increase on Car Parks and increased maintenance costs offset by savings on salaries, lower income from parking permits, still awaiting EV income from new supplier
Community Assets	372	374	436	420	-46	Savings on salaries are offset by higher tree works and electricity supply costs. All major contracts under review with two out to tender for next year and two Service Level Agreements under review.
	561	831	1,424	812	19	

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	586	591	530	662	-71	Agency staff costs for the interim Environmental Protection Manager have been incurred. Additional costs have been incurred on sandbags due to recent storms.
Food Safety & Licensing	176	179	144	185	-6	Additional overtime costs have been incurred.
	761	770	674	847	-77	

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	879	894	338	732	162	Additional Pre-app, Government grant and Planning Performance Agreement income is anticipated at this point in time, offsetting lower than expected planning fee income. Additional costs have been incurred on agency staff to cover vacancies. Savings are anticipated in Planning Policy partnership and village cluster work costs. The budget for the Design Code preparation work is unlikely to be spent and will need to be carried forward to 24/25.
CIL	-83	-81	-107	-81	0	
Building Control (CNC)	-168	-141	-940	-193	52	The SNC element of CNC is showing an increase in income following the increase in the support recharge at the February 23 Board meeting.
Business Support	127	136	125	126	10	There are vacancies within the team which are unlikely to be filled in the short term. These savings are partially offset by lower Land Charge income caused by the downturn in the housing market.
	755	808	-584	584	224	

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
Communities & Help Hub	685	714	557	708	6	Household support fund admin fee, and IMA Grant provided additional staffing and resource.
Communities & Help Hub - EXT	0	22	-99	0	22	Funding confirmed to cover salary uplift.
Housing Standards & Independent Living	395	403	304	405	-2	-
Housing Standards & Independent Living - EXT	0	0	-12	0	0	-
Partnership & Innovation	69	71	54	71	0	-
Partnership & Innovation - EXT	0	0	-246	0	0	Actuals include Health and Wellbeing Partnership grants for 24/25.
People From Abroad Programme - EXT	0	4	-280	0	4	
Benefits & Housing	868	904	830	942	-38	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	-48	-48	21	42	-90	At the end of quarter 2, forecast spend on spot purchased accommodation was expected to exceed budget by £307k. Additional funding from the Homeless Prevention Grant (HPG) of £174k was transferred to offset the temporary accommodation costs (as permitted by the grant) for which the forecast has also been reduced to now show an overspend of approximately £218k. Therefore, the forecast overspend on temporary accommodation for year end at quarter 3 has been reduced from £299K to £56K.
Benefits & Housing - EXT	0	5	-24	22	-17	Increased Spot purchased accommodation for rough sleepers, as funding accounts for up to 7 rough sleepers being accommodated. Current figure is 17.
	1,969	2,075	1,105	2,190	-115	
Housing Benefit Payments	-250	-250	428	-250	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	776	787	716	843	-56	<p>There are two major areas of savings across the waste service. Fuel savings have been achieved as budgets set in September 22 were set high as a result of the Ukraine War, however price rises were not as severe as anticipated. Across the service, a saving of £236K has been achieved.</p> <p>Secondly, budgets included costs for an additional round, as recommended by the route optimisation consultants. However, through careful route management, the additional round has not yet been required, saving £80k. A further 30K has been saved from agency costs, by using fixed term contracts on the garden waste rounds for the peak periods.</p> <p>In addition, the commercial services have earned an additional £80k in income.</p> <p>Across all the services, vehicle fuel costs and salary costs have been realigned to reflect actual usage, resulting in savings in some areas and overspends in others.</p> <p>The variance in waste management costs is mostly attributable to salary regrades, maternity cover, and depot maintenance costs.</p>
Waste	2,154	2,203	1,362	1,921	282	<p>Variance is attributable to savings in fuel cost and realignment of vehicles between waste streams, additional income from bulky waste and commercial waste, new property bin sales and salary realignment between waste streams.</p>

Recyclable Waste	1,531	1,566	1,084	1,366	200	Variance is attributable to savings in fuel cost and realignment of vehicles and salary costs between waste streams, although an additional cost of £73k has been incurred as a result of the variable gate fee mechanism charge for 22/23.
Garden Waste	-1,929	-1,916	-1,910	-1,851	-65	Variance is attributable to salary realignments and fuel allocation between waste streams, an increase in disposal tonnage which is offset by increased recycling credits, and £30k lower income on garden waste subscriptions.
Food Waste	0	0	0	0	0	
Street Scene	538	551	423	536	15	Variance is attributable to fuel realignment between streams, offset by additional income.
Grounds Maintenance	95	109	157	99	10	Positive variance is attributable to additional income from South Norfolk Council work.
Recycling Strategy	67	69	75	114	-45	Within the Recycling Strategy team, additional Costs due to approved growth (Strategy Manager - approved cabinet Feb 23) and maternity costs (£17k) and additional Norfolk Waste Partnership costs (£19k). The disposal cost of glass has increased, with additional disposal costs of £9k.
	3,233	3,369	1,907	3,028	341	

Leisure 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
Diss Leisure Centre	177	177	117	201	-24	Income for general swim and vending higher than anticipated. Utility costs greater (£29k) than budgeted due to energy cost increases. Savings in salaries (£29k) due to Diss closure for renovations starting in Feb 24. Swim school negative variance £52k.
Fram Earl Leisure Centre	8	8	2	11	-3	
Long Stratton Leisure Centre	190	177	3	3	174	Income for memberships, café income and soft play equipment rental and soft play equipment rentals higher than anticipated. Utilities cost far greater (£34k) than anticipated.
Wymondham Leisure Centre	71	35	-99	-80	115	Income for memberships much higher than budgeted (£210k variance year to date). Utilities cost far greater (£111k) than anticipated which had a big impact on the forecast.
Ketts Park Centre	58	62	39	62	0	-
Leisure Community Development	0	5	22	22	-17	Grant payment of £22k for Active Norfolk that was not budgeted for.
Leisure Management	333	442	396	474	-32	Higher additional costs in consultancy, supplies and materials.
	837	906	480	693	213	

Appendix 2

South Norfolk Council – Delivery Measure Performance for Quarter 3 2023/24

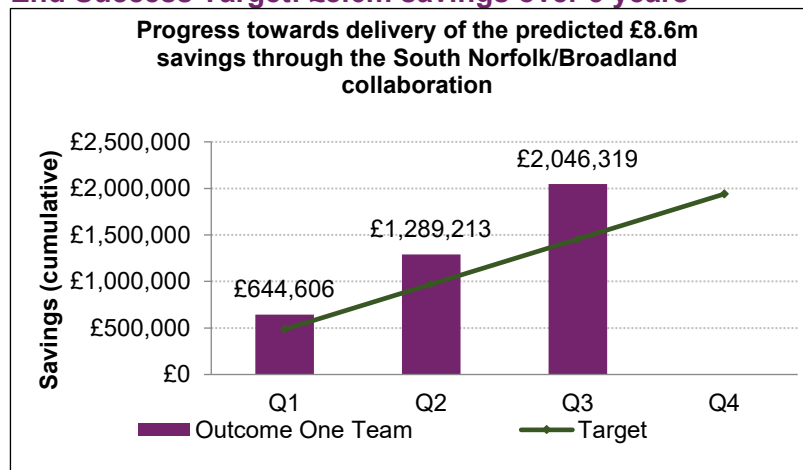
Appendix 2 provides a detailed overview of the performance of the Council against its Delivery Plan.



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: Richard Elliot

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.

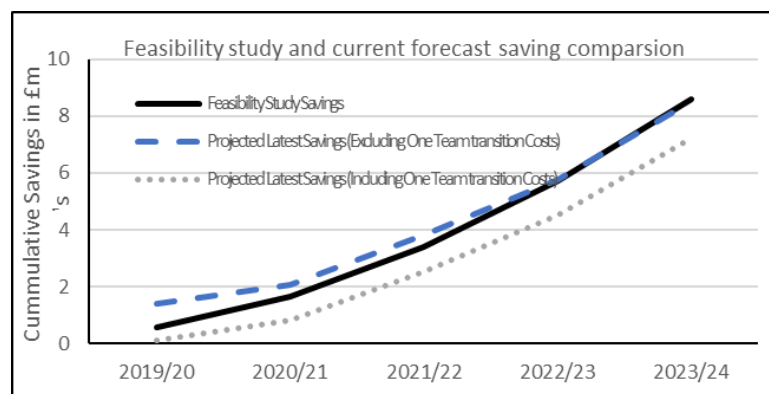
The current five-year saving forecast for the collaboration is £8.5m, this saving is split 45/55 (BDC/SNC). The figure net of one officer team transitional costs is £7.235m - One Team transitional costs were charged to the relevant Council.

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

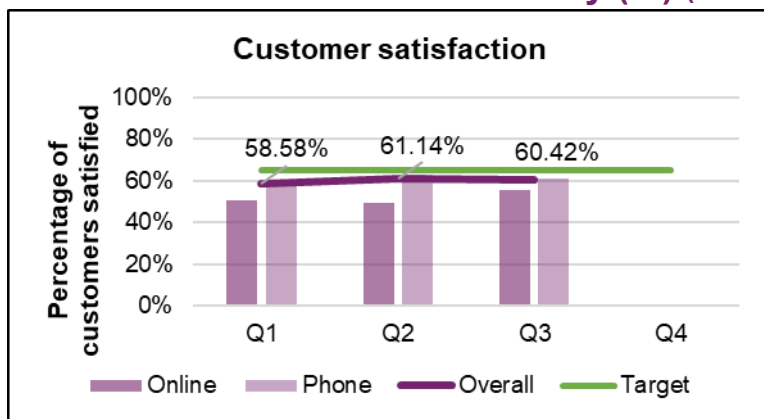


	2019/20 £'000	2020/21 £'000	2021/22 £'000	2022/23 £'000	2023/24 £'000
Senior Management	571	1,088	1,605	2,121	2,638
One Joint Officer Team	884	2,454	3,579	4,872	6,919
Contracts / Procurement	0	0	80	240	405
ICT Infrastructure Costs	0	-1,394	-1,394	-1,394	-1,394
Transition Costs	-69	-69	-69	-69	-69
	1,385	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

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



Customer satisfaction survey (%) (Measure reference 2)



Year End Success Target: 65%

COMMENTS

Measure Owner: Corinne Lawrie

Portfolio Holder: Cllr Daniel Elmer

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 the 384 responses received:

- 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 increase in our satisfaction levels on our online survey and 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 Richard Elliott

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 haven't experienced bullying, harassment or discrimination within the last year.
- 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.

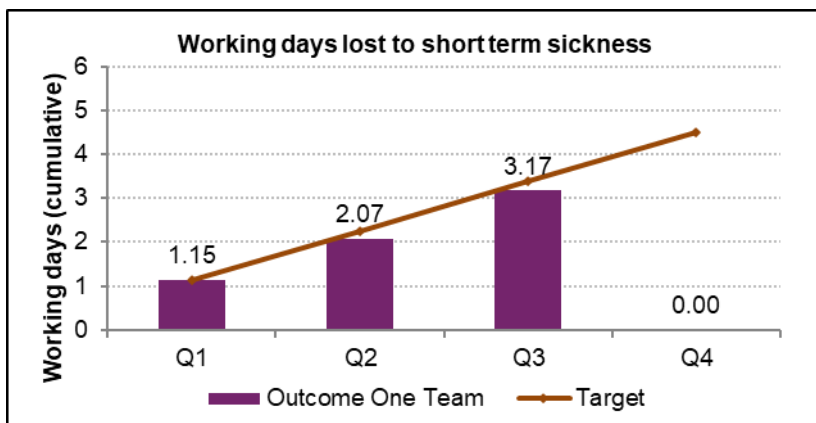
CONTEXT

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 Richard Elliott

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%.

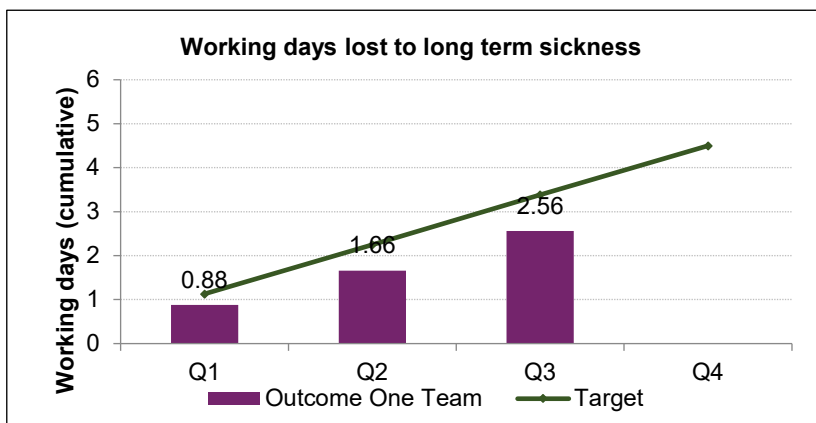
As mentioned in previous reports, Mental Health continues to be a key concern locally and nationally. Mental health UKs 2023 Annual report shows over a third of adults experienced high or extreme levels of pressure and stress always or often in the past year, the report warns that the UK is at risk of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

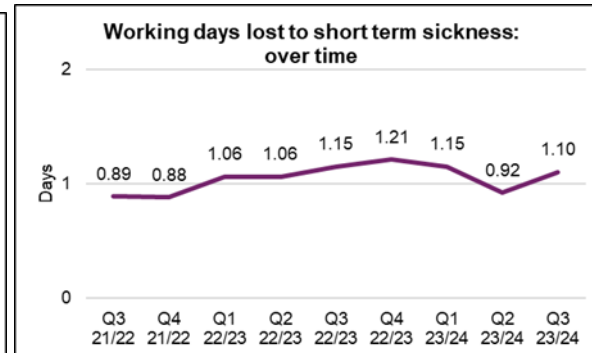
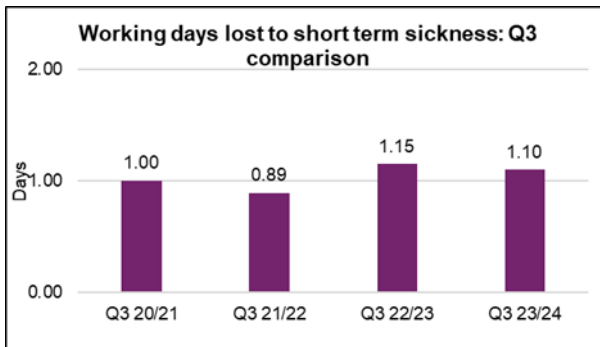
- Occupational Health Support
- Employee Assistance Programme
- Bespoke manager training
- Tailored mental health initiatives such as Lions Barbershop Initiatives
- Private counselling
- Private Menopause support via Spire Clinic
- Physio Support



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



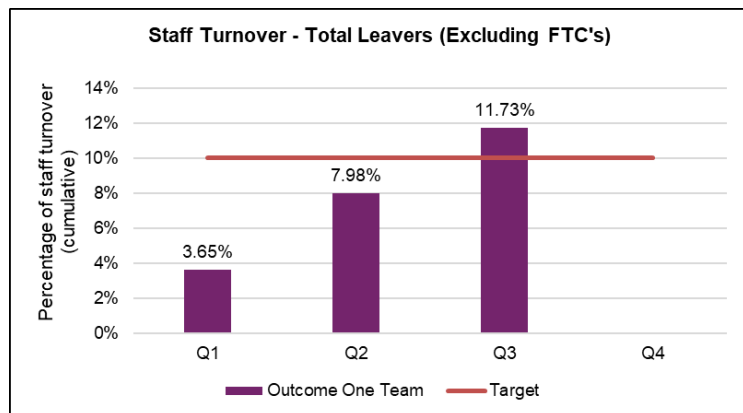
The national average sickness days lost per FTE in the UK sits at 7.8 according to CIPD, which gives reassurance that our own absence is relatively low and managed well.

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.



Staff retention (Measure reference 5)



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

COMMENTS

Measure Owner: Emma Hodds

Portfolio Holder: Cllr Richard Elliott

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

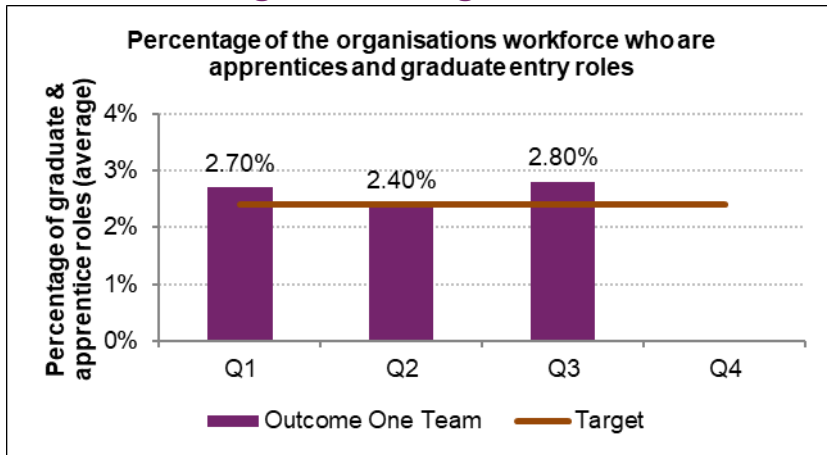
The risk being reduced service capabilities due to a reduction in staffing levels and/or difficulties in filling vacancies due to increased competition nationally. To mitigate this risk, more innovative places and methods of recruitment are being utilised, along with an improved induction process to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



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



COMMENTS

Measure Owner: Emma Hodds

Portfolio Holder: Cllr Richard Elliott

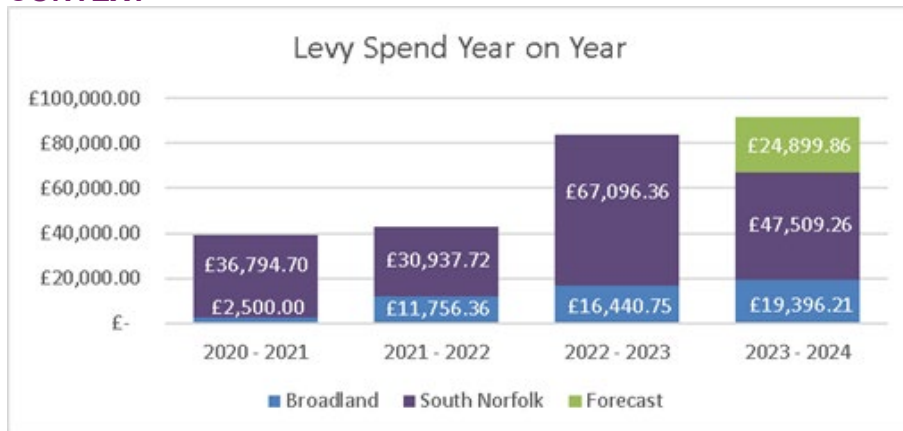
Description of the performance this quarter: For Q3, the percentage of the organisation's workforce in apprenticeships or graduate roles sits at 2.8% of the organisation headcount, that is 25 apprentices and 2 graduates. This figure is above our target, resulting in green RAG status and an increase from 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.

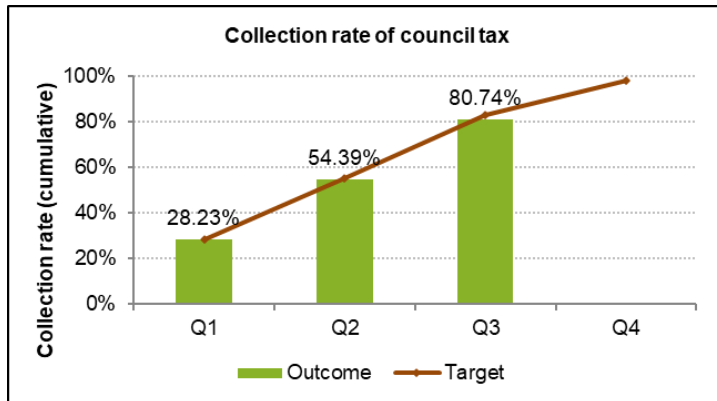
Forecasted remaining balance at year end:

- 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.



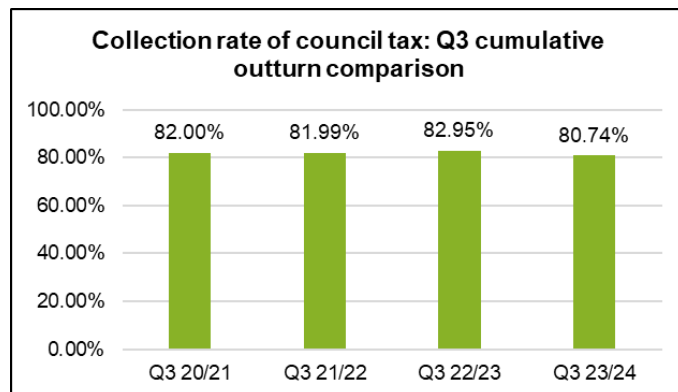
Collection rate of Council Tax (Measure reference 7)



Year End Success Target: 98%

RISKS

None this quarter.



COMMENTS

Measure Owner: Rodney Fincham

Portfolio Holder: Cllr Richard Elliott

Description of the performance this quarter: The collection rate for quarter 3 of 80.74% is 1.85% 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 3 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.

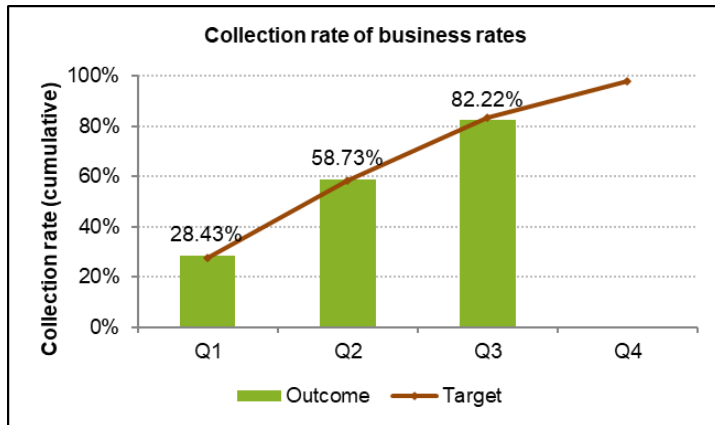
Action to be taken: We are working with the supplier to resolve issues, and the team are working extra hours to catch up with the work.

CONTEXT

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



Collection of Business Rates (Measure reference 8)



Year End Success Target: 98%

COMMENTS

Measure Owner: Rodney Fincham

Portfolio Holder: Cllr Richard Elliott

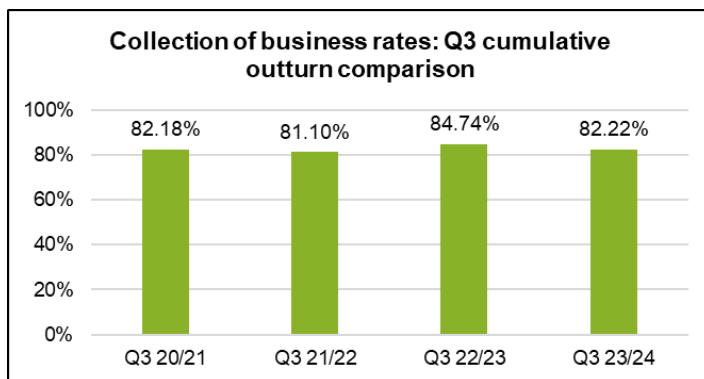
Description of the performance this quarter: The collection rate for quarter 3 of 82.22% is 2.52% below the quarter 3 performance in 22/23 but remains higher than Q3 in 20/21 & 22/23. A drop in collection was expected as we implemented the Civica Revenues Benefits system in December, which resulted in 3 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.

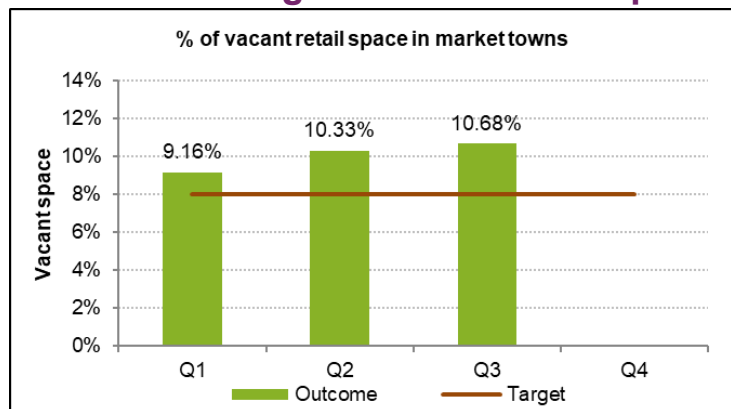


CONTEXT

The graph to the left shows performance compared to previous years.



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



Year End Success Target: Less than 8% vacancy

COMMENTS

Measure Owner: George Denton

Portfolio Holder: Cllr Lisa Overton-Neal

Description of the performance this quarter: There was a slight increase in vacant units in the market towns across South Norfolk during Q3. This represented a 0.35% increase in the vacancy rate on the previous quarter end. Overall retail unit vacancy rate across the 3 market towns of Diss, Harleston and Wymondham stood at 10.68% at the end of Q3.

Across Q3 the net movement is that there are two more vacant retail units overall. Numbers of vacant units in each of Diss, Harleston and Wymondham are currently above pre-pandemic levels. The net shift during Q3 for each of these market towns is that there was one less vacant unit in Wymondham, one more in Diss and two more empty units in Harleston.

Potential Implications: Note the improved situation in Wymondham and worsened situation in Harleston and Diss.

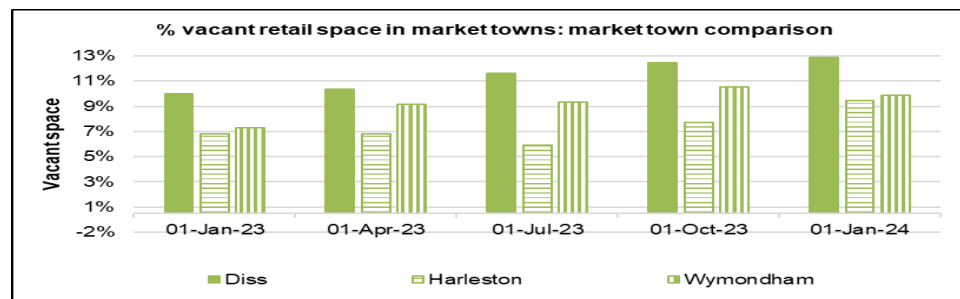
Action to be taken: There has been a Wymondham Town Co-ordinator in post since January 2023 who is working with the retailers and town council to create a social media platform to engage with visitors and residents. Any potential shop owner will appreciate a coordinated offer for the town. The reopening of Wymondham Abbey and the Becketts Chapel as well as a relaunched programme of farmers markets has increased visitor numbers to Wymondham. Harleston and Diss Town Councils have more recently appointed dedicated town co-ordinators.

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 that level in 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.

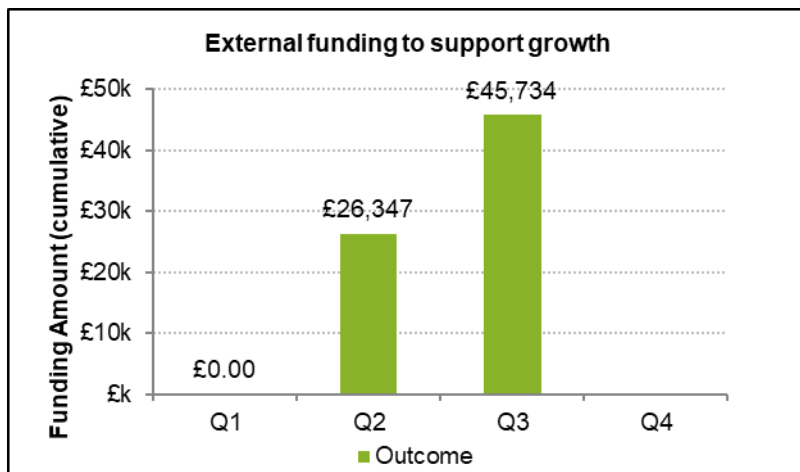
CONTEXT:

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 December 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.





External funding to support growth (Measure reference 14)



COMMENTS

Measure Owner: George Denton

Portfolio Holder: Cllr Lisa Overton-Neal

Description of the performance this quarter: £9,830 has been secured as private sector funding to support the delivery of the Business Builder support programme.

£9557 has been secured to deliver the outcomes of the Pride in Place programme supporting Wortwell community Centre and Bungay black dog running club.

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 secure external funding to support the delivery of the Council's Economic Strategy.

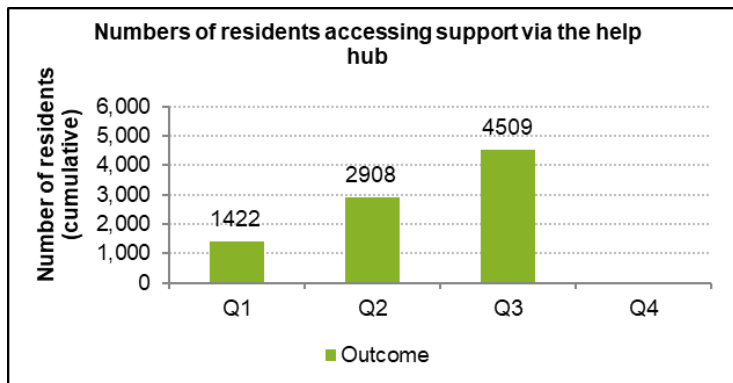
Year End Success Target: Significant investment to support the delivery of our key projects outlined in the Delivery Plan

RISKS

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



Numbers 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 Graham Minshull

Description of the performance this quarter: As expected demand on Help Hub services continues to increase. Led by increased public awareness of the service 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 Scrutiny.

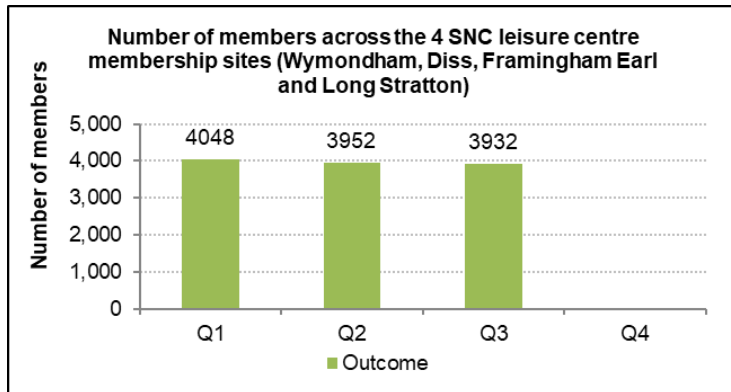
Action to be taken: Continue to track demand and local and national trends.

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.



Number of members across the 4 SNC leisure centres sites (Wymondham, Diss, Framingham Earl and Long Stratton) (Measure reference 16)



Year End Success Target: 3,481 live members

COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Kim Carsok

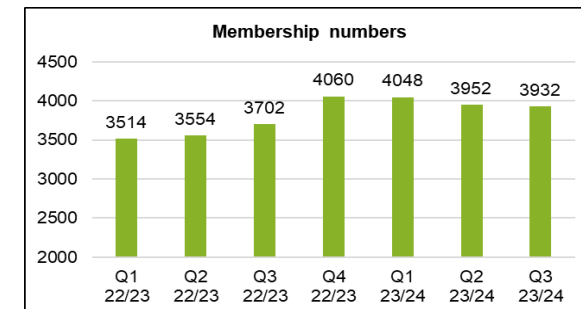
Description of the performance this quarter: Membership numbers remain strong at 3,932 even despite the announced impending closure of Diss for refurbishment in Feb 2024 which led to a reduction in their membership numbers by 42 members. The introduction of EGYM at both LSLC and WLC has enhanced the gym offering. The final quarter is traditionally a strong one for the service with new year joiners.

Potential Implications: The notification of the Diss closure has impacted on membership figures, alternative membership options have been given to all existing Diss users and some will continue to exercise at either WLC or LSLC, however the vast majority are likely to freeze or cancel their membership. Cost of living pressures could also have an impact on future business growth.

Action to be taken: Strong marketing campaigns planned for Q4. "Move more in 24" is the theme of the current campaign, this will run until the end of the financial year. The campaign highlights the benefits of exercise with the call to action of getting people to join the leisure centres and take advantage of the no joining fee promotion.

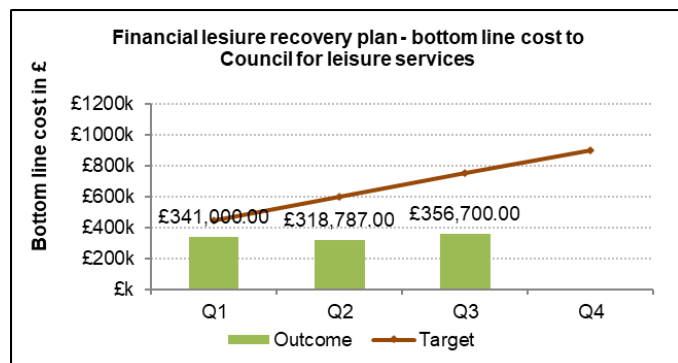
RISKS – The cost-of-living crisis will be a constant risk for the service in the short to medium term. Budget gym groups that offer single site and activity memberships are also a threat to those seeking highest possible value for money

CONTEXT – The leisure service is at the end of its third year of the covid recovery plan. Membership currently stands at 97.1% of pre covid figure which is a slight drop on Q2. A strong Q4 is expected, however, the memberships at Diss will significantly reduce when the centre closes mid-February.





Financial leisure recovery plan – bottom line cost to Council for leisure services (Measure reference 17)



Year End Success Target: £901,000

COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Kim Carsok

Description of the performance this quarter: The leisure service is experiencing an outstanding financial performance this quarter and year to date. The cost of providing the service to the Council currently stands at £356,700 which is £390,554 ahead of the budgeted year to date position. This is due to overall business growth and a very tight control on expenditure at the centre level.

Potential Implications: The situation at Diss will impact on the year end position. The centre closes on 11th February 2024, staff will be redeployed into other areas of the leisure business but a cost for this will still be incurred, and the income will drop significantly. The service is currently in the process of determining how many customers will continue as swim school learners and fitness members at alternate facilities. This will partially offset costs during the planned closure.

Action to be taken: A strong membership campaign is currently underway and will continue to the end of the financial year (this is explained in Measure Reference 16). Main hall capacity is currently a focus and the introduction of roller skating at both main centres, which are gaining in popularity, will bring in much needed casual income.

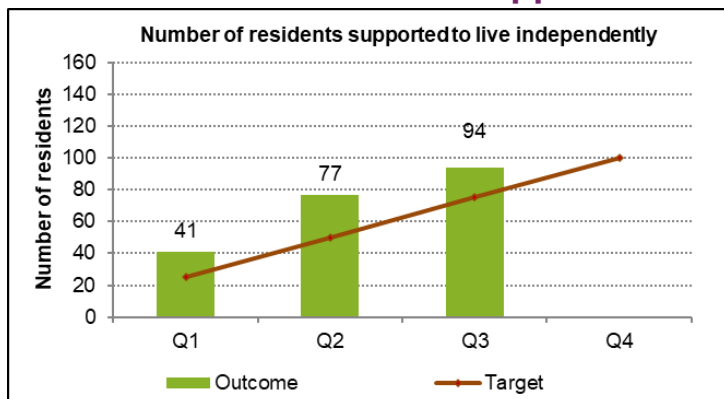
RISKS – Energy costs continue to be a significant threat as well as the cost-of-living pressures.

CONTEXT - Membership income continues to perform strongly, thanks in part to the changes around the VAT rules and the increases in the fees and charges from Q1. Tight budgetary control of the individual business units is a key factor in the reduced operating cost.

At the end of 2022/23 the bottom-line cost of the leisure service was £1,165,595. At the end of Q3 the cost is £356,700 against a current year-to-date budget position of £747,254. Considering the best position pre covid was a bottom-line cost of £454,863, the current position looks extremely strong.



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



Year End Success Target: 100 residents

COMMENTS

Measure Owner: Mike Pursehouse

Portfolio holder: Cllr Graham Minshull

Description of the performance this quarter: During Q3 of 2023/24, 32 Disabled Facility Grants (DFGs) and 3 additional grants have been completed. The Handyperson+ Service is now operational within the Housing Standards team and has completed 53 handyperson visits and 22 low level grants (LLGs) in this quarter, totalling 110 homes supported. These figures compare to 33 DFGs and 10 additional support grants in Q3 of 2022/23.

Potential Implications: By the end of December, our spend for the 2023/24 financial year totalled £1,116,293. Our budget through the Better Care Fund is £1,035,425, plus additional funding of £90,351 and a carry-over from previous underspend of £83,346. This gives us a total budget for 23/34 of £1,209,122.

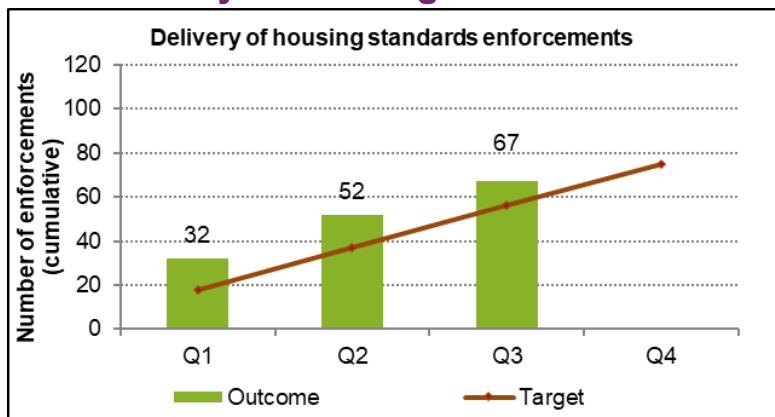
Action to be taken: To prevent overspend at the end of the financial year, the Housing Standards team is prioritising cases and controlling commitments while continuing to meet statutory requirements.

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.



Delivery of housing standards enforcement (Measure reference 19)



Year End Success Target: 75 enforcements

COMMENTS

Measure Owner: Mike Pursehouse

Portfolio holder: Cllr Graham Minshull

Description of the performance this quarter:

In Q3 of 2023/24, 15 disrepair complaints have been resolved, along with 2 occurrences of gypsies and travellers in the South Norfolk area. This compared to 21 disrepair cases and 1 report of travellers in Q2 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.

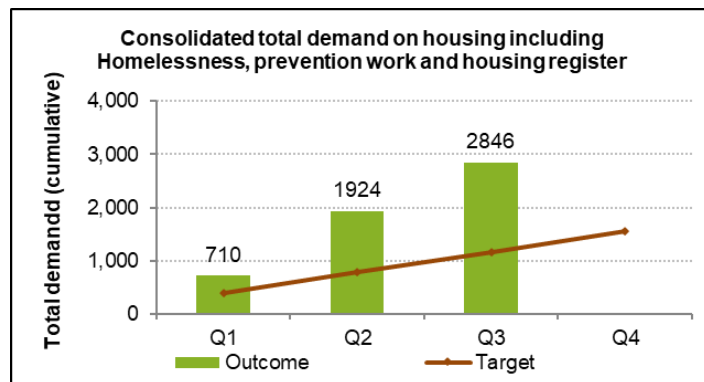
CONTEXT A key aim of the Council is to ensure that we deal appropriately with private sector landlords who rent their properties out, and to ensure that these properties are maintained to an acceptable standard. This work includes identifying, registering, and monitoring Houses of Multiple Occupation (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.



Consolidated total demand on housing including Homelessness prevention work and housing register

(Measure reference 20)



Year End Success Target: 1,549

COMMENTS

Measure Owner: Mike Pursehouse

Portfolio Holder: Cllr Graham Minshull

Description of the performance this quarter: Demand on the housing services remains high however this quarter did see a reduction in total demand to 922 from 1214 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 1549 as people continue to face a reducing private rental sector and household affordability issues.

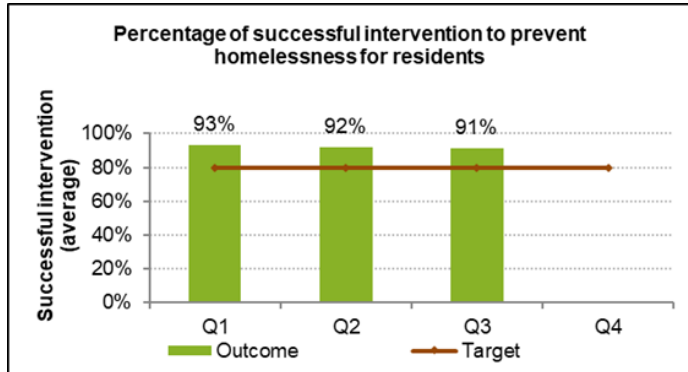
Potential Implications: The team is managing at present although the demand on the housing register for lower need remains a concern as those facing homelessness from private rental continue to face no other option than falling back upon the social rented sector thus reducing move on options for those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

Action to be taken: The team continues to perform very well. 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.

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



Year End Success Target: 80% successful interventions

COMMENTS

Measure Owner: Mike Pursehouse

Portfolio Holder: Cllr Graham Minshull

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 2846 people who have approach the team we have provided holistic support, guidance and proactive homeless prevention advice to make sure 2590 residents have not had to face the ordeal of losing their home. With the reduction in private rental there is an upturn in domestic abuse and family breakdowns which are incredibly hard to prevent. To prevent this for as many residents is an incredible achievement. To note these figures do not include overall approaches to the help hub which is a collective service whose primary focus is to prevent hardship to our residents, including housing concerns.

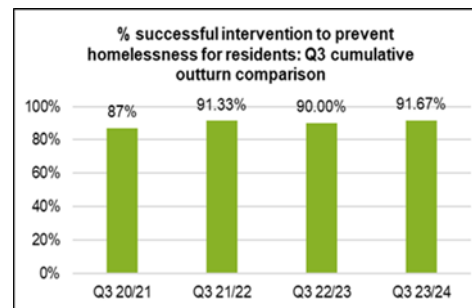
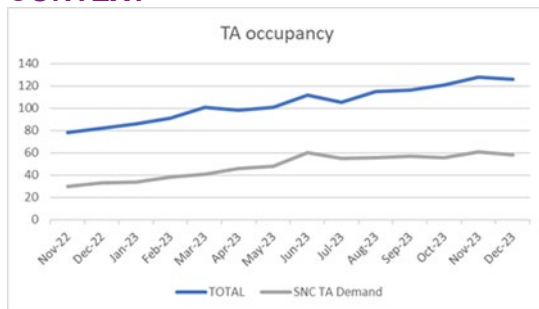
Potential Implications: This ethos must continue if we are to minimise the impact on temporary accommodation spend and potential growth of service. It is therefore encouraging to see such sustained service performance.

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

RISKS

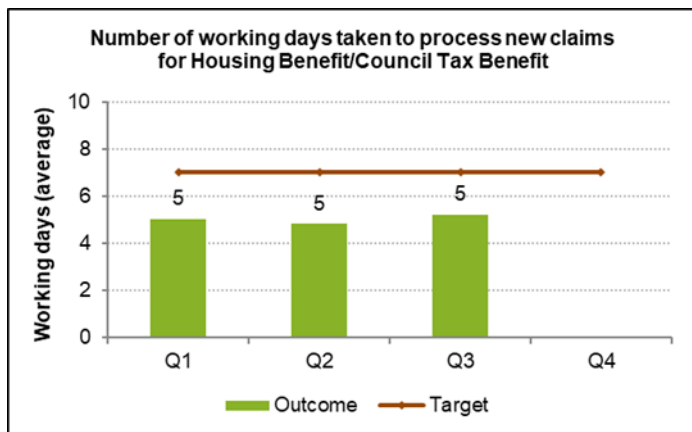
Asylum and Ukraine – Asylum remains a risk from a single homeless point of view, however we are seeking to address this concern by increasing the number of houses of multiple occupation that we can lease and relet to residents who have little or no other options. Due to the positive work of the Ukraine team demand from this cohort has reduced. **TA project delivery fails to meet targets** – At present this project is meeting all its aims and will be delivered on time.

CONTEXT





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 Graham Minshull

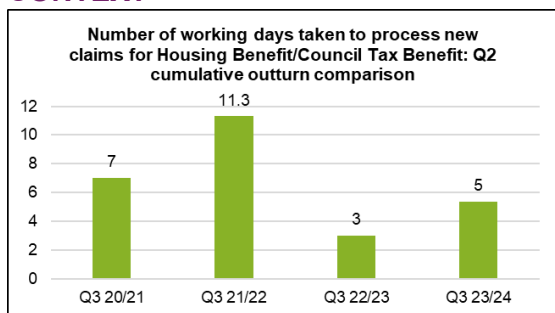
Description of the performance this quarter: Performance remained high for this quarter. The team during this period worked hard to bring the service completely up to date in preparation for the new system implementation. The upturn in days was due to this approach as all work items, no matter their 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 , as the new data system is embedded which will slow performance. 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 -

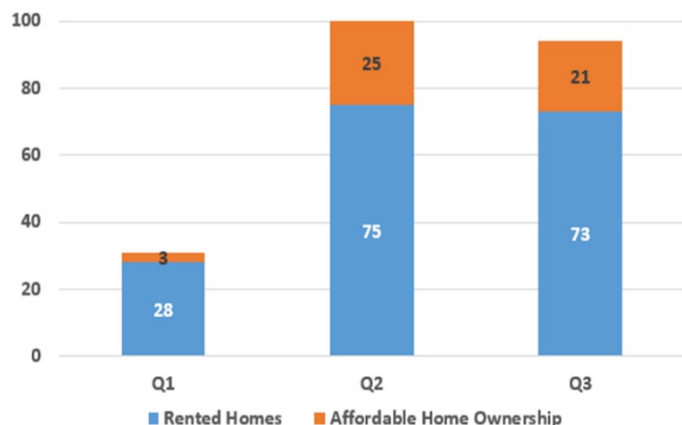


The graph to the left shows the performance compared to previous years.



Number of affordable homes delivered (Measure reference 23)

New Build Affordable Housing Completions
in each Quarter 2023



COMMENTS

Measure Owner: George Denton

Portfolio Holder: Cllr Graham Minshull

Description of the performance this quarter: 94 affordable homes were completed during this quarter, bringing the cumulative total to 225. The tenure split for Q3 was 73 homes for rent and 21 for affordable ownership. 57 of the homes were provided through s106 agreements with developers, with the other 37 being built or bought by housing associations. All were delivered in growth areas (Wymondham, Cringleford, Costessey and Easton).

Potential implications: : The number of affordable homes completed during 2023/24 (225) is already well in excess of the annual target (169). The final total is expected to be more than 250.

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

Year End Success Target: Sufficient affordable housing to meet the needs of residents in accordance with the Strategic Housing Market Assessment. The Local Housing Needs Assessment (HNA) for Central Norfolk (2021) indicates a yearly target of 169 new affordable homes for South Norfolk.

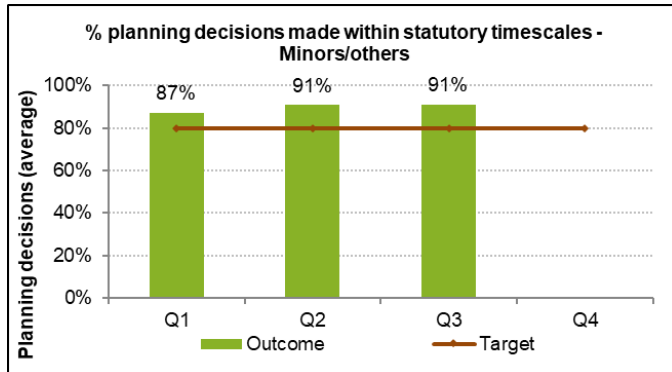
RISKS - Nutrient neutrality issues have not delayed the completion of affordable homes during 2023/24. Little impact is expected during 2024/25, although later years might be affected if site commencements are delayed.

CONTEXT

Higher mortgage interest rates have slowed open market sales. This has led to developers offering homes to housing associations, usually for shared ownership, increasing the supply of affordable homes during 2024. Now that interest rates have peaked, the market is likely to be more buoyant. If so, s106 completions should not be delayed.



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 Lisa Overton-Neal

Description of the performance this quarter: 91.7% of applications were determined in time (223 out of 243 applications) bringing the average for the year to date to 91%. 102 applications were determined in the statutory time period of 8 weeks and a further 121 were determined in an agreed extension of time. The national average for "Other" applications determined in 8 weeks or agreed time limit for Q3 in 2022 was 91%. 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 90.9 %, which against the national target of 70% is good, and as such the Authority is not at risk of special measures. "Other" applications include advertisement consent, Listed Building consent, Certificates of Lawfulness, etc

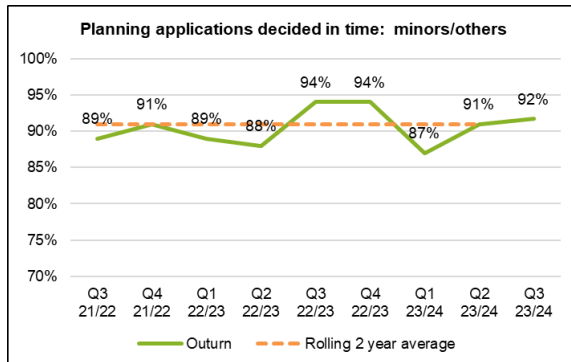
Potential Implications: None

Action to be taken: None

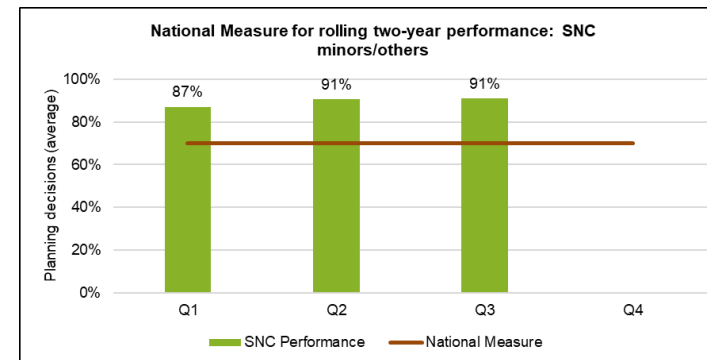
RISK

We are above our target of 80%. We are exceeding the national target of 70%, so there is currently no risk.

CONTEXT



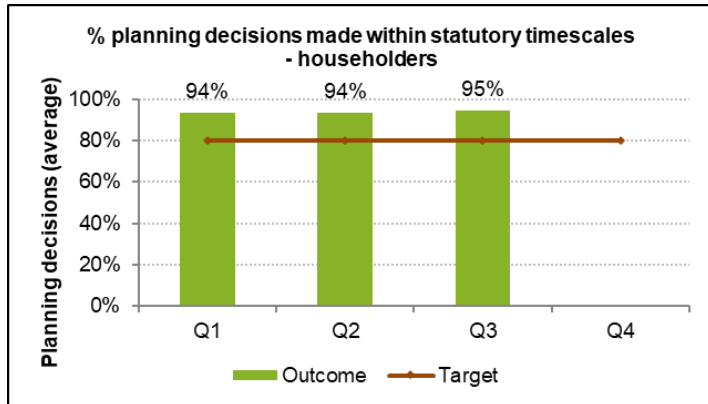
The graph above shows a comparison for previous quarters.



This graph above shows the 2-year rolling average



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



COMMENTS

Measure Owner: Helen Mellors

Portfolio Holder: Cllr Lisa Overton-Neal

Description of the performance this quarter: 96.9% of applications were determined in time (125 out of 129 applications) bringing the average for the year to date to 95%. 76 applications were determined in the statutory time period of 8 weeks and a further 49 were determined in an agreed extension of time. 22% were determined in 6 weeks or less.

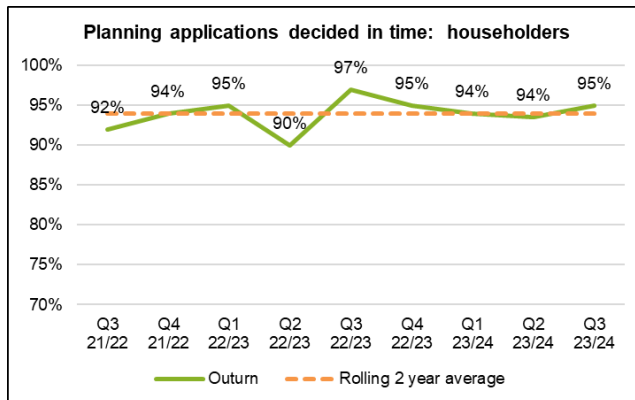
Potential Implications: None.

Action to be taken: None.

Year End Success Target: 80% of decisions

RISKS

We are exceeding our measure of success of 80%. The team continues to work hard to ensure extensions of time are agreed and we continue to employ additional resources to maintain and improve performance to ensure we meet targets.

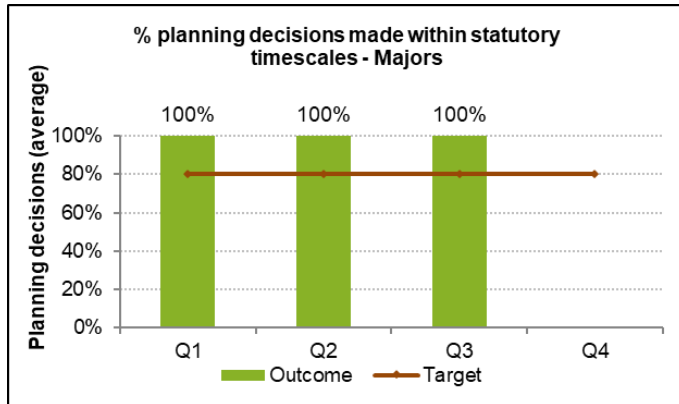


CONTEXT

The graph to the left shows planning applications: householders over time



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



Year End Success Target: 80% of decisions

COMMENTS

Measure Owner: Helen Mellors

Portfolio Holder: Cllr Lisa Overton-Neal

Description of the performance this quarter: 100% of applications were determined in time. 2 were determined within the statutory time limit and 8 were determined within 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 94.1%, which is against the national target of 60% means the Authority is not at risk of special measures.

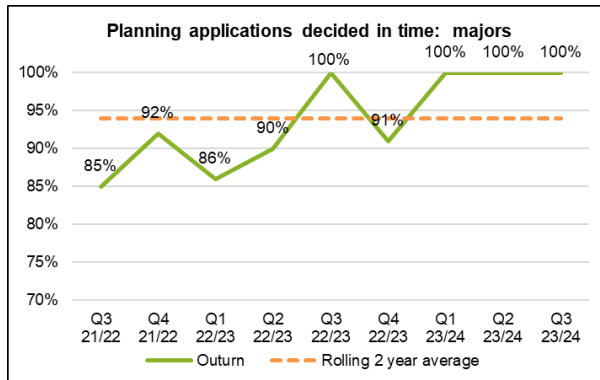
Potential Implications: None.

Action to be taken: None

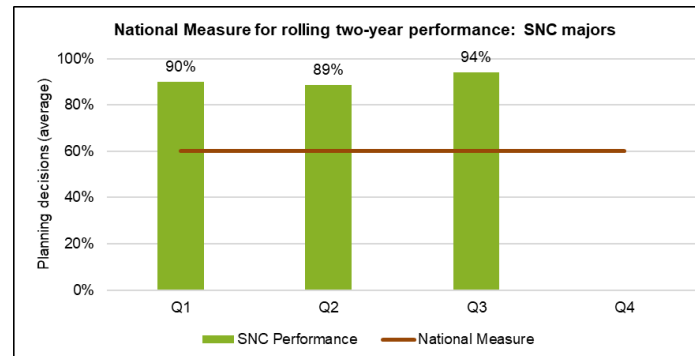
RISKS

We are above our internal measure of success of 80%. We are in excess of the national measure of 60% both for the quarter and the rolling two-year measure and as such, are not at risk of special measures. 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



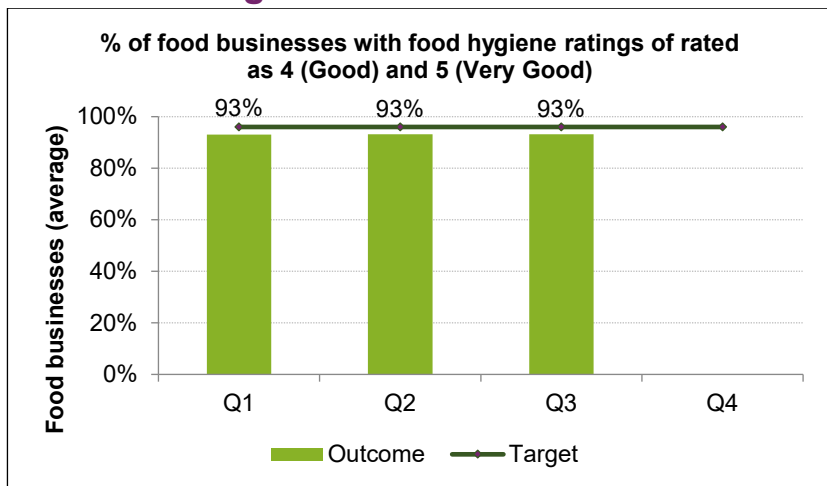
The graph above shows a comparison for previous quarters



The graph above shows the 2-year rolling average performance



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



Year End Success Target: 96%

COMMENTS

Measure Owner: Nick Howard

Portfolio Holder: Cllr Keith Kiddie

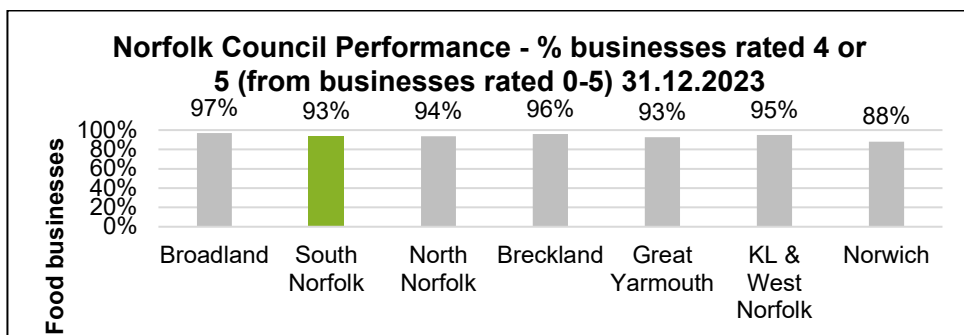
Description of the performance this quarter: This quarterly measure remains static, where 93.2% represents a total of 766 (5-rated) and 103 (4-rated) businesses respectively out of 932 food businesses within the Food Hygiene Rating Scheme in Q3. A total of 106 food safety interventions were carried out 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' now down to only 15 businesses (high performing).

Potential Implications: 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'.

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 South Norfolk 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.



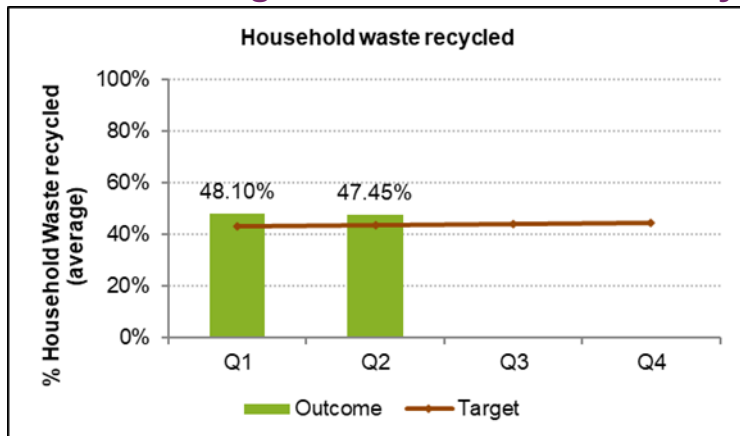
CONTEXT

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.



Percentage of household waste recycled (Measure reference 28)



COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Keith Kiddie

Description of the performance this quarter:

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

The total recycling rate in Q2 2023/24 was 46.8% which is a decrease of 1.3% from 48.1% recorded in Q1 2023/24. Further analysis of the data shows that the dry recycling rate increased by 0.68% whilst the composting rate (garden waste) decreased by 1.98% which reflects seasonal weather impacting on the volume of materials being collected, as the number of subscribers showed an increase over the period.

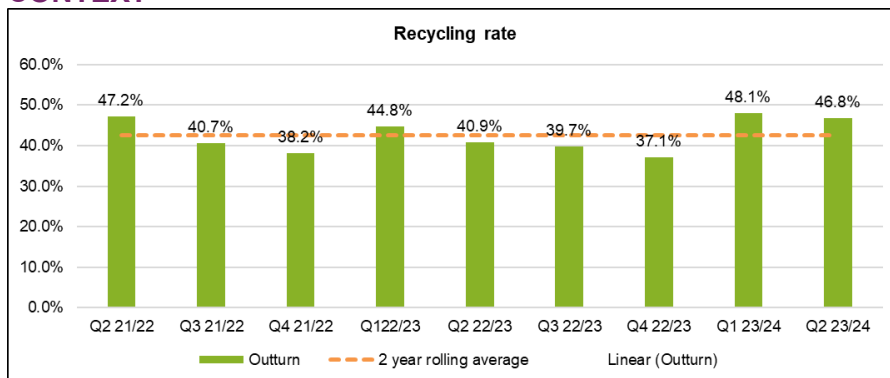
Potential Implications: Impact on overall year end recycling rate.

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

Year End Success Target: 2% increase against a baseline of 44.10% (Oflog Family Group Mean 44.95% 2021/22)

RISKS The key risk is 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

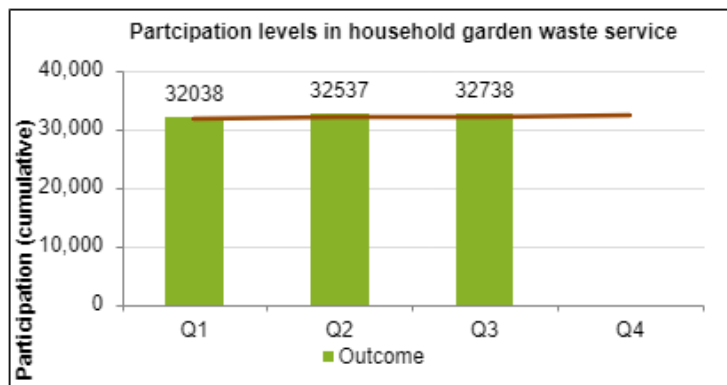


During Q2 the Council:

- Provided bin stickers/tags for communal bins – reminding residents what can and can't be recycled at home.
- Held a recycling event of small electrical items – WEEE Recycling event in Costessey (4th August at Breckland Hall).
- Arranged several recycling talks in the district (including Diss Advocacy Group in September).
- Free educational packs were provided to eight primary schools to encourage pupils and their families to reduce waste and promote recycling (Cringleford, Diss, Hethersett, Mulbarton, Poringland, Pulham, Rockland, Roydon).



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

COMMENTS

Owner: Simon Phelan

Portfolio Holder: Cllr Keith Kiddie

Benchmark set at 31,700 end of March 2023, with target being 32,200.

Description of the performance this quarter: The total number of subscribers to the garden waste collection service stood at 32,738 as of the end of Quarter 3 2023/24.

Potential Implications: Any reduction or stagnation in numbers would impact on overall year-end recycling rate and income received from garden waste subscriptions and recycling credits.

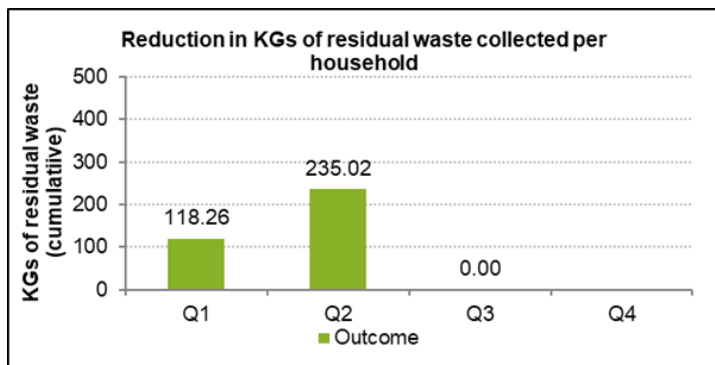
Action to be taken: The Council will continue to promote garden waste service to the residents to dispose the garden waste in an environmentally friendly way.

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



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



Year End Success Target: Decrease of 10KGs of residual waste collected per household. (Baseline set at 497.59 kg/hh/yr (Oflog Family Group Benchmark figure 2021/22))

COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Keith Kiddie

Description of the performance this quarter:

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

The total kgs of residual waste collected per household in Q2 2023/24 was 116.76 kg/hh compared to 118.26 kg/hh in Q1 2023/24. This is a decrease of 1.5 kg/hh (1.3%).

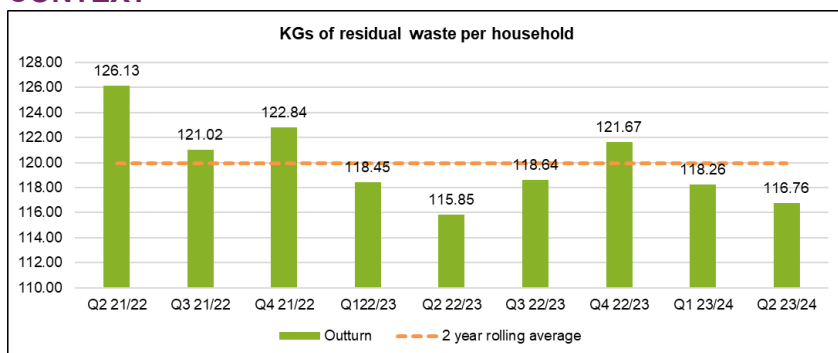
Potential Implications: Impact on overall year-end recycling rate.

Action to be taken: The Council will continue to support a range of recycling campaigns to reduce materials that could be recycled being placed in the residual waste bin, tackle contamination thus increasing the quality and quantity of recyclables collected.

RISKS

- Householder apathy to recycling overall, 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 -

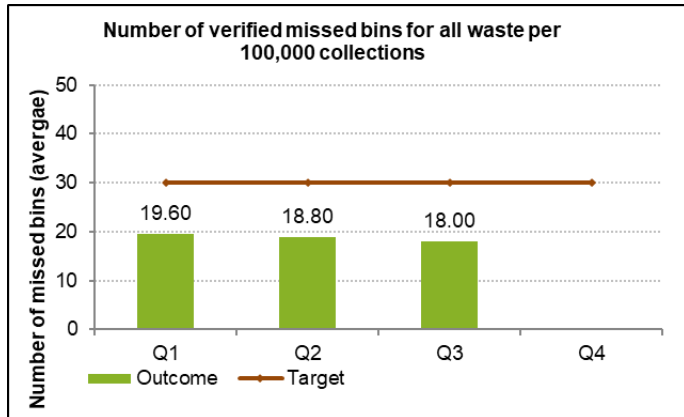


During Q2 the Council:

- Provided bin stickers/tags for communal bins – reminding residents what can and can't be recycled at home.
- Held a recycling event of small electrical items – WEEE Recycling event in Costessey (4th August at Breckland Hall).
- Arranged several recycling talks in the district (including Diss Advocacy Group in September) to eight primary schools to encourage pupils and their families to reduce waste and promote recycling (Cringleford, Diss, Hetherset, Mulbarton, Poringland, Pulham, Rockland, Roydon).



Number of verified missed bins for all waste per 100,000 collections (Measure reference 31)



Year End Success Target: Less than 30 justified missed bins per 100,000 collected

COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Keith Kiddie

Description of the performance this quarter: The SNC waste collection operation has continued to operate in an effective and efficient manner with justified missed bin performance improving in Q3. This performance improvement was mainly due to digital feedback from the In-Cab system highlighting that many bins were not placed out for collection at the prescribed time by residents.

Potential Implications: The waste collection rounds have been stable for some time; however, several garden waste bins were placed out for collection over the Christmas period despite the service being closed over this period.

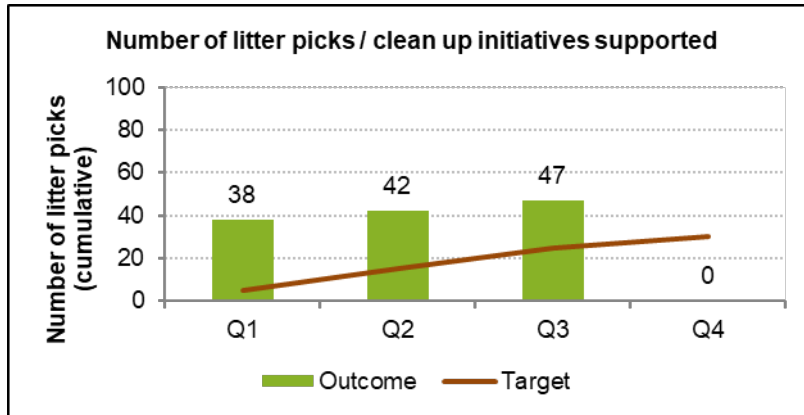
Action to be taken: All media streams including leaflets are utilised to highlight when the garden waste service closes over the Christmas period.

RISKS The requirement to introduce a domestic food waste service on 1 Apr 26 combined with ongoing domestic housing growth, within the district, has driven the requirement to find a replacement for Ketteringham Depot as there is insufficient space at the current site to allow development. Work is ongoing to provide options and costs to mitigate this risk.

CONTEXT The improved level of performance is testament to the hard work of the collection's crews and the logistical organisation at the Depot.



The number of litter picks / clean up initiatives supported (Measure reference 32)



Year End Success Target: 30 litter picks/clean up initiatives

COMMENTS

Measure Owner: Simon Phelan

Portfolio Holder: Cllr Keith Kiddie

Description of the performance this quarter: 5 litter pick events were supported in Q3. This is 1 more than Q2, but still low which is to be expected at this time of year, and outside of the Big South Norfolk Litter Pick scheme. We continue to support groups wanting to litter pick all year round.

Potential Implications: Many groups have their own equipment, so will not require further support from the Council. Therefore, there are likely more litter picks happening, but we have not been requested to support.

Action to be taken: Consider offering more groups their own litter picking equipment utilising Pride in Place funding.

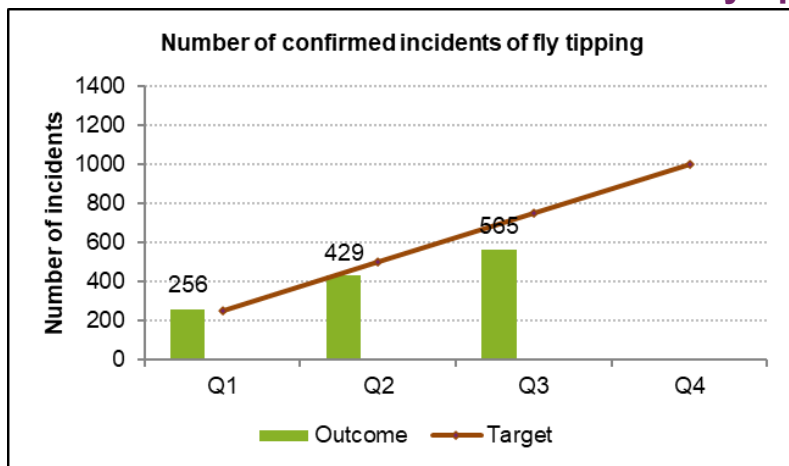
RISKS

- Weather - Wetter cooler weather may discourage volunteers from taking part.
- Financial pressures – Apathy towards volunteering during a cost-of-living crisis leading residents to prioritise their time, effort and how they spend their money.

CONTEXT The dates for The Big South Norfolk Litter Pick scheme are timed to coincide with the Great British Spring Clean scheme run by Keep Britain Tidy. In 2023 this took place from March 17 to April 2, 2023. According to Keep Britain Tidy, the Great British Spring Clean 2023 saw over 400,000 bags collected in the UK.



Number of confirmed incidents of fly tipping (Measure reference 33)



COMMENTS

Measure Owner: Nick Howard

Portfolio Holder: Cllr Keith Kiddie

Description of the performance this quarter: 136 incidents this quarter, a slight reduction from the same quarter last year and remaining below target for the year which is favourable.

Potential Implications: Quarterly numbers vary seasonally and they can vary for other reasons. With ongoing attention on fly tipping deterrence and enforcement, officers will maintain the focus on driving down numbers of incidents across South Norfolk.

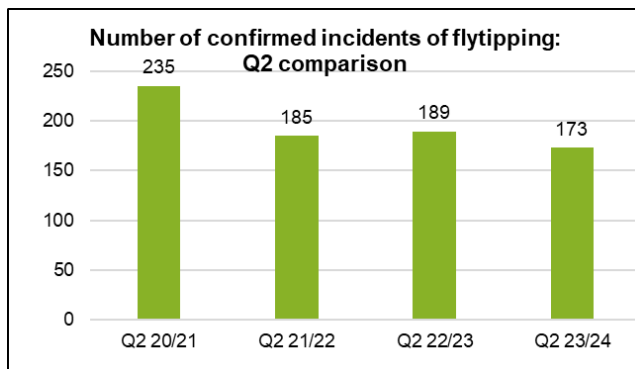
Action to be taken:

The Council's environmental enforcement officer is coordinating across all departments in order to establish full and clear reporting, recording, responses and partner / stakeholder engagement to prevent and detect fly-tipping.

Year End Success Target: No more than 1,000

RISKS

Underlying causes of fly tipping and an analysis of fly tipping incident data are being explored to inform preventative, compliance and enforcement strategies. Positive community and stakeholder engagement work also has the potential to encourage quicker or greater reporting of incidents. There is potential for the cost of living crisis to lead to increased environmental offending, although the present reported result in isolation does not confirm this.



CONTEXT

Previous year data is shown in the graph.

Appendix 3
South Norfolk Council – Strategic Risk Register
Last reviewed – January 2024



South Norfolk 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 strategic risk register 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
SNCM1							
SNCM6							
SNCM11	x		x	x			Risk score reduced. Mitigating action completed (mitigation 8) New mitigating action added (mitigation 10).
SNCGE1							
SNCM12				x			New mitigating action added (mitigation 9)
SNCSI2							
SNCSI4							
SNCP3	x		x				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	SNCM1	<p>Risk - Financial - The Council fails to anticipate and respond to large scale changes in the external environment that impacts on our ability to deliver our MTFP.</p> <p>Consequence - A negative impact on the Council's finances, either from reductions in income or funding, or from increased cost pressures.</p>	<p>Medium Term Financial Plan (MTFP) 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"> 1. Lobby government for adequate funding, acknowledging impact on costs & demand of cost of living rises. 2. Respond to Government Consultations to ensure any potential impact on the Council finances is conveyed to Government. 3. Feed into any relevant networks e.g. LGA and DCN to influence policy creation. 4. Ensure local MP's are aware of the Council financial position and potential impact of any forthcoming Government policies as part of the regular MP briefings. 5. Continued regular horizon scanning and policy updates to CLT and management team to ensure we stay abreast 	Assistant Director Finance	Cllr Richard Elliott	<ol style="list-style-type: none"> 1. Prior to Autumn budget 2. As appropriate when consultations open 3. As Appropriate 4. At regular MP Briefings 5. Monthly 6. 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"> 1. Requirement to continue to lobby for a multi-year settlement in future and recognition that cost of living rise will squeeze council budgets as both costs and demand for services increase. 2. As appropriate when consultations open. 3. As Appropriate. 4. At regular MP Briefings. 5. Monthly horizon scanning and policy reports are developed for CLT. 6. 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
								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	SNCM6	<p>Risk - The Council fails to take advantage and act quickly and proactively on the opportunities of Local Government Reform and devolution.</p> <p>Consequence - Failure to achieve potential for greater devolved funding and/or decision making to the region and the benefits this would bring for residents and businesses in our area.</p>	<p>Regular Horizon Scanning.</p> <p>Active Membership of different groups such as the DCN, LGA, RSN 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 central Government departments and professional bodies.</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 policy issues and the implications for our residents.</p> <p>4. Work with our partners where appropriate to present a collaborative response to political changes.</p> <p>5. Respond to the Deal for Norfolk consultation (completed)</p>	Director of Resources	Cllr John Fuller	<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
Moving with the times, working smartly and collaboratively	SNCM11	<p>Risk - Capability and capacity does not meet organisational requirements.</p> <p>Consequence - Poor standards of service delivery, service disruption, slow or minimal transformation and inability to meet savings targets as a result. This could also lead to budget underspends if the lack of capacity leads to projects being delayed.</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 BAU 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 in the pipeline and resource for delivery</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 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</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 Daniel Elmer	<p>1. Throughout the Delivery Plan period (2020-2024)</p> <p>2 and 3. 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 complete - now BAU</p> <p>5. The portfolio approach has been established for transformation governance providing greater viability over project and programme delivery and is being rolled out to other portfolios.</p> <p>6. Ongoing, now BAU</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
								monitoring of key projects. 6. Delivery of agile working approach and cultural shift to better attract and retain talent. 7. Local authority benchmarking across the region and wider to ensure pay and benefits on a role specific basis remain comparable and competitive. 8. Track and monitor external Project 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 portfolio approach defined and implemented by Q1 24/25 10. Further integrate the budget setting and planning process with a								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 more timely, we can then look to pick up the benchmarking again. 8. Action complete – now BAU 9. Transformation portfolio is in operation, the final portfolio and its underpinning boards are currently being finalised 10. In progress

						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
								clear view to aligned resource and initiatives with must do activities outlined.								
Growing the Economy/ Supporting individuals and empowering communities	SNCGE1	<p>Risk – The Council is unable to maintain memberships and income levels at its Leisure Centres as a consequence of Covid-19 and increased costs of living.</p> <p>Consequence – Membership levels decrease. Expenditure levels exceed income levels and the commercial viability of the service decreases.</p>	<p>Detailed Covid-19 procedures in place</p> <p>Regular contact with existing members</p> <p>Marketing campaigns to increase membership</p> <p>Review of existing member offer and pricing structures</p> <p>Budget monitoring</p>	4	5	20	Reduce	<p>1. Provide a range of incentives to encourage existing and new members to return</p> <p>2. Delivery of the savings through reduced staff resources and utility costs</p> <p>3. Look for further income generating opportunities and review of membership offer</p>	Assistant Director Community Services	Cllr Kim Carsok	All timelines are inline with the Leisure Recovery Plan to March 2024 1. Ongoing 2. Ongoing 3. Ongoing	3	4	12	No	<p>No change to the risk score</p> <p>1 and 3 - The service continues to provide a range of incentives, marketing campaigns and launched a new website, the service now has a dedicated marketing officer.</p> <p>2. The increase in utility costs, particularly electricity has continued to have a negative impact upon expenditure. The decision by HMRC to allow Public Leisure Services to retain VAT on certain products has had a positive impact on income which remains ahead of budget.</p> <p>3. The Business case for improvements to Diss Pool was approved by Cabinet on 5th September with work anticipated to start in Jan/Feb 2024 in conjunction with PSDS funded improvements.</p>
Moving with the times, working smartly and collaboratively	SNCM12	Risk - National Cyber Security Centre has advised of a heightened cyber	<p>Geo-blocking of traffic originating from black-listed countries.</p> <p>Timely application of</p>	5	5	25	Reduce	1. Ensure the effectiveness of the Controls - commission a third-party review	Assistant Director ICT/Digital and Transformation	Cllr Daniel Elmer	1. Ongoing, annual requirement. 2. Ongoing 3. Ongoing	4	5	20	No	<p>No change to risk score</p> <p>1. Cyber Assessment Framework is underway now due for</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
		<p>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.</p> <p>Consequence - A successful cyber-attack could render the ICT infrastructure and line of business systems unusable for a protracted period of time, significantly impacting the Council's ability to deliver statutory services and result in a significant financial impact to the business.</p>	<p>security updates to all software and firmware</p> <p>Ensuring Anti-Virus software updated and functioning</p> <p>Monitoring of adherence to security policy ensuring there are no exceptions</p> <p>Ringfenced £125,000 from the Future Councils funding to dedicate to improving our approach to cyber security and to implementing the actions resulting from the Cyber Assessment Framework.</p>					<p>of the Council's security posture.</p> <p>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 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 controls 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</p>			<p>4. Ongoing</p> <p>5. Ongoing requirement</p> <p>6. Roll out expected Sep/Oct 23</p> <p>7. Recommendation output expected December 2024</p> <p>8. Implementation 23/24 from Q4</p> <p>9. Q1 24/25</p>					<p>December completion</p> <p>2. CISO role recruited this action is complete the review of monitoring tool is underway and will be part of action 8.</p> <p>3. No update this will be a direct output of the CAF</p> <p>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 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</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
								making it an annual requirement delivered to all Council staff and members to improve the organisations Cyber security culture. 7. Undertake the NCSC 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								timescale of the outputs of this report. The roll out of this will be delayed coinciding with receipt of the CAF results expected December 8. As above - action 7 9. In progress

Supporting individuals and empowering communities/ Growing the Economy	SNCSI2	<p>Risk – Increasing energy costs for leisure and depot, plus unsecure or disruption to supply of fuel (gas/diesel/HVO)</p> <p>Consequence – Increase costs of operating the facilities and risk to be able to deliver the waste operations</p>	Energy supplies purchased through ESPO framework agreements and established relationship with fuel supplier	4	4	16	Reduce	<ol style="list-style-type: none"> 1. Purchase of 31K litre storage tank at depot 200% increase in fuel storage – 5/6 weeks supply (completed) 2. Diversification of fuel types being used in vehicles to include HVO 3. Regular discussion with suppliers to understand current position in market, availability and costs 4. Develop contingencies to be able to transport staff into depot if there are fuel shortages 5. Investigating installation of PCVs on roofs of leisure centres to reduce reliance upon external electricity supplies 6. Apply for Sport England to undertake an energy survey to identify areas of improvement where efficiencies can be made. 	Assistant Director Community Services	Cllr Kim Carsok and Cllr Keith Kiddie	<ol style="list-style-type: none"> 1. March 2022 (completed) 2. Ongoing 3. Ongoing 4. Ongoing 5. Ongoing - survey completed, procurement commencing, estimated delivery by the end of the calendar year 6. October 2023 	3	4	12	No	<p>No change to risk score</p> <ol style="list-style-type: none"> 1. Mitigation completed. 2. HVO mix being used in vehicles 3. Ongoing, but supply position is now stable 4. Contingency options developed and being kept under review 5. Revised tender for installation of PVs and batteries on Wymondham and Long Stratton LC's now being evaluated with work expected to commence Oct/Nov 2023 6. A Sport England funded energy efficiency survey of all the centres has been completed and identified actions that can be undertaken to further approve efficiencies, these are now being worked through.
Supporting individuals and empowering communities	SNCSI4	Risk - There is insufficient affordable private housing and insufficient social housing stock to meet the demand on the Council,	<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>	4	5	20	Reduce	<ol style="list-style-type: none"> 1. Maintain current staff resource levels, which is being worked through in customer journey report. 2. Additional 	Assistant Director of Individuals and Families	Cllr Graham Minshull	<ol style="list-style-type: none"> 1. Staff resource in place until 2024 2. In place from Oct 2022 (completed) 	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</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
		and temporary accommodation Consequence - Unable to provide a housing throughput which results in blockages to temporary accommodation. This will result in increased costs and poorer outcomes for vulnerable residents. This will also have an impact on our partners and the wider system such as care leaver and the system will rapidly become silted up.	Current team resources in place and funded. Ukraine and cost of living programmes establishment and working well Housing enablement partnership in place to consider options to increase additional stock.					<p>funding to provide temporary accommodation to ensure adequate emergency options are available to residents (completed)</p> <p>3. TA review looking at future housing options including buying more property which will offset longer term costs. (completed)</p> <p>4. More strategic approach to future housing strategy and delivery, including confidence to explore new and different options.</p> <p>5. Manage housing register more closely to reflect reality and demand alongside support.</p> <p>6. Long term move on plan for Ukraine residents in place.</p> <p>7. Cost of living demand monitored.</p> <p>8. Purchase of LAHF properties</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>					understand the future needs of residents to inform policy.

						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
								(potential risk that available properties does not meet Govt funding timelines)								
Protecting and improving our natural and built environment, whilst maximising quality of life / Growing the Economy	SNCP3	<p>Risk - Implications arising from the Government's Resources and Waste Strategy and Environment Act 2021</p> <p>Consequence - Requirement for significant changes to service delivery and the need for a replacement Depot, increased costs and loss of income</p>	<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.</p> <p>Officers continue to attend Defra Webinars and are undertaking scenario planning.</p>	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 	Assistant Director Community Services	Cllr Keith Kiddie	1 - 7 Ongoing	5	4	16	No	<p>Risk Reduced</p> <p>1-6 Officers continue to attend Defra workshops on the proposals. All information on Waste Data Flow has been updated and a benchmarking exercise has been undertaken for the Council by WRAP.</p> <p>7. The Council is now working with NCC to review options for realigning current operations at the two Depots at Ketteringham with the aim of improved usage of both sites.</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
								implications. 7. Lack of space and infrastructure at existing depot affecting the ability to provide a safe and compliant service								

De-escalated/closed risks in 23/24

Risk Ref	Reason risk was de-escalated/closed	Quarter risk was de-escalated/closed
SNCP2 - The inability to find Gypsy and 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

SNCP1 - 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
SNCM9 - The Council is unable to take advantage of the benefits and opportunities from collaborative working with Broadland District 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-cooperation 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

Agenda Item 8



Cabinet
18 March 2024

Strategic Asset Management Framework and Commercial Property Asset Management Strategy

Report Author(s): Debbie Lorimer
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Portfolio: Finance and Resources

Ward(s) 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 and Commercial Property Asset Management Plan updates the previous Asset Management and Commercial Asset Management Plans adopted in 2017. The Strategic Asset Management Plan 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.
2. The adoption of the Commercial Property Asset Management Strategy.

1 Summary

- 1.1 The Council holds a significant number of property assets worth circa £48 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, which will replace the Asset Management and Commercial Asset Management Plans previously adopted in 2017.
- 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.
- 1.5 The accompanying Commercial Property Asset Management Strategy focuses specifically on a subset of the Council's property portfolio and the management of those going forward. Members should note that this does not include the management of the residential property owned by the Council's wholly owned company Big Sky Property Management Ltd as that is the responsibility of the company, it should be borne in mind when looking at the overall balance of the commercial property portfolio.

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.
 - Community Assets - held by the council in perpetuity to support recreational, cultural & social well-being of the area.
 - Investment (Commercial) Assets - held primarily to contribute to economic growth but also for the purposes of generating rental income and / or for capital growth generating rental income and / or for capital growth.

- 2.2 Over the past few years South Norfolk has increased its asset base with the delivery of two further business centres: Trumpeter House and Roxburgh House, Ella May Barnes at Norwich Research Park, temporary accommodation units 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 Big Sky. 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 the 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.
- 3.4 A revised Commercial Property Asset Management Strategy is also proposed in Appendix B to provide the basis for managing the Council's commercial property asset portfolio.

4 Other Options

- 4.1 Cabinet could decide not to adopt the Strategic Asset Management Framework and/or the Commercial Property Asset Management Strategy 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** – Both the proposed Strategic Asset Management Framework and Commercial Property Asset Management Strategy include 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 documents consider the Council’s Environmental Strategy and Delivery Plan.

5.5 **Crime and Disorder** – None

6 Conclusion

6.1 The current Asset Management and Commercial Asset Management Plans were adopted in 2017, since then there have been some significant additions to the Council’s land and property portfolios and the context in which the Council operates has changed. It is therefore good practice to update and adopt the Strategic Asset Management Framework and Commercial Property Asset Management Strategy. These documents 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.

7.2 The adoption of the Commercial Property Asset Management Strategy.

Background papers

None

South Norfolk Council

Strategic Asset Management Framework

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1 Introduction

1.1 Introduction

South Norfolk 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 South Norfolk Council will manage its land and properties.



Our Vision is:

To undertake a more 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 Council's property assets to become more sustainable, 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.
 - To assemble land and properties consistent with the delivery of the Council's economic and social agenda which may include the Council using its powers to compulsory purchase (CPO).

Strategic Asset Management Framework

4. Optimise the financial return and commercial opportunities of the Council's land and property portfolio, particularly in relation to the Council's investment properties to provide an income to support the Council's revenue budgets. This is within the context that the primary reason for holding Commercial property is for economic growth and development.
 - Review the investment properties portfolio to ensure assets are still achieving the right level of return.
 - Strategically manage a balanced portfolio of investment properties.
 - 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.

5. Use the Council's property assets to stimulate development and tourism 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 and, where appropriate tourism recognising the unique characteristics and heritage of place.
 - Use investment in the Council's investment properties portfolio for income generation and to create local employment and training opportunities.
 - Use the Council's assets to address health inequalities as identified in the Council's health and Wellbeing Strategy.
 - Use the Council's capital investments in its property assets to stimulate economic growth.
 - 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 South Norfolk 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 framework which includes operational and community property assets, but under which sits a specific asset management strategy for Commercial 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	Functional Suitability	Running Cost	Condition	Carbon Efficiency

Strategic Asset Management Framework

indirectly) the delivery of council services				
Investment (Commercial) Assets – held primarily to contribute to economic growth but also for the purposes of generating rental income and / or for capital growth	Rate of return	Value	Occupancy Rates	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

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	2	3,876
	Service	Depots	1	467
		Car parks	18	2,336
		Temporary Accommodation	2	862
		Leisure Centres*	3	18,547
		Gipsy & Travellers Sites	1	55
		Public Conveniences**	2	113
		Sewerage Plant	1	3
		Surplus Assets	Land awaiting development	9
Investment Assets	Commercial	Industrial	21	4,141
		Offices***	7	7,090
		Retail	2	532
		Garages	7	240
		Caravan Site	1	291
		Land awaiting development	4	1,310
		Land for rent	7	3,534
Community Assets		Commons & Parish Land	Inc.	N/A
		Countryside Sites	Inc.	N/A
		Amenity Land	135	N/A
		Cemeteries	1	N/A
	Assets held for Sale		1	3,296
			Total	£48,262

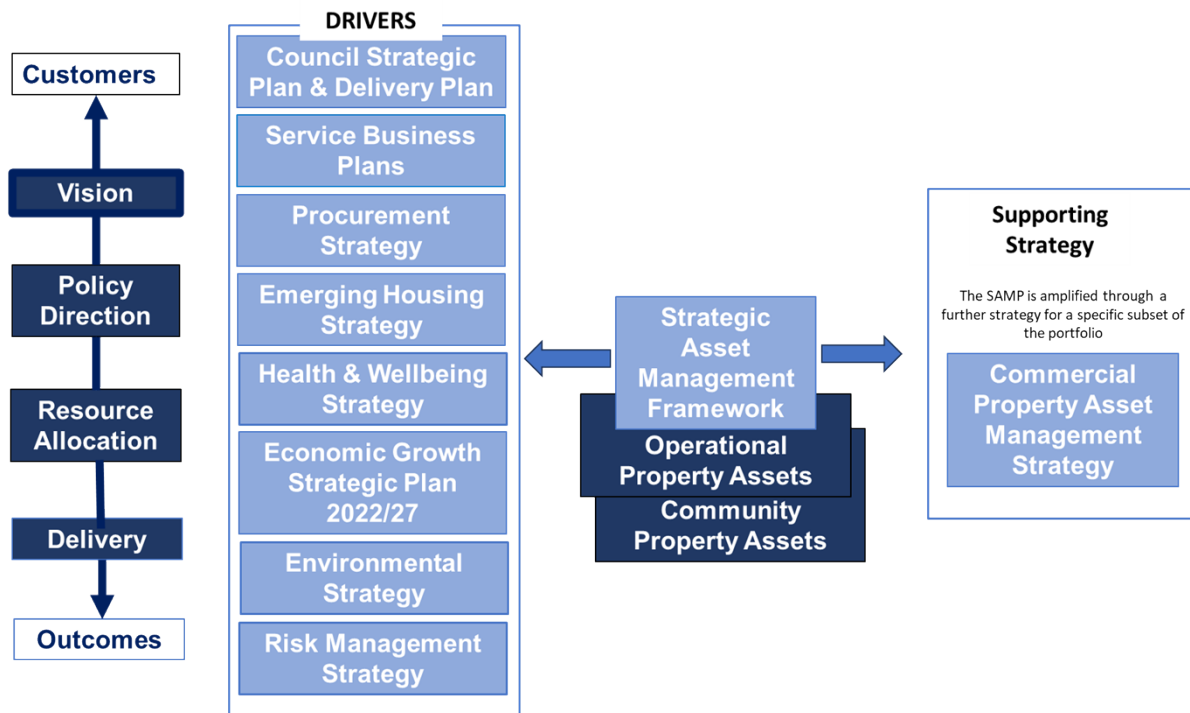
¹ Asset value is for capital accounting purposes and is not necessarily related to market value as at 31/03/2023
 *Includes Ketts Park Tennis Pavilion
 **Includes Diss, which is leased to the Town Council
 ***Providing 59 leases (inc 2 retail units at Loddon)

The figures above do not include the property assets that are held by the Big Sky Group, a set of companies wholly owned by South Norfolk Council. Within the Big Sky Group, Big Sky Property Management Ltd has a housing portfolio which at the 31st March 2023 was valued at £7.4 million. These property assets are owned and managed by the company and as such are not covered by this Strategic Asset Management Framework.

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 operational property assets with other parts of the portfolio having complimentary but discrete strategies.

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.

Rising costs and housing affordability

Affordability of housing and costs of general living remains a persistent challenge. We are witnessing an increasing number of families struggling to secure stable and affordable housing and a growing burden of utility costs and

rising prices for essential goods and services including food and energy. This is causing a significant increase in demand for temporary accommodation.

Ageing populations and health

We have a growing and ageing population. General health in South Norfolk is better than the Norfolk average, however, there remains challenges we need to face around health inequalities, mental health and access to services.

The Natural Environment

Climate change, including increased flooding incidents, and the effects on people and communities at both a local and national level is one of the biggest challenges of our times. South Norfolk has some of the best opportunities in the UK to transform our economy, allowing us to live better lives whilst minimising our environmental impact. This is more than just a commitment to net zero, important though it is, this is about using our location, unique natural spaces, local engineering and innovative skills to redefine the post-carbon economy.

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 South Norfolk Council's Our Strategic Plan for 2024-2028. The overall vision is ***'Build a future where our community thrives, individuals are inspired, and the quality of life is continuously enhanced.'*** To achieve this the Council intends to focus resources and efforts in four areas. These are: -

- **Enhancing our environment**
 - Provide environmental leadership to build a cleaner and more sustainable future.
 - We commit to conserving and enhancing biodiversity through best practice management and implementation of our Environmental Strategy and Delivery Plan.
 - Protecting and improving our natural and built environment, whilst also maximising quality of life for our local communities.
 - Our vision includes clean and green spaces, smart planning, and renewable energy initiatives that reduce our carbon footprint and improve air and water quality.

- **Growing a prosperous economy**
 - Give businesses across South Norfolk the confidence to invest and grow, creating opportunities for our residents and improving their quality of life in an already outstanding environment.
 - We envision a dynamic local economy that attracts investment, fosters innovation, and creates jobs.
 - We support and nurture businesses, from small startups to established enterprises, ensuring long-term prosperity for our community.

- **Enriching our communities**
 - Build strong communities who have the resources and open spaces they need to thrive.
 - Ensuring that community spaces and facilities are inclusive and can be accessed and used by everyone.
 - We are committed to promoting physical and mental health, providing access to healthcare services, and creating a community that values and supports the well-being of all residents.

- **Moving with the times**
 - Deliver services that residents, businesses and communities say are innovative, efficient, and easy to use.
 - We aspire to be an open and transparent Council that listens to its people.
 - We will adapt to changing needs and promote a culture of accountability, always seeking ways to improve our services and communication.

These priorities and activities 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:- seek external resources to deliver required infrastructure; improve the range of housing to meet local needs and deliver more affordable and temporary housing; protect green and open spaces; support new local businesses through a supply of business premises; encourage market town vibrancy through promotion of local service hubs 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 £0.8 million over the five years to 2028/29, the medium-term plan already includes a £1.7million reduction over this period in the cost of services, as a result of its transformation plans but will continue to look for further opportunities.

In the previous five years the Council's revenue budget has been supported through income derived from its investment properties and its investment in its wholly owned development and property management companies. There is an intention for this to continue. The Council has borrowed £20 million in 2023 to support the delivery of its ambitious capital programme for the next five years. The capital programme includes further investment in commercial property to earn a return. Such investments are subject to a robust business case on an asset-by-asset basis. 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.

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 ***a more 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.

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- Prioritise those open spaces assets 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	Enhancing our Environment	Growing a prosperous economy	Enriching our communities	Moving with the times	Indicative Timing (completed by)
<ul style="list-style-type: none"> Undertake condition surveys on all buildings within the next four years, looking ahead 25 years to inform individual reviews and capital programme 	■	■	■	■	27/28
<ul style="list-style-type: none"> Review the Commercial Property Assets to maximise return of the Portfolio 				■	26/27
<ul style="list-style-type: none"> Undertake options assessment for expansion or re-provision of Ketteringham Depot 	■	■	■	■	Q4 25/26
<ul style="list-style-type: none"> Local Authority Housing Fund. Purchase of Temporary Accommodation and Resettlement Homes Phase 1. 		■	■	■	Q1 24/25
<ul style="list-style-type: none"> Temporary Accommodation. Transfer the property management to Big Sky, including provision of proactive management plan 		■	■	■	Q3 24/25
<ul style="list-style-type: none"> Wymondham Station Approach, progress the planning permission and compulsory purchase order 	■		■	■	Q4 25/26
<ul style="list-style-type: none"> Gypsy and Travelers Site. Progress the options review and lease negotiations with current holder 		■	■	■	Q1 24/25
<ul style="list-style-type: none"> Completion of the refurbishment of Diss Swim Centre 		■	■	■	Q3 24/25
<ul style="list-style-type: none"> Provision of a new dry side leisure facility in Diss 		■	■	■	2026
<ul style="list-style-type: none"> Provision of Diss Surgery 		■	■	■	26/27
<ul style="list-style-type: none"> Provision of Hethersett Surgery 		■	■	■	26/27
<ul style="list-style-type: none"> Queens Hills Country Park 	■	■	■		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 Broadland District 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, South Norfolk House, in Long Stratton, is in the process of being sold. To service the most southerly area of the district, services are also offered from the Council owned Octagon Hub in Diss to the town and the surrounding villages.
- **Leisure Centres** – The council owns three leisure-based facilities: with centres at Wymondham (Both dry and wet side facilities), Long Stratton (Dry side facilities), Diss (Wet side facilities). It also leases two other sites that provide dry side leisure facilities at Ketts Park in Wymondham and Framingham Earl. There are further aspirations to deliver within the period a dry leisure facility in Diss to complement and enhance the existing swim provision.
- **Ketteringham Depot** – The Council owns the freehold of Ketteringham Depot from which it provides its waste services. This is an old and 'traditional' depot, which whilst currently supporting waste services effectively is working at capacity and is not 'fit for the future'. There continues to be growth in the demand for waste services and the regulations for its treatment, including recent legislation which will lead to the introduction of food waste collection. Therefore, options of how to accommodate the need for increased capacity for the service are being considered and will need to be delivered with the life of this strategy.
- **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 Big Sky Group of companies manage the portfolio of accommodations, 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 approved maintenance regime.

- Local Authority Housing Fund – The Council has successfully secured funds to purchase at least 11 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 the Big Sky Group and is developing a model for Big Sky to manage this portfolio in line with the Temporary Accommodation.
- Wymondham Sales Yard – The Council has an aspiration to acquire and improve the public realm and access to the area around the Wymondham train station, a feasibility study has been completed.
- Gypsy & Traveller Sites – The Council owns the freehold of a Gypsy & Travellers site which was granted on a long lease to Norfolk County Council who manage and operate the site with no SNDC involvement. This lease is due to expire shortly, and the Council are in discussions on the ongoing provision and management. The Council also owns a transit site for short-term placement of travellers.
- 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 (common land, woodlands, and Queen's Hills Country Park for example). These spaces offer vital outdoor access and recreational space for local communities, but are 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 Vehicle Charging Point provision, a small number of streetlights, bridges and culverts. These provide a service to local communities, and in the case of car parks generate an income to the Council whilst supporting a vibrant market town economy.

4.3 The Commercial Portfolio

As identified in 3.2 the assets held as part of the commercial portfolio are to contribute to economic growth but also for the purposes of supporting the revenue and capital budgets through generating a medium-term revenue stream or long-term capital appreciation. It comprises industrial, office, research and retail investment class assets. Increasingly emphasis is being placed on

proactive management of the commercial portfolio as part of the Council's wider financial management strategy and there is an aspiration to review the commercial portfolio over the medium term. This therefore has a separate strategy document which amplifies the operating context, strategic direction and actions for this portfolio. This is an accompanying document to this SAMP.

4.4 The Community Assets 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 (pathways, car park areas, playgrounds and play equipment 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.

4.5 Key Achievements in 2018-24

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: -

- In September 2022 the Council jointly purchased with Broadland 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

Strategic Asset Management Framework

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).

- Long Stratton leisure centre has undergone a major re-development to include pool refurbishment work, new change facilities, new spa, café, reception, gym studio, main hall refurbishment and associated upgrades. Centre re-opened in March 2019.
- Diss Swim and Fitness Centre is undergoing a renovation and improvement programme in 2024. This includes investment in the fabric of the building with installation of insulation, solar and air-source heat pumps funded through the PSDS. A reduction in the depth of the pool and retiling and a complete refurbishment of the waiting, refreshment and changing areas. This will remove the current small gym provision from the site, with plans to facilitate that in a separate dry side facility next door to the mere.
- Ketts Park has seen the development of a 3G pitch and a tennis pavilion in recent years.
- Three Business Centres have been constructed in Poringland and Long Stratton, providing 20,000 sq. ft of flexible office accommodation for economic development purposes.
- A modern building called Ella May Barnes was construction in 2020/21 on the Norwich Research Park, providing 16,000 sq. ft of laboratories and administration space to assist in developing the Enterprise Zone.
- The Council owned car parks have seen an expansion of the provision of electric vehicle charging points, to enable its residents and visitors to the district make the transition to electric vehicles from diesel and petrol vehicles.
- Improvements to the temporary travellers' site at Bawburgh.
- The disposal of public toilets in Long Stratton to the local Town Council along with the transfer of the maintenance and management of the public toilets in Diss to the Town Council. In Harleston the public toilet provision was updated and transferred to the Town Council.
- An upgrade programme to more efficient and environmental street lighting provision in 2018/19, after which the management was then transferred to the local towns and parish councils.
- The Council created two limited companies from 2013, with the governance being reviewed and amended in 2021. Their purpose is to undertake property development, investment and management activities.

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- Big Sy Developments Ltd was established in 2013 and seeks to develop land for mixed use schemes to generate income and to support the local economy, infrastructure and jobs. To date the company has delivered 323 homes in Poringland, Long Stratton and Cringleford. The company currently has land to deliver a further 148 homes and is in discussions to acquire land to secure a delivery of up to 100 homes for the next 5 years.
- Big Sky Property Management Ltd was established 2014 to invest and manage property to generate revenue income to support council services. The company currently manages 27 homes for private rent and is working with the Council to secure further 6 properties to provide resettlement homes. The company also manages the Council Commercial portfolio of offices/business centres, retail and industrial units. This company is also seeking to provide a wider property management and advice service to the Council, supporting the management of the temporary accommodation dwellings and other similar property related matters.
- Big Sky Developments Ltd has also acted on behalf of the Council in providing commercial properties to increase its commercial investment portfolio to generate revenue income and support economic growth. To date the company has delivered 4 properties in Poringland, Long Stratton and on the Norwich Research Park. The commercial property portfolio has seen an increase in the return it is generating which is now at 6.63%.

4.6 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** – The Council's management company, Big Sky Property Management is consistent with managing the Council's investment property assets at its current size. However, the Council has aspirations to further review existing properties to ensure the maximum return and benefit towards achieving the council's priorities.

4.7 Ownership/monitoring of Actions

It is essential that both the overarching Action Plan and the individual Action Plans for each specific class of property 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 to the Finance and Resources portfolio with responsibility to the Director Resources. It also details at Part 4 – Rules for Financial Governance Section 13, the recording of land and property owned by the Council and the delegations and processes relating to property acquisitions, and disposals as well as leases.

The Action Plans will be delivered through a combination of in-house teams such as the facilities team, through the Council's Big Sky Group of Companies as well as third party suppliers and contractors.

South Norfolk Council

Commercial Property Asset Management Strategy

Commercial Property Asset Management Strategy

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Commercial Property Asset Management Strategy

1 Introduction

1.1 Purpose and Scope of Strategy

The Local Government Act 1972 gives the Council powers to acquire any property or rights which facilitate, or is conducive or incidental to, the discharge of any of its functions. The Council owns a variety of commercial properties. These assets have been acquired over a number of years primarily to facilitate economic development and growth in the area with the secondary purpose of generating rental income as support to the Council's revenue budget. With continuing public expenditure restraint, it is important that the management of the commercial property portfolio is directed to generate long term rental income streams and capital growth to support future delivery of Council services by reducing dependence on government grant. This document presents the Council's Commercial property strategy for the medium term. It sets out: -

- The Council's rationale and objectives for holding commercial property.
- The criteria for identifying acquisitions and reviewing asset performance.
- The risks to the Council of such activity and how they might be managed.
- The governance arrangements covering management of the portfolio.
- Day to day principles covering the operation of the portfolio.

This strategy is the Council's second formal commercial property asset management strategy and as such much of the emphasis has been placed on articulating the Councils' objectives for the portfolio and its operating principles.

1.2 Overview of the Portfolio

The Council has a wide variety of commercial properties. These include 55 individual letting units, at 4 main business centres. The total commercial Portfolio has a value of circa £17,138 m and generates circa £869 k p.a. of gross income.

Property	No. of Units	Annual Rent (£) as at 7/3/2024	Value as at 31/3/2023 (£)
Crafton House	16	137,649	1,565,400
Roxburgh House	14	102,000	1,155,700
Trumpeter House & Cobb Lodge	13	72,300	988,800
Loddon Business Centre	12	37,940	494,400
Ella May Barnes	2	200,000	2,589,200
Retail units Diss	2	50,000	532,300
Others	1	0	296,200
Industrial	21	263,417	4,141,400
Garages	7	£3,340	240,300
Land for Rent - plots	10	£1,526	3,533,700

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Caravan Site	1	£480	291,300
Land for development - sites	4	£50	1,309,800
Total		£868,702	17,138,500

Excludes Diss Business Centre, which comprises 34 units.

The figures above do not include the property assets that are held by the Big Sky Group, a set of companies wholly owned by South Norfolk Council. Within the Big Sky Group, Big Sky Property Management Ltd has a housing portfolio which at the 31st March 2023 was valued at £7.4 million. Although Big Sky Management Ltd is a commercial company and its property assets are commercial property, they are owned and managed by the company and as such are not covered by this Commercial Property Strategy. However, when considering the balance of the commercial property portfolio the value of the housing assets held in Big Sky Property Management should be taken into consideration.

1.3 Format and Content of Strategy

This section has set out the purpose and scope of the Commercial Property Asset Management Strategy. The remaining document is in four parts (Sections 2 – 5) with appendices containing supporting material.

- **Section 1 – Property as an Investment Class** – this provides an overarching context about the approaches to using property for commercial purposes. It is intended as a brief context within which to understand and position the Council’s current approach to its commercial property holdings.
- **Section 2 – Strategic Context** identifies the broad operating context in which the Council is operating and some of the key influences that may shape the Council’s approach to managing its commercial property portfolio.
- **Section 3 – Understanding the Commercial Portfolio.** This provides summary data in order to fully describe the commercial portfolio. It is amplified by a schedule of assets within the portfolio given in Appendix A.
- **Section 4 – Managing the Portfolio** sets out the key aims and objectives with respect to the commercial portfolio, its governance arrangements and day to day operating principles. It also defines a set of basic performance measures for the portfolio.
- **Section 5 – Implementing the Strategy** identifies some key actions looking forward; discusses the Council’s capacity and expertise in managing the

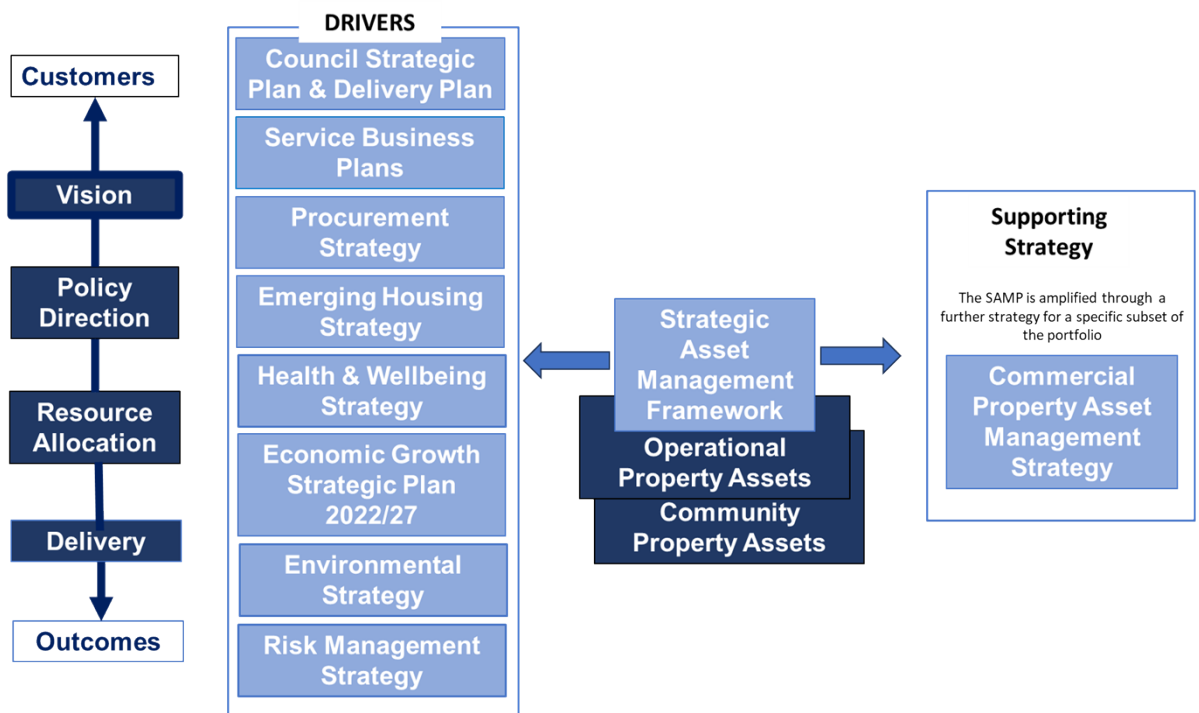
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portfolio over the longer term and identifies some of the risks associated with managing the portfolio.

1.4 Links to Other Plans and Strategies

This Commercial Property Strategy does not sit in isolation. It is related to the Council's wider corporate and service strategies and in particular the Council's medium term financial plan. The strategy is part of a wider set of documents relating to the overall management of the Council's property portfolio. The broad framework for this is articulated through the Strategic Asset Management Framework; whereas this strategy provides amplification of the framework through a specific dedicated strategy for the commercial assets the Council holds for commercial and investment reasons. This linkage is shown in the following diagram.

Diagram1 – Links with other Plans



2 Property as an Investment Class

2.1 Legal Framework

The Council has the legal power to acquire and hold both commercial and residential property for investment purposes. Commercial property can be acquired and operated directly by the Council providing that the clear purpose is investment rather than holding it to perform either a commercial or trading activity from it. If a trading activity from the property was the primary function then the commercial property acquired would need to be held in a company vehicle. Residential property can be acquired if the assets are being held and operated indirectly through a local authority controlled Special Purpose Vehicle.

Local authorities have broadly drawn powers allowing them to invest and to borrow, in each case either for purposes relevant to the performance of any of their functions or generally for the prudent management of their financial affairs (s1 & s12 of the Local Government Act 2003). They may also acquire property either inside or outside of their administrative area for the purposes of any of their functions, including their investment functions, or otherwise for the benefit, improvement or development of their area (s120 of the Local Government Act 1972). Lastly, they may also take any action (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive or incidental to, the discharge of any of their functions, which would again include their investment functions (s111 of the Local Government Act 1972).

The Council can also build and manage an investment portfolio under the general power of competence (set out in s1 of the Localism Act 2011). In accordance with this Act, the Council has all the necessary powers to purchase assets inside or outside the District (or the UK) and manage them for investment and commercial gain.

For South Norfolk Council the acquiring of Commercial Property Assets has been first and foremost for economic development and to encourage economic growth within the district. The development of business centres within the residential developments built by the Council's wholly owned development company Big Sky Developments Ltd were to enable people to live and work within the same locality. The building of Ella May Barnes on spec was to encourage growth and further development at Norwich Research Park and to offer grow on space for developing companies. The generating of rental income is therefore a secondary purpose, although an important one, in supporting the Council's revenue budget.

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It should be noted that on 20 December 2021 CIPFA published revised Treasury Management and Prudential Codes, with formal adoption not required until the 2023/24 financial year. These together with The Treasury terms of borrowing from the Public Works Loan Board (PWLB) prohibits Councils from borrowing to buy capital assets purely and primarily for a commercial return. The Council's Treasury Management Strategy provides further detail in respect to this.

2.2 Risks and Returns

At its simplest, property is an investment in land and/or a building giving the investor a return as rental income and/or capital value growth. Capital growth may come over time by holding the asset or be driven by asset management initiatives. Risks and returns in property investment come both at a market level and from individual asset choice. The choice of location and the choice of property sector influences the risks and returns associated with any investment. High growth economies offer the potential of property values increasing in line with higher rates of growth in GDP, but they may also represent higher risk with anticipated future growth already factored into prices being paid. At an individual asset level, there are asset specific risks and opportunities. Asset specific events, such as the loss of an important tenant, illustrate such risks. The two components of property investment returns (rental income and capital growth) are very different.

- **Rental Income** - The bond-like rental income return tends to be stable and reliable showing little volatility. Over 25 years the rental component of the MSCI UK Monthly Property Index has never exceeded 10% per year or dropped below 5% per year. The Investment Property Forum (IPF) are currently predicting a 5 year average 5.6% per year total return. Rental income also has a linkage with inflation. In some leases, this may be expressed contractually with rents increasing with inflation (albeit with caps or collars to the increases). With others, triennial or quinquennial rent reviews will tend to follow inflation. In difficult economic times, rents tend to fall on re-letting. It is also expensive to hold empty property as, for example, there can be security costs or business rates may be payable if there are not any reliefs to mitigate these costs. Rental income can be more volatile in secondary locations with little tenant demand as landlords may tend to let them at whatever price they can to avoid the overhead of empty properties.
- **Capital Growth** - The equity-like capital growth component of property returns can be volatile. Property prices do not show rapid price fluctuations of quoted equities, but on a longer time scale, price movements can be just as severe. The IPF forecast the five-year

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annualised capital value growth at 0.7%, which takes into account the reduction in 2023 of 5% and forecasting 0.1% growth in 2024, returning to more expected growth figures of around 3% in 2025. Asset management and development activity can drive property returns in a manner less correlated with general property market/index returns, but such activity also involves an acceptance of greater potential risks.

In practice, property investments can be structured to create a range of different risk/reward profiles from stable bond-like annuity income performance to volatile equity-like development returns.

2.3 Approaches to Investing in Property

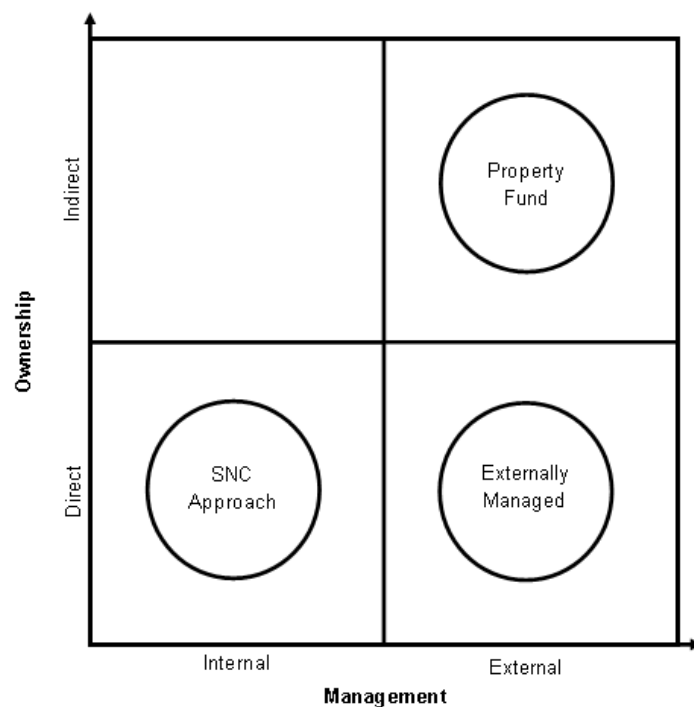
There are a range of approaches to investing in property assets – each with their own advantages and disadvantages. The simple framework below is intended to provide a framework for thinking about these based on two broad perspectives (ownership and management). The positioning of the Council is shown - which is based on both direct ownership and direct management, utilising the expertise in the Council’s wholly owned Big Sky to manage investments properties. This is an explicit choice of the Council, and the respective pros and cons of this choice are identified.

Pros:

- Ownership of property assets
- Achieve direct returns
- Control over property decisions
- No fund management costs

Cons:

- Large Investment per property
- Reliance on own expertise
- Management time & expense
- Relative lack of liquidity

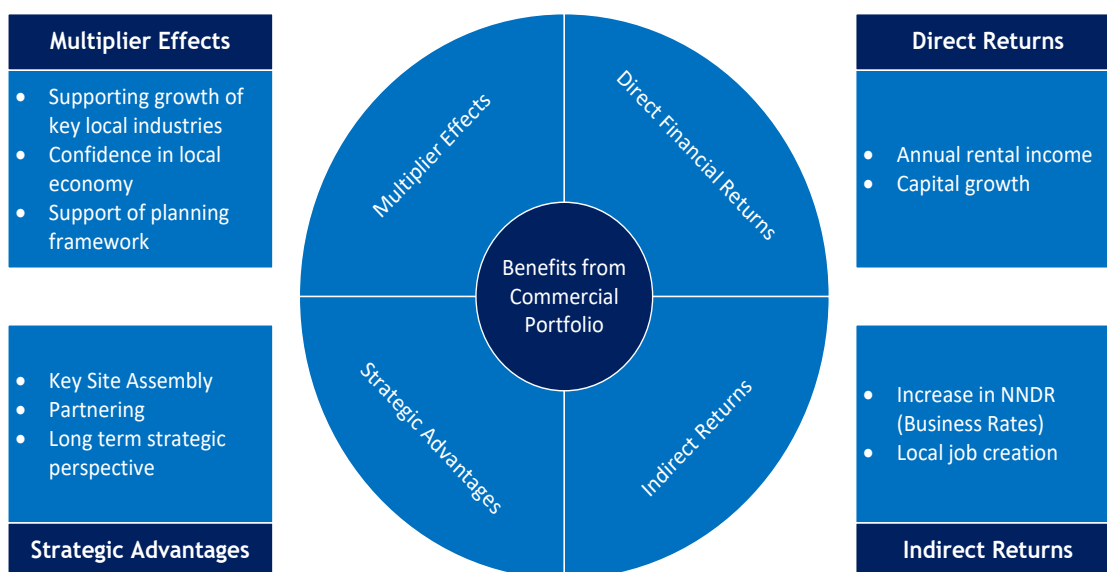


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The advantage of this approach is that the Council retains direct ownership of the assets with any returns coming direct to the Council. The Council in conjunction with Big Sky, also retains control over decision making on individual properties and the portfolio as a whole; including the flexibility over if, and when, to liquidate assets to generate capital. With this approach there are no fund costs associated with other parties holding and managing properties on the Council's behalf. Conversely it may require large incremental costs to participate in property investments (to acquire property) and requires a degree of capacity and expertise within the Council (or to have access to it) to manage the portfolio. There can be a large amount of staff time (and thus cost) tied-up in managing the portfolio and there is a relative lack of liquidity in comparison with other forms of property investment.

2.4 Benefits from Investing in Commercial Property

The range of benefits that can arise from the commercial portfolio are more than simple direct financial returns, for South Norfolk Council the economic benefits of providing commercial property is primary. The diagram below summarises the range of benefits that can be realised and the combination of these need to be born in mind when managing the portfolio. The relative priority given to these benefits needs to be considered as part of acquisition and review decisions on the portfolio. There is opportunity to strengthen the links between the council's commercial property portfolio and its economic development role.



3 Strategic Context

3.1 Changes to Operating Landscape for Local Government

Local government is re-inventing itself with the whole process of democracy, accountability and service delivery changing. There are a range of influences which may have an impact on how the Council manages its commercial portfolio.

- **Financial Independence** – Local Government continues to face financial pressure, as real terms funding decreases, especially with the impact of high inflation rates in recent years. There is still uncertainty over the long-term funding of Councils, especially around the retention of business rates scheme and New Homes Bonus. The sector continues to call for multiyear settlements to provide some level of certainty. Alongside a real terms reduction in funding, there has been an increase in demand for services especially following Covid and the impact of high inflation on households. It is imperative therefore that Councils find alternative income to mitigate the funding gaps in Councils medium term financial plans. This will require councils to continue be more innovative and commercial in how they generate funds to support local services and provides a strong impetus for the council to grow the income it secures from the commercial portfolio – both through improved management and acquisitions to enhance the portfolio.
- **Formal Approach** - The principle of using property returns to fund front line services is not new with many local authorities actively involved to a greater or lesser degree for many years. However, historically investment in commercial property investment by local government has not necessarily been on a structured or formal basis. However, with the changing operating climate and an imperative to increase income generation there will increasingly be a need to adopt a more formal approach to ensure compliance with financial statutes and a proper focus on the performance of the commercial portfolio.
- **Capacity & Expertise** – Constraints in public expenditure are inevitably meaning there are likely to be increasing pressures on the number of staff over the short to medium term. Managing the commercial portfolio requires some capacity and a specific sort of expertise which may be in short supply.
- **Partnership Working** – Increasingly councils will need to work with other public bodies to provide coherent services to the public whilst minimising ‘back office’ costs. This may provide the Council with an opportunity to offer its services to others from its cumulative expertise to date in

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managing the commercial portfolio. There may also be a drive to unify such expertise into a 'shared service' type model – particularly if similarly sized councils in the region are embarking on a similar approach to income generation through their commercial portfolios.

3.2 Market Outlook

National Outlook – commercial property returns tend to be linked to national economic performance and to the relative prosperity of the economy. UK commercial property investment volumes were subdued throughout 2023. However there are indications that 2024 will see confidence returning among investors. The following report from property experts CBRE are typical of the outlook across the property sector.

“Investment returns for real estate should improve in 2024, following 18 months of challenging market conditions. While the prospects for yield-driven capital growth appear limited, income returns will underpin an improvement in total returns, and a falling inflation rate increases the likelihood of positive real returns from property investments.

The divergence in performance across property types is likely to persist in 2024. The industrial and residential sectors are likely to benefit from better near-term prospects for rental growth and a greater investor appetite, while the office and retail sectors will continue to see polarisation based on the quality of assets.

Obsolescence of older office and retail assets will be a key challenge for the UK real estate market next year. The fall in values and rise in financing costs since mid-2022 will reduce opportunities to profitably refurbish or repurpose older stock until market conditions improve. This could impact progress towards more sustainable, lower carbon investment portfolios.

Real estate investment activity should increase in 2024 relative to 2023. However, investment volumes in cash terms will take more time to recover as investors trade at lower price levels in the wake of the downturn. Market conditions will provide investors with equity and the chance to execute counter-cyclical investment strategies.

Real estate debt markets will generate further headlines next year as more loans from the pre-pandemic period approach maturity. Higher interest rates will constrain how much lenders are prepared to lend at refinancing, and so some

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distress will emerge where existing loans cannot be replaced and more equity from the borrower is not available.”¹

The commercial portfolio does, however, need to be seen over this longer term as reacting to short term market changes can be expensive. In this context it will be important to balance a one-year budget cycle and the income required for this with the longer-term perspective that is required for managing the commercial portfolio.

The changing nature of the economy – globalisation; use of technology for mobile working and the trend to work from home following the lifting of the Covid restrictions have seen a reduction in the demand for larger accommodation but an increase in the demand for smaller accommodation. This is yet to fully work through existing agreements and is likely to change again as business continues to achieve a post-Covid normal. This is a good example of how unforeseen events can impact on the demand for different types of buildings. As business became more ‘fleet of foot’ it demonstrated a need for different types of occupying terms for companies to give them such flexibility whilst ensuring a suitable return.

Local Outlook

South Norfolk land use is mainly devoted to agricultural uses. There are more than 5,645² active businesses in the district with over 90% employing five or fewer people. Within the public sector there are some major employers including the Norfolk and Norwich University Hospital and Norfolk Constabulary Headquarters. The Council has worked closely in the past with the New Anglia Local Enterprise Partnership (NALEP) to secure inward investment to the local area and to promote the Cambridge Norwich Tech Corridor for businesses to bring inward investment to the area. The Council is focusing on continued development of high performing clusters; Agri-food and Life Sciences, Manufacturing and Engineering, Visitor Economy and Cultural Sectors. In addition there are growth clusters in Finance, Insurance and Professional Services, and Clean Energy and Technology which are being supported. The Council has identified a lack of warehouse space in the area and also move on space for startups and expanding businesses.

¹ [UK Real Estate Market Outlook 2024 | CBRE UK](#) Chapter 2 Investment 7 December 2023

² South Norfolk Council Economic Growth Strategic Plan 2022-2027 Summary
<https://www.southnorfolkandbroadland.gov.uk/downloads/file/5288/south-norfolk-council-economic-growth-strategic-plan-summary>

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3.3 Resource Context

Over the past years the Council has increased the return from its commercial property to reduce the impact of government funding reductions. Going forward, South Norfolk Council, like most Councils, continues to face a funding gap over the medium term. The Council seeks to close this funding gap through a combination of additional income and costs savings as a result of productivity increases and use of technology. It is important that the current commercial portfolio performs to its optimum in relation to the income generated from rents. The five-year capital programme contains investment in two GP Surgeries that will not only provide a return to the Council but also provide much needed healthcare infrastructure. Any other investment in commercial property would need to be balanced against the Council's wider capital programme. It is therefore likely that any further investment in commercial properties would be as a result of reinvesting the proceeds from selling existing commercial property.

3.4 Looking Further Ahead

Given the operating and resource context identified above, it is important to have a medium perspective (5 years) for the commercial portfolio. Looking to the longer term, over and above this, raises some specific issues that may need to be considered as the commercial portfolio matures. These are identified briefly below:

- ***The ambitions of the Council*** – The Council needs to ensure its commercial property portfolio continues to deliver a healthy return that supports the Council's revenue budgets. Apart from two new GP surgeries that are to be delivered over the next five years, any further investment will be as a result of selling existing property to reinvest the proceeds to improve the return. There is a need for Big Sky to maintain the capacity and expertise to manage the portfolio.
- ***Geographical scope*** – whilst the current operating parameters for the commercial portfolio are restricted to the South Norfolk area and its immediate surroundings this may prove a limiting factor because of the available stock locally and likely returns from locally based assets in comparison with other areas when set against high expectations of the Council in terms of long-term -growth of the portfolio. There is likely to be a choice around 'investing in the area' or 'investing in property'. It is anticipated that the Council will maintain its position of investing within its own district rather than widening its scope of operation to, for example, the wider Norfolk and Suffolk area. Investing in commercial property beyond its own boundaries would only be considered if the opportunity

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was exceptional and contributed towards other Council priorities beyond making a good financial return.

- **Portfolio balance** – The current mix of property assets is a legacy of acquisition decisions over the past five years and taking opportunities which have arisen. With limited future growth in the size of the portfolio, the Council will need to undertake a re-appraisal of the portfolio mix to ensure the portfolio is balanced and mitigates the risk of having invested in singular asset types.
- **Management arrangements** – The Council has now been using Big Sky to manage its commercial portfolio for the last 6 years. The skills to manage a commercial portfolio are not abundant within the Council itself. There is a requirement to ensure adequate capacity, expertise, and resilience in managing the portfolio continues and from time to time this needs to be reviewed.

At the current time the commercial portfolio makes a significant contribution to the Council's revenue budget, however, with the exception of potentially two GP surgeries, there is limited investment in new properties contained within the Council's five-year capital programme that would also be classed as commercial properties. It is important that the portfolio is kept under review to take up any opportunities that arise to dispose of any properties and to reinvest the proceeds to improve the return on the investment.

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4 Understanding the Commercial Portfolio

4.1 Financial Outturn

The financial income and expenditure profile covering the last three financial years below to 2022/23 is set out below.

3 Year Income and Expenditure Profile			
	2020/21	2021/22	2022/23
Gross Income	£490,567	£503,590	£558,807
Expenditure	-£118,435	-£76,496	-£90,323
Net Income	£372,132	£427,094	£468,484

4.2 Portfolio Balance

The units are a mix of asset types. These are briefly summarised in the table below. As can be seen there is a predominance of office units.

Sector	Number of Units	Rental Income p.a. (£) ¹	Portfolio Weighting by Income (%)	Capital Value (£) ¹	Portfolio Weighting by Value (%)	Yield
Industrial	21	270,000	48%	4,141,400	36%	6.5%
Office ²	55	238,807	43%	4,204,300	37%	5.7%
Research ³	2	0	0%	2,589,200	23%	
Retail	2	50,000	9%	532,300	5%	9.4%
Total		558,807		11,467,200		6.3%

Note 1 – Values as at 31/03/2023, please note these differ to the rents shown in 1.2 above due to the different dates.

Note 2 – EMB no income at 31/03/23

4.3 Rent and Lease Profile

The portfolio is also made up of a mix of leases in terms of the quantity of rent and the length of lease with a predominance of smaller rents per annum (because of the small unit sizes). As can be seen from the table below, there is a spread across the years, which assists with smoothing income volatility, increased void and re-letting costs. It is also likely that some of these leases will continue beyond their assumed expiry date, helping also to mitigate these risks. Longer lease terms contribute to higher capital values, however, so if portfolio churn is a desired way to realise financial returns, then the Council should consider securing longer lease terms compared to the profile presented below.

Rent per annum from leases with unexpired terms falling within the following bands (as at 05/03/2024)						
Less than 1 year	1 – 5 years	5 - 10 years	10 – 25 years	25 – 99 years	99 – 125 years	Over 125 years
£242,460	£249,129	£101,940	£200,000	£49,173	£26,000	£0

5 Managing the Portfolio

5.1 Aims and Objectives

Building upon the previous commercial property strategy it is relevant to reaffirm the Council's aims and objectives in having a commercial property portfolio. These are described in the table below.

Aim

To acquire and manage commercial investment properties (the commercial portfolio) primarily to support the Council's delivery of its priority in ensuring the economic prosperity and well-being of South Norfolk. Secondary to this is to provide an income to support the Council's revenue budget

Objectives

- Primarily to provide commercial property that contributes towards the economic growth and development of South Norfolk Council.
Secondarily:
- To acquire and hold properties that can provide long term income or capital growth.
- To maximise returns whilst minimising risk through effective governance arrangements.
- To prioritise investment towards properties that can provide strong stable long-term income.
- To maintain and enhance the condition of properties to ensure long term income strength or income growth.

It should be recognised that the overall aim has a twin purpose – firstly to promote economic prosperity and local well-being and secondarily to create a financial return - and that from time to time these may be in conflict. The pursuit of the primary aim of socio-economic benefits (through, for example, supporting job creation) may in some cases dilute the pure financial part, however in these situations the primary aim has to take precedence and the long-term view has to be given consideration.

Acquisitions and disposals relating to the commercial portfolio, whilst needing to be consistent with the Council's financial standing orders, may also from time to time need to be taken quickly. This is likely to be in the case of acquisition where to secure a good investment asset may require timely intervention both to acquire the asset and to negotiate the best price.

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The Development Director of Big Sky along with the Assistant Director of Economic Development, along with external consultant advice where appropriate, will undertake an options appraisal and business case assessment in order to make a recommendation to the Corporate Leadership Team (CLT) around an identified acquisition. Subject to this initial work and briefing, Big Sky will be given delegated authority to express an interest and negotiate subject to formal approval by the CLT and sign off by the Portfolio Holder and Cabinet. This will allow a timely response to identified opportunities for investment which may require action at short notice due to property market conditions. Given the timescales involved it is recognised that the Council may have to make use of its emergency decision making powers and process in some instances. In all cases an option appraisal and business case should be developed and considered prior to a legal commitment to acquire an asset.

5.2 Operating Principles and Criteria

To manage the portfolio effectively it is important to have a set of explicit operating principles; a clear rationale for holding each asset and an understanding of the expectations, (financial or otherwise) from managing it. To do this the Council has a set of basic operating principles as shown below and a simple framework for assessing the portfolio in terms of acquisition, performance and disposal.

Operating Principles
<ul style="list-style-type: none">• The Council will retain direct ownership of all its commercial property assets.• The Council will utilise Big Sky to undertake the management of the commercial portfolio (as a landlord)• The geographical operating scope of the portfolio will be restricted to the South Norfolk administrative area.• The Council will seek to retain a 'balanced' portfolio through its mix of asset types and lease lengths with emphasis on industrial, office and retail uses.• Preference will be for full repairing and insuring (FRI) terms or FRI by way of service charge, meaning that all costs relating to occupation and repairs are borne by the occupier(s) during the lease term.• All assets will be reviewed periodically during their holding period to determine whether they are still contributing to the economic prosperity and well-being of South Norfolk, their performance and to allow for buy/sell/hold decision making.

In practice this will mean making judgements around the acquisition and disposal of assets; the portfolio structure; the holding period for individual

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assets; and the performance of the portfolio. A framework for assessing individual assets and the total portfolio, is given in Appendix B.

- Acquisitions & Disposals – The management of the portfolio will from time to time require some acquisitions and disposal of individual assets. These must be undertaken in accordance with the Council’s financial procedures; but may need to be expedited quickly to take advantage of investment opportunities.
- Development – the Council will seek to invest in developing commercial investment property using its development company, Big Sky Developments Ltd or in partnership with other organisations, subject to a robust business case.
- Portfolio Structure – the Council will seek to create a balanced commercial property portfolio that provides long term rental returns and growth. A core portfolio of property assets will be sought with a view to diversification on individual assets by sector (industrial, offices and retail), location and risk.
- Portfolio mix – the Council will seek to maintain a balance between Office, Industrial and Retail assets with a guideline approach of maximum of 50% (by capital value) of any class except shops which is limited to 10% due to the current risk exposure around retail. The Council will seek to avoid investing in specialist asset types (such as hotel & leisure) or distressed property requiring extensive capital expenditure unless significant returns can be generated.
- Holding Period for Assets – The Council will determine a ‘holding period’ for each property at acquisition and periodic review. This is to counter any significant depreciation eroding the value and to ensure a formal periodic review of the rationale for holding and performance of individual assets.
- Measuring Performance – Individual assets and the portfolio as a whole, will need to be subject to periodic performance assessment.

5.3 Day to Day Portfolio Management

Effective day to day management of the portfolio is critical to its overall the performance. This management needs to happen at both a strategic and operational level. They key activities include:

At a strategic level

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- Refresh of strategy and measurement of performance.
- Effective financial management including rent collection.
- Effective void management related to performance targets.
- Effective planned preventative maintenance programmes.
- Identifying new investment opportunities.
- Competitive portfolio management costs.
- Ensure there is a regime of planned maintenance and statutory compliance.

At a property level

- Preparation of strategies for individual properties.
- Identifying opportunities for improvements to property to add value.
- Identifying 'marriage value' arising from acquisition of adjoining properties.
- Identifying properties for disposal where performance prospects are poor.
- Ensuring premises are secure and safe.

5.4 Performance Criteria

Alongside the performance criteria below, the contribution towards the prosperity and well-being of South Norfolk also needs to be reviewed at both an individual property level but also for the portfolio. This assessment will include a number of economic measures such as jobs, sector analysis and growth of businesses occupying the properties together with any social benefits.

The performance indicators for the portfolio should be based on industry benchmark standards. These should be measured at an individual property and whole portfolio level with indicative targets set for each.

Indicator	Target
Rate of Return	5%
Revenue Growth (over 5 years)	5%
Capital Growth (over 5 years)	10%
Rent Arrears as percentage of rental income	<10%
Management & Ownership Costs (as a % of gross income)	18%
Occupancy	85%

Note: These are an initial list of possible performance indicators, which will be defined more fully in use.

The Rate of Return is perhaps the single most important performance indicator, and this can be judged against MSCI indices (Morgan Stanley Capital Investment) which is generally considered to be the most authoritative benchmarking index. However, given that the Council's property investments

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are held to provide an investment return, it is important to also consider the opportunity cost of holding property assets instead of other types of investment (e.g. cash, bonds). There will need to be a balance between short and medium term perspectives of portfolio performance. Whilst there is a financial requirement for income in setting an annual Council budget, properties are longer term investments which can fluctuate in the short term due to specific circumstances but will tend to provide stable longer-term returns. A degree of judgement will need to be used in evaluating the response to portfolio performance.

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6 Implementing the Strategy

6.1 Action Plan

Looking forward there are two planned buildings that will become part of the Commercial Portfolio once constructed. These are detailed in the table below. The actions are referenced to the Council's Corporate Plan priorities and are contained within the Delivery Plan. The anticipated funding implications and timing of these buildings are identified based on the current information available.

Actions	Links to Corporate Plan Priorities & Delivery Plan				Timing & Funding	
	Enhancing our Environment	Growing a prosperous economy	Enriching our communities	Moving with the times	Indicative Timing (completed by)	Funding Allocation (if known)
<ul style="list-style-type: none"> Undertake a planned maintenance survey to identify the annual planned maintenance required to maintain the commercial assets which are not on a FRL. The surveys to cover a 25-year period 				✓	2026/27	
<ul style="list-style-type: none"> Undertake a strategic review once the cost of ongoing maintenance is known to establish what opportunities are available to improve both the socioeconomic benefits and the overall return from the portfolio. Taking into account the portfolio mix and balance 				✓		
<ul style="list-style-type: none"> Delivery of Diss Surgery 			✓		2026/27	£4,000,000
<ul style="list-style-type: none"> Delivery of Hethersett Surgery 			✓		2026/27	£6,538,000

6.2 Capacity to Deliver and Risks

Effective management of a commercial portfolio in an entrepreneurial way requires a mix of skills including, but not restricted to buildings surveying, valuation, market intelligence, legal and financial and day to day operational management of buildings, including tenant liaison.

When considering the potential for the Council being active in the property investment market and managing its portfolio there are a number of key risks that the Council needs to be aware of:

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- Acquisition – There is a likelihood as the market becomes stronger that there will be increased competitive activity for the relatively small pool of high-quality investment properties in the area. This means it is highly likely that the Council will be one of several bidders for any good-quality assets available in the area and that from time to time it is likely that the Council will be an unsuccessful bidder. The Council, both councillors and officers, needs to be aware of this possible outcome. Due to the nature of the property market, decisions may also need to be taken quickly in order to put offers forward. Of course, offers can be subject to conditions and due diligence before proceeding to instructing legal advisors.
- Costs - Abortive costs, including legal costs, survey fees, officer time, all may be incurred in abortive transactions including costs for initial feasibility investigations. There may also be a lack of suitable sites / buildings of the quality the Council may wish to acquire or to ensure balance in its portfolio.
- Market risk - Property is an inherently riskier asset than other asset classes because of its physical characteristics, which need to be managed and maintained. This is ideally compensated by increased returns. However, the property market is not a certain market, and the Council may not achieve its target returns if market conditions significantly worsen. Many investment transactions happen prior to ever coming to the market. Information is key and getting to know about properties for sale is important, this can be done through contacting property owners and agents in the area and also engaging a specialist investment agent to act on the Council's behalf from time to time.
- Liquidity - Direct property investment such as the Council's commercial portfolio is relatively illiquid compared with other investments such as gilts, equities and indirect property investments. The liquidity of direct property investment depends upon the quality of the investment, the lot size and the prevailing economic climate. During periods of economic downturn, prime properties tend to be more liquid and more resistant in terms of retaining their value.
- Opportunity - The availability of property stock for investment in the area is likely to be generally limited. It is likely as the Council seeks to review and turn round its portfolio it will from time to time be frustrated through a lack of, or lost opportunities. Part of the counter to this will be to seek out as many appropriate opportunities as possible, build relationships and communicate to the market the Council's requirement and ability to perform.
- Management – The management of a commercial portfolio requires specific skills, expertise and capacity, which will be met through the utilisation of Big Sky. The nature of the Council's portfolio of direct ownership and direct management means that it can be resource intensive. As the Council's commercial portfolio has grown so the nature of the management burden has also grown and will continue to grow if new properties are added to the portfolio. This specific issue along with

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knowledge of the local market opportunities is critical. Sometimes it is difficult to combine the more operational aspects of day-to-day management of the portfolio with the more strategic aspects of identifying potential investment opportunities within a single role. Big Sky have recognised this and have increased their capacity to manage the additional work that has come with the growth in the commercial portfolio.

6.3 Monitoring Arrangements

It is important to measure the overall progress in the management of the commercial portfolio. Whilst the properties themselves are held for the medium to long term there needs to be monitoring over shorter timescales to reflect performance and the impact of any actions. The commercial portfolio will be kept under review by: -

- Corporate Leadership Team – to advise and seek agreement to decisions on specific actions prior to formal committee approval (e.g. acquisitions or disposals)
- An annual report on performance of the portfolio using the small number of performance indicators identified in 5.4.
- Formal review of each asset holding at least every two years using the acquisition and review criteria set out in Appendix B.
- Informal leader briefings as required.
- An update to this commercial property strategy on a periodic basis as the operating environment changes.

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7 Appendix A

7.1 List of Commercial Property Assets

FAM asset ref	Asset Code	Asset Description	Op/Non Op	Asset Type	Valuation Basis	AMP Cat 2024	NBV at 31/03/23
646	NRP001A	Ella May Barnes Building - Land	Non Operational	INV PROP	EUV	Offices (Commercial)	776,760.00
647	NRP001B	Ella May Barnes Building -Building	Non Operational	INV PROP	EUV	Offices (Commercial)	1,812,440.00
216	COS020A	Dereham Road, Costessey Caravan Site	Non Operational	INV PROP	FV	Caravan Site	291,300.00
309	COS020B	Dereham Road, Costessey Caravan Site	Non Operational	INV PROP	FV	Caravan Site	-
217	DIC008A	Rectory Road, Dickleburgh - Agricultural Land	Non Operational	INV PROP	FV	Land for rent	1,347,500.00
257	DIS047A	Park Road Diss - Land - Bus Depot Diss	Non Operational	INV PROP	FV	Land for rent	52,400.00
300	DIS047B	Park Road Diss - Land - Bus Depot Diss	Non Operational	INV PROP	FV	Land for rent	-
290	DIS077A	13 Vincess Road, Diss	Non Operational	INV PROP	FV	Industrial	86,000.00
291	DIS077B	13 Vincess Road, Diss	Non Operational	INV PROP	FV	Industrial	129,000.00
292	DIS078A	9-11 Mere Street, Diss	Non Operational	INV PROP	FV	Retail	186,305.00
293	DIS078B	9-11 Mere Street, Diss	Non Operational	INV PROP	FV	Retail	345,995.00
294	DIS079A	Unit 5b Owen Road Diss IP22 4ER	Non Operational	INV PROP	FV	Industrial	44,600.00
295	DIS079B	Unit 5b Owen Road Diss IP22 4ER	Non Operational	INV PROP	FV	Industrial	66,900.00
296	DIS080A	15 Vincess Road, Diss	Non Operational	INV PROP	FV	Industrial	84,640.00
297	DIS080B	15 Vincess Road, Diss	Non Operational	INV PROP	FV	Industrial	126,960.00
298	DIS081A	9 Park Road Diss	Non Operational	INV PROP	FV	Land awaiting development	22,100.00
299	DIS081B	9 Park Road Diss	Non Operational	INV PROP	FV	Land awaiting development	-
341	DIS082A	Unit B17 Owen Rd Diss - now includes Unit B19	Non Operational	INV PROP	FV	Industrial	179,800.00
341	DIS082B	Unit B17 Owen Rd Diss - now includes Unit B19	Non Operational	INV PROP	FV	Industrial	269,700.00
342	DIS083A	Unit B19 Owen Rd Diss - now included in Unit B17 Valuation	Non Operational	INV PROP	FV	Industrial	-
342	DIS083B	Unit B19 Owen Rd Diss - now included in Unit B17 Valuation	Non Operational	INV PROP	FV	Industrial	-
258	GIS001A	Gissing - Residential Development	Non Operational	INV PROP	FV	Land for rent	278,100.00
219	HAR037A	Rushall Road, Harleston - Agricultural land	Non Operational	INV PROP	FV	Land for rent	1,738,600.00
335	HAR048A	Unit 18A Harleston	Non Operational	INV PROP	FV	Industrial	216,520.00
367	HAR048B	Unit 18A Harleston	Non Operational	INV PROP	FV	Industrial	324,780.00
343	HAR049A	Unit 19A Harleston	Non Operational	INV PROP	FV	Industrial	98,240.00
368	HAR049B	Unit 19A Harleston	Non Operational	INV PROP	FV	Industrial	147,360.00
220	KET003A	Ketteringham Depot-Unit 1 & 2 Station Lane	Non Operational	INV PROP	FV	Industrial	109,480.00
221	KET003B	Ketteringham Depot-Unit 1 & 2 Station Lane	Non Operational	INV PROP	FV	Industrial	164,220.00
369	LOD019A	Loddon Business Centre	Non Operational	INV PROP	FV	Offices (Commercial)	158,845.00
222	LOD019B	Loddon Business Centre	Non Operational	INV PROP	FV	Offices (Commercial)	335,555.00
500	LST061A	Cob Lodge - Maple Park - Land	Non Operational	INV PROP	FV	Offices (Commercial)	17,430.00
613	LST061D	Cob Lodge - Maple Park - Building	Non Operational	INV PROP	FV	Offices (Commercial)	40,670.00
612	LST061C	Trumpeter House - Land	Non Operational	INV PROP	FV	Offices (Commercial)	279,210.00
593	LST061B	Trumpeter House - Building	Non Operational	INV PROP	FV	Offices (Commercial)	651,490.00
264	POR003A	Crafton House Land	Non Operational	INV PROP	FV	Offices (Commercial)	469,620.00
519	POR003B	Crafton House - Building	Non Operational	INV PROP	FV	Offices (Commercial)	1,095,780.00
		Shotesham Road, Poringland - Commercial Development Land	Non Operational	INV PROP	FV	Land awaiting development	400,000.00
267	SWN001A	Garden Plot, Station Close, Swainsthorpe	Non Operational	INV PROP	FV	Land awaiting development	200.00
228	WYM094A	Wym - Ayton Road - A368	Non Operational	INV PROP	FV	Industrial	50,426.62
228	WYM094B	Wym - Ayton Road - A368	Non Operational	INV PROP	FV	Industrial	75,639.92
229	WYM095A	Wym - Ayton Road - A369	Non Operational	INV PROP	FV	Industrial	22,167.40
229	WYM095B	Wym - Ayton Road - A369	Non Operational	INV PROP	FV	Industrial	33,251.11
230	WYM096A	Wym - Ayton Road - A370	Non Operational	INV PROP	FV	Industrial	43,770.75
230	WYM096B	Wym - Ayton Road - A370	Non Operational	INV PROP	FV	Industrial	65,656.13
231	WYM097A	Wym - Ayton Road - A371	Non Operational	INV PROP	FV	Industrial	28,541.24
231	WYM097B	Wym - Ayton Road - A371	Non Operational	INV PROP	FV	Industrial	42,811.86
232	WYM098A	Wym - Ayton Road - A372	Non Operational	INV PROP	FV	Industrial	68,984.07
232	WYM098B	Wym - Ayton Road - A372	Non Operational	INV PROP	FV	Industrial	103,476.10
233	WYM099A	Wym - Ayton Road - A373	Non Operational	INV PROP	FV	Industrial	31,925.57
233	WYM099B	Wym - Ayton Road - A373	Non Operational	INV PROP	FV	Industrial	47,888.37
234	WYM100A	Wym - Ayton Road - A374 & A375	Non Operational	INV PROP	FV	Industrial	68,645.63
234	WYM100B	Wym - Ayton Road - A374 & A375	Non Operational	INV PROP	FV	Industrial	102,968.44
235	WYM102A	Wym - Ayton Road - A376	Non Operational	INV PROP	FV	Industrial	37,396.92
235	WYM102B	Wym - Ayton Road - A376	Non Operational	INV PROP	FV	Industrial	56,095.39
236	WYM103A	Wym - Ayton Road - A377	Non Operational	INV PROP	FV	Industrial	125,333.27
236	WYM103B	Wym - Ayton Road - A377	Non Operational	INV PROP	FV	Industrial	187,999.90
237	WYM104A	Wym - Ayton Road - A378	Non Operational	INV PROP	FV	Industrial	66,333.00
237	WYM104B	Wym - Ayton Road - A378	Non Operational	INV PROP	FV	Industrial	99,499.50
238	WYM105A	Wym - Ayton Road - A379	Non Operational	INV PROP	FV	Industrial	29,556.54
238	WYM105B	Wym - Ayton Road - A379	Non Operational	INV PROP	FV	Industrial	44,334.81
239	WYM106A	Wym - Ayton Road - A380	Non Operational	INV PROP	FV	Industrial	186,758.98
240	WYM106B	Wym - Ayton Road - A380	Non Operational	INV PROP	FV	Industrial	280,138.48
241	WYM113A	Eleven Mile Lane, Sutton, Wymondham - Paddock Land	Non Operational	INV PROP	FV	Land for rent	25,200.00
270	WYM118A	Friarscroft Lane, Wymondham - Development Potential	Non Operational	INV PROP	FV	Land awaiting development	887,500.00
243	WYM122A	Former Wym Town Council, 14 Middleton St	Non Operational	INV PROP	FV	Offices (Commercial)	88,860.00
244	WYM122B	Former Wym Town Council, 14 Middleton St	Non Operational	INV PROP	FV	Offices (Commercial)	207,340.00
245	WYM153A	21 Penfold Drive, Gateway 11, Wymondham NR18 0WZ	Non Operational	INV PROP	FV	Industrial	77,440.00
246	WYM153B	21 Penfold Drive, Gateway 11, Wymondham NR18 0WZ	Non Operational	INV PROP	FV	Industrial	116,160.00
301	WYM156A	Friarscroft Lane, Wymondham - Garden Lane Rear of 23-37	Non Operational	INV PROP	FV	Land for rent	90,000.00
247	DIS030A	4 x Garages Thomas Manning Road	Non Operational	INV PROP	FV	Garages	60,700.00
310	DIS030B	4 x Garages Thomas Manning Road	Non Operational	INV PROP	FV	Garages	60,700.00
248	DIS072A	3 x Garages Chapel Street Diss	Non Operational	INV PROP	FV	Garages	59,450.00
311	DIS072B	3 x Garages Chapel Street Diss	Non Operational	INV PROP	FV	Garages	59,450.00
249	XXX003A	Plots in Long Stratton [11 plots?] not in use?	Non Operational	INV PROP	FV	Land for rent	1,900.00
312	XXX003B	Plots in Long Stratton	Non Operational	INV PROP	FV	Land for rent	-
684	ROX001A	Roxborough House - Land	Non Operational	INV PROP	FV	Offices (Commercial)	346,710.00
727	ROX001B	Roxborough House - Building	Non Operational	INV PROP	FV	Offices (Commercial)	808,990.00
Total							17,138,500.00

Commercial Property Asset Management Strategy

7 Appendix B

7.2 Acquisition and Review Criteria for Commercial Property Assets

Criteria	Scoring					Score
	5	4	3	2	1	
	Very good	Good	Acceptable	Marginal	Poor	
Location	Major prime	Micro Prime	Major Secondary	Micro Secondary	Tertiary	1-5
Tenancy Strength	Single Tenant with strong financial covenant	Single Tenant with good financial covenant	Multiple Tenants with strong financial covenant	Multiple Tenants with good financial covenant	Tenants with unstable or poor financial covenant	1-5
Tenure	Freehold	Lease 125 years plus	Lease between 50 & 125 years	Lease between 20 & 50 years	Lease less than 20 years	1-5
Occupiers Lease Length	Greater than 10 years	Between 7 & 10 years	Between 4 & 7 years	Between 2 & 4 years	Less than 2 years or vacant	1-5
Repairing terms	Full repairing & insuring	Internal repairing – 100% recoverable	Internal repairing – partially recoverable	Internal repairing – non-recoverable	Landlord	1-5
Physical condition	'Fit for purpose'; well-maintained with no outstanding repairs	In a good condition with only limited repair issues	In a reasonable condition with limited repairs required	In a poor condition with some repairs required	In poor state of repair with significant maintenance liabilities	1-5
					Maximum Score	30

Note: This is an initial framework which will be updated and refined in use. The exact criteria and scoring approach is subject to review.



Cabinet
18 March 2024

District Direct Funding:

Report Author(s): Kerrie Gallagher
Health and Wellbeing Senior Manager
01508 533741
Kerrie.gallagher@southnorfolkandbroadland.gov.uk

Portfolio: Cllr. Kim Carsok

Ward(s) Affected: All Wards

Purpose of the Report:

This report is to seek cabinet approval to enter a partnership agreement with Norfolk County Council to continue to deliver the District Direct service in the year 2024/25.

Recommendations:

1. Cabinet delegates authority to the Director of People and Communities to enter a fully funded partnership agreement with Norfolk County Council for the provision of District Direct in 2024/25.
2. Cabinet approves the proposal to pursue discussions with the Norfolk County Council and the Norfolk and Waveney Integrated Care Board with the aim of establishing a substantive and multi-year funding stream for this service from April 2025, delegating authority to the Director of People and Communities in consultation with the portfolio holder for Active and Healthy Lifestyles, to enter into such agreement.

1. Summary

- 1.1 District Direct is a flagship programme for the Council, supporting hospital discharge at the Norfolk and Norwich University Hospital (NNUH) by increasing

the support available to patients to ensure a smoother transition between hospital and home.

- 1.2 South Norfolk Council developed the programme with partners and provides this service to all residents in South Norfolk, Broadland, North Norfolk, Norwich and Breckland. A similar programme also exists for the James Paget in Gorleston, and Queen Elizabeth in King Lynn.
- 1.3 This support is based around giving practical help to ensure the patient's home is suitable for their needs in returning home, to aid recovery, and to reduce the likelihood of returning to hospital. This help may involve ensuring that the home is clean, the accommodation and furniture within it is fit for purpose, and that there is necessary wider social support available.
- 1.4 The arrangement is for £780,000 for 2024/25, which covers staff and a 10.2% management cost.

2. Background

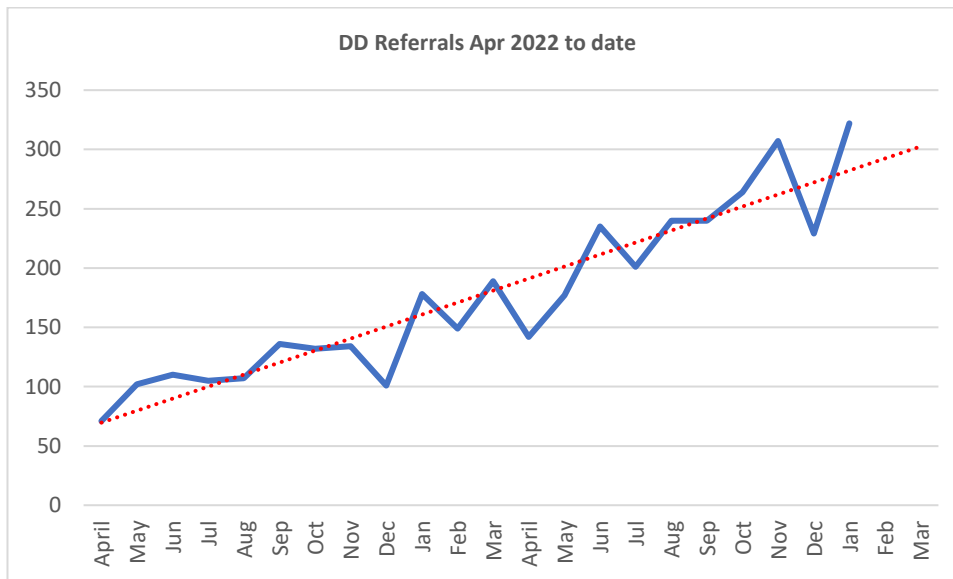
- 2.1 District Direct was initially conceived by the Council as a pilot project to expedite discharges from the NNUH. The Council has a strong track record of supporting residents, particularly those most at risk. Hospital discharge is a critical time for residents (particularly older ones), especially when they are placed back into their own home. The Council is responsible for local housing, and through our Help Hub approach were seeing too many residents struggling to cope after discharge. This was resulting in poorer outcomes for residents and additional costs for Adult Social Care through more care needs, and the NHS through reduced bed availability.
- 2.2 The Council has a track record of innovation, and working beyond our traditional boundaries to ensure our residents receive the support they need.
 - 2.2.1 By agreeing to provide services on behalf of the five district areas described in 1.2, we can work at a scale to support the NNUH requirements, at the same time as enabling additional support for our own residents.
 - 2.2.2 By working beyond the normal scope of District Council services, we are demonstrating the important role Districts have in supporting the wider health outcomes of residents.
 - 2.2.3 Our ingenuity in this area was recognised nationally when we were shortlisted for an MJ Award.
- 2.3 Around 80% of factors affecting people's overall health are socio-economic and non-clinical. The Council has a direct influence on health inequalities including the number, and quality of people homes, the immediate space around the home and the social / physical infrastructure of our communities.

- 2.4 This pilot project became operational in 2017 and was originally delivered by two full time equivalent members of staff. In the year 2019-20 and during early COVID the project ceased due to an absence of identifiable funding.
- 2.5 The project was re-instituted in April 2020 due to increased bed pressure at the NNUH during the pandemic. The project was jointly funded by Norfolk County Council (Adult Social Care) and Norfolk County Council (Mental Health Integrated Commissioning). There were, at this stage, three and a half full time equivalent staff. The service provided for any patients who are resident in the catchment area of the NNUH.
- 2.6 An impediment to efficacy was identified in the length of time taken to secure necessary funding via Adult Social Care to commit to small works, key safes, alarms etcetera. This was elongating hospital stays by up to fourteen days following referral on fitness for discharge. South Norfolk Council allocated monies from the Covid Recovery funds (COMF) to the project that were immediately available to officers 'on the ground'. This resolved the issue and reduced bed days occupied post referral to the service by ten days per referral.
- 2.7 The service has since attracted further funding from the ICB on an ad hoc basis using slippage from other projects. This has been sufficient to sustain and grow the project to its current level of service.
- 2.8 The Council is able to provide this discretionary service outside of the District as the programme is solely funded by external partners and not the Council's finances.

3. Current position/findings

- 3.1 The service currently employs eleven and a half full time equivalents including a Team Manager and has significantly expanded the scope of its delivery. It now provides a discharge facilitation service to all wards at the Norfolk and Norwich University Hospital as well as Hellesdon Hospital and the Julian Hospital. It also covers all the 'Discharge to Assess' community beds, overflow beds in community hospitals and private nursing home facilities. Dedicated officers are deployed in the Emergency Department to prevent unnecessary admissions and to liaise with the ambulance crews to prevent unnecessary transport to hospital for social reasons. From April 2023 the scope was broadened further to include an admission prevention function, taking referrals from community- based health and social care teams.
- 3.2 The service covers five district areas, South Norfolk, Broadland, Breckland, Norwich and North Norfolk. The arrangement with the other four districts has always been informal, but this is being reviewed as part of a County wide strategic independent living group. The reason we operate at this scale is that this broadly covers the Norfolk and Norwich University Hospital area and makes sense from a commissioning point of view and economy of scale.

- 3.3 The service now accepts more than three thousand referrals a year and achieves an estimated bed-day saving of in excess of seventeen million pounds.



- 3.4 The Norfolk and Norwich University Hospital, the Integrated Care Board and Adult Social Care have now reached the conclusion that District Direct is an integral part of the system to maintain bed availability in our local hospitals and believe the maintenance of this service should become part of mainstream funding.
- 3.5 The service is delivered with the agreement and collaboration of the other relevant Districts through the Integrated Housing Adaptation Team steering group.
- 3.6 The relevant Director in Adult Social Care has given a verbal undertaking to work towards securing funding for the service in the medium/long- term going forward from April 2025.
- 3.7 The service is nationally unique and has developed over a period of time on a needs-led basis. South Norfolk Council have shown themselves to be a highly credible and resilient deliverer of service. Continued delivery serves to cement the enduring relationship between the Council and partners in Health.

4. Proposed action

- 4.1 South Norfolk Council enters a partnership agreement with Norfolk County Council to fully fund the service at its current level for the year 2024/25. This agreement covers all salary costs with a 10.2% overhead for management costs.
- 4.2 Having agreed the partnership agreement for the forthcoming financial year it will be necessary to commence discussions at a timely juncture (within the next three months) to determine how the service can be augmented and how developments can be funded on a substantive basis going forward from April 2025.
- 4.3 The maintenance of this service going forward serves to further embed the partnership between South Norfolk Council, the Integrated Care Board and Adult

Social Care and enhances South Norfolk Council's standing as a key player in the Norfolk and Waveney Integrated Care System. This is a unique service nationally and places South Norfolk Council in the vanguard of the Prevention Agenda in Norfolk and Waveney. The provision for patients involving networks across a range of services and operating with multiple partners to ensure timely and effective service delivery has become essential to the operation of the hospitals' admission and discharge system.

4.4 The provision of this service ensures that hospital bed capacity is enhanced and the necessity for some hospital admissions is avoided to the benefit of South Norfolk residents as well as residents across the Norfolk central cluster.

4.5 There is a defined benefit to South Norfolk Council in the provision of District Direct in that it alleviates pressure on the Housing team. The reasons for this are threefold:

- Whilst the numbers are relatively small in comparison to general homelessness, residents that fall within this service are traditionally the hardest to assist due to their needs. The housing team has extra challenges with this cohort because finding suitable properties is difficult and securing and installing the required adaptations to assist with their longer-term housing solution take a long time. The District Direct service allows us to have this information incredibly early and to have an officer who can provide the required evidence speeds the process up significantly. Were this service not present, in addition to a very difficult challenge for the resident they will also be bed-blocking, the team having to source bespoke temporary accommodation which takes significant time and expense.
- This cohort is often the most vulnerable of our residents. Whilst in hospital there is a significant level of fear for what the next steps will be. Having a discharge direct officer at the hospital makes sure they have a face to talk to so that suitable reassurance can be provided, even if that reassurance is talking, collecting required evidence to mobilise the housing sector and guiding the resident through the issue. There is little chance that we could fulfil this within general housing services.
- The relationship with the hospital remains strong due to having the staff on site to act as a conduit. There is an understanding that we are doing all we can to source/adapt appropriate accommodation for discharge. This allows officers to get on with the job of sorting the adaptations, or obtaining the appropriate property, rather than facing challenges and frustrations from either party.

5. Other options

5.1 Withdraw from service delivery. This would obviate a potential worst case redundancy risk of £54,500 (see 6.1) in April 2025 should the contract be discontinued but this would be at the expense of significant reputational damage to the Council and a significant effect on hospital bed availability in the short/medium term in the current absence of any other credible provider.

5.2 Negotiate with Norfolk County Council to provide the service directly and consider moving the staff team across to their employ under TUPE legislation. This would remove the redundancy risk from the Council and safeguard the service but would potentially be damaging to the relationship with the ICB and could damage the credibility of other contracts for services currently provided to health and social care.

6. Issues and risks

6.1 **Resource Implications** – There is a risk of redundancy costs in April 2025. This risk is mitigated by:

- The stated current desire of partners to continue and enhance the service.
- The modest salaries and short length of service of the staff involved.
- A total redundancy cost not exceeding £54,500
- There is a predicted in year saving of £70,000 in the current financial year which will be carried forward.

6.2 **Legal Implications** – Any legal documents such as partnership agreements or service level agreements will be subject to the Council's policy.

6.3 **Equality Implications** – The nature of hospital discharge means that often those more vulnerable are significantly more disadvantaged. This service means that additional support is provided to those who need help the most.

6.4 **Environmental Impact** – None

6.5 **Crime and Disorder** – None

Risks –The risks for not continuing the service could result in redundancy costs, or staff having to move to other organisations.

7. Conclusion

7.1 Continuing this service through a partnership with Norfolk County Council would ensure that our residents (and those of other districts) have access to hospital beds or have the chance to remain at home and retain independence where this is a viable option.

7.2 There is a defined saving to our Housing team in both officer time and potential accommodation costs in the provision of District Direct.

7.3 We are at the threshold of some significant changes in the way in which health care is delivered both nationally and locally. It is desirable for the Council to maintain and enhance its partnerships within the Integrated Care System, ensuring that we are in a position of influence for the benefit of our residents.

8. Recommendations

- 8.1 Cabinet delegates authority to the Director of People and Communities to enter a fully funded partnership agreement with Norfolk County Council for the provision of District Direct in 2024/25.
- 8.2 Cabinet approves the proposal to pursue discussions with the Norfolk County Council and the Norfolk and Waveney Integrated Care Board with the aim of establishing a substantive and multi-year funding stream for this service from April 2025, delegating authority to the Director of People and Communities in consultation with the portfolio holder for Active and Healthy Lifestyles, to enter into such agreement.



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.snc@southnorthfolkandbroadland.gov.uk

What is a Key Decision?

A key decision is an executive decision which will:

- (a) result in the Council spending, or saving a significant amount compared with the Budget for the service or function the decision relates to; or*
- (b) to be significant in terms of its effects on communities living or working in an area, comprising two or more wards in the area of the Council, in that it will:*
 - (i) Have a long term, lasting impact on that community; or*
 - (ii) Restrict the ability of individual businesses or residents in that area to undertake particular activities; or*
 - (iii) Removes the provision of a service or facility for that community; or*
 - (iv) Increases the charges payable by members of the community to provide a service or facility by more than 5%; or*
 - (v) Have the potential to create significant local controversy or reputational damage to the Council; or*
 - (vi) Is a matter that the decision maker considers to be a key decision.*

When assessing whether or not a decision is a key decision the decision marketer must consider all the circumstances of the case. However, a decision which results in a significant amount spent or saved will generally be considered to be a key decision if:

- (a) the amount spent is £200,000 or more of revenue expenditure; or*
- (b) savings of £75,000 or more per annum; or*

(c) capital expenditure of £200,000 or more (where a decision makes a commitment for spending over a period of time, it is the total commitment that must be considered to see if it is a key decision).

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:

John Fuller (Chairman) – External Affairs & Policy

Daniel Elmer (Vice-Chairman) – Governance, Technology & Innovation

Kim Carsok – Healthy & Active Lifestyles

Richard Elliott – Finance & Resources

Keith Kiddie – Cleaner, Safer Environment

Graham Minshull – Supporting People

Lisa Overton-Neal – Stronger, Greener Economy

Subject / Decision	Decision Maker	Decision Due Date	Key Decision?	Responsible Officer	Portfolio	Public or Exempt
March 2024						
Asset Management Strategies	South Norfolk Cabinet	18 Mar 2024	No	<i>Debbie Lorimer, Director of Resources debbie.lorimer@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Finance & Resources	Public
	South Norfolk Council	25 Mar 2024				
Greater Norwich Local Plan: Adoption	South Norfolk Cabinet	18 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>	South Norfolk Portfolio Holder for Stronger, Greener Economy	Public
	South Norfolk Council	25 Mar 2024				
Q3 2023/2024 Performance, Finance & Risk Report	South Norfolk Cabinet	18 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

Subject / Decision	Decision Maker	Decision Due Date	Key Decision?	Responsible Officer	Portfolio	Public or Exempt
Tasburgh Neighbourhood Plan - Consideration of Examiner's Report	South Norfolk Cabinet	18 Mar 2024	No	<i>Richard Squires, Senior Community Planning Officer richard.squires@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Stronger, Greener Economy	Public
District Direct Funding 2024/25	South Norfolk Cabinet	18 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>	South Norfolk Portfolio Holder for Healthy & Active Lifestyles	Public
April 2024						
Conservation Area Appraisal for the conservation area of Hedenham & Ditchingham Hall	South Norfolk Cabinet	22 Apr 2024	Yes	<i>Chris Bennett, Senior Heritage and Design Officer chris.bennett@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Stronger, Greener Economy	Public
	South Norfolk Council	20 May 2024				
Conservation Area Appraisal for the conservation area of Howe	South Norfolk Cabinet	22 Apr 2024	Yes	<i>Chris Bennett, Senior Heritage and Design Officer chris.bennett@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Stronger, Greener Economy	Public
	South Norfolk Council	20 May 2024				

Subject / Decision	Decision Maker	Decision Due Date	Key Decision?	Responsible Officer	Portfolio	Public or Exempt
Car Parking Review	South Norfolk Cabinet	22 Apr 2024	Yes	<i>Dave Disney, Market Towns and Business Development Manager dave.disney@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Stronger, Greener Economy	Public
North Hethersett - Development of additional affordable housing land	South Norfolk Cabinet	22 Apr 2024	Yes	<i>Helen Skoyles, Housing Development and Enabling Manager helen.skoyles@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Stronger, Greener Economy	Fully exempt
	South Norfolk Council	20 May 2024				
Housing - Policy & Strategy Implementation & Updates	South Norfolk Cabinet	22 Apr 2024	No	<i>Mike Pursehouse, Assistant Director of Individuals and Families mike.pursehouse@southnorfolkandbroadland.gov.uk, Richard Dunsire, Strategic Housing and Independence Senior Manager richard.dunsire@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Supporting People	Public
	South Norfolk Council	20 May 2024				
Diss Dry Side Leisure & Public Realm	South Norfolk Cabinet	22 Apr 2024	Yes	<i>George Denton, Assistant Director of Economic Growth george.denton@southnorfolkandbroadland.gov.uk, Simon Phelan, Assistant Director of Community Services simon.phelan@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Healthy & Active Lifestyles	Fully exempt

Subject / Decision	Decision Maker	Decision Due Date	Key Decision?	Responsible Officer	Portfolio	Public or Exempt
DAHA Client Policy	South Norfolk Cabinet South Norfolk Council	22 Apr 2024 20 May 2024	No	<i>Mike Pursehouse, Assistant Director of Individuals and Families mike.pursehouse@southnorfolkandbroadland.gov.uk, Richard Dunsire, Strategic Housing and Independence Senior Manager richard.dunsire@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Supporting People	Public
Community Asset Strategy	South Norfolk Cabinet	22 Apr 2024	Yes	<i>Petra Maryon, Community Assets Manager petra.maryon@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Healthy & Active Lifestyles	Public
Food Enterprise Park - Local Development Order Consultation	South Norfolk Cabinet	22 Apr 2024	No	<i>Nina Cunningham, Strategic Growth Projects Manager nina.cunningham@southnorfolkandbroadland.gov.uk</i>	South Norfolk Portfolio Holder for Stronger, Greener Economy	Public

Subject / Decision	Decision Maker	Decision Due Date	Key Decision?	Responsible Officer	Portfolio	Public or Exempt
Housing System Procurement	South Norfolk Cabinet	22 Apr 2024	Yes	<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>	South Norfolk Portfolio Holder for Supporting People	Fully exempt