

Norfolk Strategic Framework – consultation version
Report by Planning Policy Officer

Summary: A consultation is taking place on the draft of the proposed Norfolk Strategic Framework. Comments are suggested and the Committee's views are sought on these. The final document, revised in the light of comments received, will be considered for approval by all the local planning authorities in Norfolk.

Recommendation: That the Planning Committee endorse the comments.

1 Introduction and Background

- 1.1 The Norfolk Strategic Framework (NSF)¹ is a document that is being produced by all the Local Planning Authorities (LPAs) in Norfolk, together with the involvement of relevant bodies such as the Environment Agency. The purpose of the NSF is to set out guidelines for strategic planning matters across the County, and beyond, and demonstrate how the LPAs will work together under the Duty to Co-operate through a series of potential agreements on planning related topics. A draft Framework has been put together by officers from the Norfolk LPAs, under the oversight of a member level group comprising representatives from all the authorities. The Authority's representative is the Chairman or the Vice Chairman of the Planning Committee.
- 1.2 Although the Framework will not be a statutory planning document, it will set out strategic matters to be taken account of in the production of Local Plans. Consequently, it is subject to a public consultation that commenced on 1st August 2017 and runs to 22nd September 2017. The results of this consultation will then be considered by the NSF group and the document amended accordingly. It is anticipated that each LPA will then approve the final Framework, and it will then be used to guide the LPAs in their strategic planning work. It is also anticipated that the Framework will be monitored and reviewed as necessary in the following years.
- 1.3 The Framework sets out a proposed Spatial Vision and shared objectives for the Norfolk LPAs, having regard to the main spatial planning issues of population growth, housing, economy, infrastructure and environment. These are set out at page 8 of the document. Related to these there are a number of proposed "agreements" which explain how the LPAs will seek to deal with the matters through their spatial planning role. These agreements are set out in bold in the document, so they are easy to identify. Whilst the Framework is

¹ <https://norfolk.citizenspace.com/consultation/norfolk-strategic-framework>

not a planning document in its own right, it can be seen as a guide for future planning work.

- 1.4 Whilst the Authority has been a partner in the production of the draft document, this does not preclude the submission of comments as part of the consultation process. It is not felt that there are any significant shortcomings in the draft but comments are included at Appendix A.

2 Conclusion

- 2.1 The Planning Committee is requested to endorse the comments.

3 Financial implications

- 3.1 Compliance with the Duty to Cooperate is important and actions consistent with the agreements within this document will be undertaken as appropriate in the Local Plan. The Authority did contribute funding to the production of the NSF and is likely to have to contribute further when the next steps in relation to the NSF and the Duty to Cooperate are decided.

Background papers: None

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Date of report: 21 August 2017

Appendices: APPENDIX A – Comments on the NSF

Comments on the NSF**General comments**

- 1) Separated needs could be brought together into an integrated approach. For example, the data related to obesity issues shows a vast cost to society suggesting a need for significant investment to reduce the expenditure in this area. A prime element of achieving that will be increasing walking, cycling and exercise in general suggesting a step change in this infrastructure. Although there is mention of such investment there are no tabulated details of schemes, costs, timing and funding sources (as there is with road investment for example). Neither is there close correlation of such investment with the Green Infrastructure details without that.
- 2) The same could be said of the water infrastructure. It notes that water resources will be stretched in meeting projected development but the emphasis on finding ways to strengthen water infiltration and its cross relationship with Green Infrastructure and the economic contribution of tourism is missed. Again, it might be implicit, but it does not draw out how problems can be addressed by suitable strategic planning in correlated issues.
- 3) Also within this section, the commentary on Essex and Suffolk Water who are a provider of water is not included.
- 4) The emphasis is on the traditional things of such policy documents: improving roads, housing and employment. Could the document build in cycling infrastructure, high quality housing that is climate adapted/ low carbon/ minimises flood risk/ sits within vital GI /and growth.
- 5) Agriculture occupies 75%+ of the spatial area but the NSF does not seem to cover this greatly. Agriculture is facing the potential of great change on the loss of the Common Agricultural Policy and how it is addressed in policy terms over the next two decades is critical – to both its economic contribution, adaptation to a changing environment, and the social impacts in the rural locations. Again an integrated approach covering land and water management, rural economics, resource protection and enhancement (e.g. soils, food and carbon sequestration) and Green Infrastructure could be drawn out.

Other specific points

- 6) The vision section (2.2) ought to refer to aspirations around the historic environment, health and low carbon aspirations. There could also be something about the County's assets like the Broads, Brecks and coast.
- 7) There does not seem to be reference to low carbon adaptation such as electric vehicles and the necessary infrastructure as it would seem to be a piece of development needing a strategic approach across the county. Although there is reference to climate change resilience and adaptation there is minimal coverage of how that will manifest itself.

- 8) Resource protection (soils, water quality and ecosystem services such as air quality regulation) does not seem to be mentioned. This would seem to be a critical part of a strategic framework.
- 9) The local distinctiveness of Norfolk is important to cultural identity and reflects local resources. There is limited reference to the value of retaining and enhancing this character as an underpinning element of attractiveness of places to live and work.
- 10) Section 5: Investment in resource protection, adaptation to a changing climate, management of flood risk, development of low carbon energy and products all have potential for improved economics. Norfolk has need of, and great potential in, exploiting these opportunities (and especially because of the advantages this can bring to other aspirations identified).
- 11) Bottom of page 28, last sentence – does this need to be finished off by saying ‘...tightly drawn around flood plains’?
- 12) Top of page 35. First sentence talks about ‘12 of which arise from Norfolk’. I do not understand this. Should that be 213 arise from Norfolk?
- 13) Page 46 under ‘coverage in Norfolk’. Weak rather than week.
- 14) Agreement 17. There could be landscape impacts of such infrastructure which will need to be considered in protected areas of the County.
- 15) 7.4 Water: can we build in the need to retain sufficient water to meet environmental needs? There is a growing concern that freshwater flows in the summer- which avoid toxin build up, retains habitat needs, maintains attractiveness for tourists, repulse saline incursion etc – are getting to or below minimum levels. There is also a need to retain winter flows to flush out pollutants.
- 16) P55 could benefit from reference to the Broadland Futures initiative seeking to take an integrated approach across the coast and the Broads to managing flood risk especially looking to the medium and longer term. This is being adopted by EA, NE and the other local authorities as a way forward. We can advise further.
- 17) Agreement 20. As written, the protection and enhancement of these assets relates only to the GI strategy. Is there merit in the Local Plans in general considering their impact on these assets so they are protected and where appropriate enhanced?
- 18) Agreement 20 – add a bullet point (c) ‘and the importance of retaining ecological connections between habitats’ (*e.g. to meet governmental targets such as Biodiversity 2020*). This would be a facet of building in resilience and adaption to a changing climate for example
- 19) Table 107; We note that two projects are included. Why these two projects? Are there others that need to be included? For example Sustrans are already promoting a pilot signage project in this area and NCC as highways authority, has been investing in 3Rivers Way to boost cycling network.

- 20) 2.3 Proposed Shared Objectives – could include sustainable development and protection of natural capital
- 21) p8 greenhouse gas emissions: there could be recognition of peatland protection within development and the role of soils and woodland in GHG emissions. The link to woodland and trees (location and area) and mitigating impacts of climate change and cleaning air quality could be made.
- 22) P9 To improve the quality of life – no mention of GI, nature and poor linkage between sections.
- 23) P9 To improve and conserve Norfolk’s environment by... Amend to Norfolk’s rich and biodiverse environment
- 24) P9 maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land; Brownfield sites can have higher value for biodiversity and natural capital than some undeveloped land.
- 25) P9 where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised;
- 26) P9 protecting and, where appropriate, enhancing biodiversity through the preservation of habitats and species and creating new habitats through development; recommend to delete ‘where appropriate’. The other objectives around e.g. saving energy are not qualified in similar ways. See also P58, agreement 20, delete ‘where appropriate’.
- 27) P9 providing a network of accessible multi-functional greenspaces;
- 28) P9 reducing the demand for and use of water and other natural resources.
- 29) Add to this ‘protecting water quality through enhanced sewerage schemes’. Add in ‘soil and air’ as natural resources.
- 30) It could be considered implicit that ‘blue infrastructure’ is part of green infrastructure, but this section of the document seems to miss the opportunity to highlight the importance of the water network generally in relation to GI. Rivers and other water bodies do not seem to be identified on figure 11 or 12. Reference should be made to them and their importance to GI.