

VISION & OBJECTIVES COMMENTS:

Response ID	Organisation	Answer	Officer Response	Action
ANON-3C85-CA87-P	Resident	Both are totally aspirational and hopelessly unrealistic in current Economic climate	Point Noted, however Norfolk authorities will work together to achieve the vision and objectives and monitor performance against these.	No change to NSF
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	I have no comment on Sect 2, but I ask that Agreement 1 at Sect 1.3 be amended to include: employment, economic, infrastructure and environmental needs. This shouldn't be limited to housing.	The wording used was to allow local plans that are not comprehensive (ie around specific targeted areas) to set different end dates where this is appropriate. Local plans would include all the elements highlighted but the wording is changed to make this clearer.	Update to Agreement 1 to include 'which seek to identify levels of Objectively Assessed Need for housing'
ANON-3C85-CA8T-K	Hockering Parish Council	It is essential that Norfolk retains its rural identity. Unsuitable housing developments and the dualling of roads must be seriously reduced or Norfolk will no longer be an area of outstanding natural beauty.	The NSF recognises the rural nature of the county and looks at ways to enhance this through the Green Infrastructure study completed as part of this work including the identification of Green Corridors.	No change to NSF
ANON-3C85-CAFT-1	Resident	If there is a clear desire to engage communities in development at a local level, significant changes will need to be made to processes which currently offer residents pre-decided choice (often none are suitable) and are presented in a way which is a barrier for many residents to read. The opportunities to engage (as this one is) are often only for the educated given the complexities of language and technical terms, meaning those who are often most negatively affected by development are least able to raise their own concerns.	Point noted and authorities will give consideration to this when completing local plans	Point to be highlighted to authorities
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	Much of Norfolk is too dependent on tourism/visitors. Let's accelerate the diversification and attracting high tech/high wage businesses. ie. Downham market is set to gain from the "Cambridge effect" leapfrogging over Ely and Littleport. Let's see more of it. However I fear they will be deterred by the poor rail link from Norwich and the indecision over services from Kings Lynn. That is before you consider the poor road network, North to South from mid and west Norfolk and even worse east to west from Norfolk to the midlands and heading northern England.	The points raised are noted, section 5 of the NSF supports diversification and attracting high tech/high wage businesses and various initiatives are being led by local authorities to encourage this eg Norwich to Cambridge Tech corridor, A47 corridor etc.	No change to NSF
ANON-3C85-CAXS-J	Resident	lack of infrastructure - improved roads, hospitals, GP's, faster broadband to facilitate business growth in the more rural areas, much better mobile coverage and of a higher standard - 3G/4G- is vital to achieve any objectives	The points raised are noted and supported within various sections of the NSF	No change to NSF
ANON-3C85-CAXF-5	N2RS - No to Relay Stations	I would agree that it is a largely rural county with a relatively low population density with a very considerable stock of historic assets which are now under threat.	Support Noted	No change to NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	The county is being changed forever by an overload of housing	Noted	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited supports the Proposed Spatial Vision and Proposed Spatial Objectives. Attleborough Land Limited understands Attleborough's strategic position in the context of the Breckland District Council Local Plan and Norfolk Strategic Framework. The SUE will be delivered in accordance with the Spatial Vision and Objectives. Attleborough Land Limited agrees that market towns like Attleborough can offer a very attractive quality of life to residents. Attleborough Land Limited is committed to ensuring that the SUE will enhance the quality of life for both existing and new residents. The attached Design & Access Statement sets out the Vision for the SUE, and explains the design evolution of the indicative masterplan submitted with the planning application. ADDITIONAL INFO SUBMITTED - Attleborough D&A Statement	Support Noted	No change to NSF
ANON-3C85-CAJG-R	Resident	The vision does not recognise that full time residents in North Norfolk have limited access to quality jobs, affordable housing, shops, swimming pools, roads and other public services which this summary suggests is already available in Norfolk.	The vision in the NSF is intentionally aspirational and forward looking so doesn't address the current infrastructure and economic disadvantages faced in the county. These matters are adequately recognised elsewhere in the document. The NSF recognises the rural nature of the county and looks at ways to address the issues.	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 2.1 It is not clear whether over half the population live in the built up areas of Norwich, Great Yarmouth and King's Lynn or whether the residents of the 21 market towns contribute to this half. In the first paragraph of page 7 it says "there is a highly skilled and versatile population" but also says "skill levels in the workforce are relatively low." These must be different sections of the population. Para 2.2 - the Spatial Vision - is obviously optimistic in particular with regard to housing needs and transport. Para 2.3 - Shared Objectives - all 27 are laudable and should be supported but may well be difficult to achieve - particularly aligning job growth with housing provision and the locations of workplaces and homes. Car ownership is essential in the sparsely populated rural areas where public transport is non-existent, owners will rely on Park & Ride services to access the built up areas. Developers are too ready to claim that costs involved in using brown field sites excuse them from the obligations of including affordable housing, so the proportion achieved is lower than anticipated.	Half the population covers Norwich, Great Yarmouth and King's Lynn and the 21 market towns. Point 2 and 3 noted.	No change to NSF
ANON-3C85-CA6U-J	Resident	Your Vision should include a railway reopening strategy to address the car crisis in Norfolk. There is big potential for reopening of some key routes (e.g. Norfolk Orbital Railway) to unlock tourism and employment opportunities and to relieve congestion.	One of the aims of producing the Norfolk Strategic Framework is to agree shared objectives and priorities to improve outcomes and help shape future plans. The introductory text to the document notes that "This document is intended to be strategic in nature. It provides only an overview of background information and shared research." Section 7 goes on to state "Further work on infrastructure priorities will continue before the finalisation of the NSF but it should be noted that these short term priorities which are listed in this document will only represent a fraction of the overall infrastructure investment needed to deliver the growth ambitions of the NSF" Given this, I am afraid that, whilst the local authorities involved in producing the document might support the aims of the Melton Constable Trust and those of the community rail partnerships, the stage of the project (for orbital rail), the likelihood of it being achievable in the short to medium term, and its role in serving the transport needs of the county (when weighed against the projects within the framework such as Norwich to Cambridge rail) all mean that it is considered premature to consider it of sufficient strategic standing to merit detailing its inclusion in the framework. We are aware that the Trust has been speaking to the various local authorities including Norfolk County Council and are sure that continuation of this dialogue will help to move forward with the project.	No change to NSF

ANON-3C85-CA6V-K	Diss Town Council	<p>It is felt there is insufficient reference to the infrastructure required to support the economy and employment. There is much reference to enhancing productivity, skills and education, co-locating future employment and housing and ensuring digital connectivity and transport infrastructure around 'main settlements' and connections with the other areas. But as there are existing issues where infrastructure is required to support current employment areas (ie Vincennes Road, Diss), it is considered this ought to be given a stronger priority within the strategic framework as there may well be other areas where this is an issue.</p> <p>A proposed amendment to the wording of Agreement 2 is: Its settlements and key infrastructure will be physically resilient to 'future growth and' the impacts of climate change. ...and of the first bullet point at 2.3 would be: facilitating the development 'and infrastructure' needed to support the region's business sectors and clusters... Under: To improve and conserve Norfolk's environment by: ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, protected landscapes, Broads and coast; ...it is felt that the river valleys are so important that they should be included at the first bullet point.</p>	<p>The first points made are noted but they are deemed to be a matter for local plans to address and not a strategic issue. The suggested section 2.3 change is agreed with and has been updated River valleys should already be protected by various local plan designations</p>	Add 'and infrastructure' to Section 2.3
ANON-3C85-CA62-F	Resident	<p>This section contradicts itself. It is simply not possible to "facilitate development" and improve and conserve Norfolk's environment, as development (especially large scale building of houses, business parks and roads such as the NDR) has an entirely negative effect on the environment. Destroying green spaces does not "improve the quality of life", except perhaps for the developers themselves, who can afford to live in an area of the county that they haven't trashed. (The rest of us are stuck where we are.) The document mentions a "major shift in travel away from car use towards public transport, walking and cycling" but the NDR has removed the last quiet roads out of Norwich to the countryside (e.g. Smea Lane, Quaker Lane) and made safe and pleasant cycling in the north of the city a thing of the past. The document needs to include access to walks and cycle routes. "Ensuring all our communities are able to access excellent sporting facilities" is laudable but we need to encourage people to walk and cycle too. These are free, unlike organised team sports. There is sometimes a conflict between the two, as in Norwich Rugby Club's move to next to the River Yare at UEA, which will have a detrimental effect walkers' enjoyment of the area. (It will also add to traffic and parking problems.)</p>	<p>The thrust of this comment is disagreed with. Through provision of green infrastructure and high quality design it is possible to both increase the volume of development as well as the quality of life on offer to residents.</p>	No change to NSF
ANON-3C85-CAJF-Q	Resident	<p>The vision and objectives are laudable but are not entirely deliverable. It is better to not have as your vision and objectives things which are not in your legal ability to deliver. For example: 1) Proposed spatial vision says "residents will have choice about how they meet their demand for local travel" - but this is reliant for most trips on a good bus service which is widely not available even in (certainly one of) the larger urban areas because of the business model of the private supplier of the services there. Are you proposing regulatory interventions to enable you to take over the provision of the County's bus service? If not, then you cannot, in practice, deliver your aspirations, no matter how worthy. 2) Shared objectives include that by 2036 to realise the economic potential of Norfolk and its people "by fully exploiting the economic opportunities offered by the economic success and global reputation of Cambridge. However, the rail link between King's Lynn and Cambridge is being worsened - by design - from December 2018, and you are powerless to stop that happening. You cannot therefore, in practice, deliver your aspirations, no matter how worthy. 3) As (2) "by ensuring effective and sustainable transport infrastructure between and within Norfolk's main settlements. You may put in the infrastructure but service delivery, which is key to delivering this objective, is not in your hands but those of private transport suppliers. Additionally, in King's Lynn the only bus priority measure is now being considered for withdrawal and the section of road opened for all traffic which negates and sets back delivery of this objective in that town. 4) As (2) to reduce Norfolk's greenhouse has emissions as well as the impact from, exposure to and effects of climate change by "locating development so as to reduce the need for travel" and "effect a major shift in travel away from car towards public transport, walking and cycling". Again, these aspirations are frustrated by the fact that you cannot deliver because you do not control the means of delivery. Even where you can influence it through (such as) section 106 agreements with developers, these are not enthusiastically delivered to really show intent to engage a major shift away from car, as evidenced in King's Lynn by both the NORA and Kings Reach developments.</p>	<p>Views noted but it is considered that having an aspirational vision and objectives is appropriate in a document such as the NSF.</p>	No change to NSF
BHLF-3C85-CA6A-X	BA	<p>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. 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.</p>	<p>6) vision currently reflects the importance of natural and built environments, and objectives go on to add detail on environmental matters. This is considered appropriate although it is noted that specific reference to the brecks could be introduced in the environment objectives. 7) Noted, this will be included within the infrastructure section. 8) Noted such matters are addressed generally by environment objectives but more specific reference is not considered necessary. 9) Agree and updated 20) Noted, matter covered by other objectives 21) Noted, specific matter to be addressed in local plans 22) GI and natural environment is addressed in objectives 23) Agree to change 24) Noted 25) Quote from NSF only 26) Agree to take out 'where appropriate' 27) Quote from NSF only 28) Quote from NSF only 29) Water quality covered by general reference to environmental aspects</p>	<p>Updates to NSF as follows: For point 6) include reference to Brecks in objective on Norfolk's environment. For point 7) section 7 will be updated to include a transport agreement which will make reference to electric vehicles 9) Update environmental objective to include locally distinctive 23) Update document where suggested 26) Update document where suggested 29) Add the following to the environmental objective: Protecting and enhancing water, air, soil and other natural resource quality where possible.</p>
BHLF-3C85-CA34-E	Norfolk Geodiversity Partnership	<p>Strategic Objectives (page 9) No mention of conserving geodiversity. This is a requirement, as per NPPF sections 109 and 117, so needs mentioning here. <protecting sites of geodiversity interest and, where appropriate, enhancing them as part of development.> If it is not mentioned as a separate bullet point then it needs adding to bullet point 1: <ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, geodiversity assets, protected landscapes, Broads and coast;>.</p>	<p>Agree and reference to geodiversity is added to the Norfolk environment objective and in section 2.1.</p>	<p>Reference added to geodiversity in the Norfolk environment objective and in section 2.1.</p>
BHLF-3C85-CA38-J	Pegasus Group on behalf of Intu	<p>Suggested amendments 2.2 Proposed Spatial Vision Introduce and additional sentence: "Town centres will be the focus for the future retail and leisure needs of the county". 2.3 Proposed Shared Objectives 1): To realise the economic potential of Norfolk and its people by: Introduce an additional bullet point: Recognising the role of town centres as a focus for investment and enhancing the quality of life for residents. 4): To improve the quality of life for all the population of Norfolk by: Introduce an additional bullet point: ensuring a positive vision for town centres to enable sustainable economic growth and provide a wide range of social and environmental benefits.</p>	<p>Regarding the first and third points, it was felt that these are better addressed by the suggested section 2.3 update, with a minor wording change. Therefore the section 2.3 update is agreed and included.</p>	<p>Update objective to include 'Recognising the role of city centre and town centres as a focus for investment and enhancing the quality of life for residents.'</p>

<p>BHLF-3C85-CA3P-A</p>	<p>Heaton Planning Limited on behalf of Brett Aggregates</p>	<p>Agreement 1 -The document sets a number of proposed 'shared agreements' for matters including economic development, housing provision, infrastructure provision and environmental matters. Given the strategic nature of the document and steer for development and growth, the agreement should not specify solely housing needs. We would suggest rewording the agreement as follows: 'When preparing new Local Plans, the Norfolk Planning Authorities will produce documents which provide for the development needs of their areas until at least 2036'.</p> <p>Agreement 2 seeks to ensure that in preparing Local Plans, the Norfolk Planning Authorities seek to positively contribute to the delivery of a shared vision. The aim of the document is to provide general conformity to planning matters/issues within the County over the Plan period. Despite the common growth agenda for the County, the document contains no reference to the provision of aggregate to meet the anticipated demands of development and infrastructure. This is in our view a fundamental matter for the County to consider in steering development over the Plan period. The County Council are committed to the objectives of the Strategic Framework, and the County/Mineral Planning Authority is intending to review the Minerals Local Plan to the same timescales -2036. There is no reference within the document to the need to provide for a 'steady and adequate supply' of minerals to meet the development and infrastructure needs of the County over the Plan period. In addition, although the District Authorities will not have statutory responsibility for Mineral Plan making nor determining applications for minerals development, all Planning Authorities have an obligation to safeguard known mineral resources as per the guidance contained within section 13 of the National Planning Policy Framework.</p> <p>In light of the above, we would suggest that the strategic vision should include reference to, 'the safeguarding of mineral resources and the sustainable use of natural mineral resources'.</p>	<p>Agreement 1: Section 3.1 makes clear that this document does not seek to address the minerals and waste plan which is already addressed by the Norfolk wide Norfolk Minerals and Waste Local Plan, this is currently being produced and will cover the period up to 2036.</p> <p>Agreement 2: It is not considered necessary to amend the strategic vision of the NSF to contain the requirement to safeguard mineral resources and the sustainable use of natural resources because these requirements are already set out in the NPPF (paragraphs 7, 143 and 144) and therefore do not need to be repeated in the NSF. Local Plans must be consistent with national policy in order to be found 'sound' at examination.</p> <p>Agreement 3: It is not considered necessary to amend the shared objectives for Norfolk as suggested because they would simply be repeating the requirements of the NPPF (paragraphs 143, 144, 145 and 7). Local Plans must be consistent with national policy in order to be found 'sound' at examination.</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CA33-D</p>	<p>Norfolk Area of the Ramblers</p>	<p>Spatial vision The Spatial Vision (agreement 2) proposed in the Norfolk strategic Framework is that by the middle of the 21st century, Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. The natural and built environments will be enhanced through, inter alia, safeguarding of current assets and networks, improving both biodiversity and the quality of life for residents. A good relationship between homes and jobs is seen as minimising the need for travel which will be aided by digital connectivity with High Speed broadband planned to reach 95% of the population by 2020. To improve the quality of life for all the population of Norfolk it is intended to ensure that all communities are able to access sporting facilities and health services. Comment: Access to sporting facilities is clearly important. However for reasons stated in our comments above there will also be a growing demand, particularly from the over 50s, for access to facilities for safe walking and cycling in the open air and the attractive rural environment. Leisure walking is a more experiential activity than the journey based walking in the built up areas. This has implications for maintenance and development of the rural and suburban green infrastructure needed for these activities. It will also be influenced by any changes to agriculture and in the rural landscape on which the report is silent.</p>	<p>Agree and wording updated in objectives to include reference to informal recreation under quality of life objective. Please note that PROWs are part of GI in section 7 and will be referenced here.</p>	<p>Include reference to informal recreation under quality of life objective</p>
<p>BHLF-3C85-CA3U-F</p>	<p>TETLOW KING PLANNING</p>	<p>We note Agreement 1, which is an important starting point for each of the authorities to consider, and the June 2017 SHMA Update. However, in light of this month's consultation from the Government on the potential changes to assessing housing need we note that there may be a need in the short term for a review of local housing needs. The Government's consultation documents suggest there may be a greater annual need for a number of the local authorities to take into account, should the new methodology be adopted.</p> <p>Agreement 2 is also supported, as it provides a very clear ambition to meet local housing needs. Delivering housing that meets the full spectrum of housing needs requires developments to also reflect differing aspirations, as many people seek to own their own home. The Government's intention for all major developments to be delivered with at least 10% affordable home ownership options will be met not only with the now traditionally accepted intermediate models, but also rent to buy. We note here that our response to the Housing White Paper earlier this year emphasised that rent to buy is not an intermediate model, but a hybrid that requires separate definition, as with a number of the other models set out in that consultation (at Box 4). It is important to note that Alok Sharma, Housing Minister, recently confirmed in the House of Commons that the new definition of affordable housing to be included in the next iteration of the NPPF is to include rent to buy. The SHMA update references the potential changes to the definition of affordable housing, and though this does not directly reference rent to buy, it is right in acknowledging that many potential owner occupiers struggle to save a sufficient mortgage deposit to purchase a home. Rentplus seeks to bridge this gap by providing families with a home that is rented at an affordable level for a set period to enable savings to be built up, before purchasing the home outright.</p>	<p>Points raised are noted but no changes to agreements 1 or 2 are considered necessary in response, though the housing section will consider implications of the new methodology and emerging government policy towards the definition and delivery of affordable housing.</p>	<p>No change to NSF</p>
<p>ANON-3C85-CA6Y-P</p>	<p>King's Lynn Business Improvement District Ltd (KLBID)</p>	<p>1 KLBID represents the business interests located in a defined area which equates to King's Lynn town centre. It welcomes the opportunity to input to the draft Norfolk Strategic Framework (NSF) and does so from a largely West Norfolk, and especially King's Lynn perspective.</p> <p>2 We broadly support the vision and objectives set out in the NSF. However we have doubts as to the deliverability of some of them, especially where provision of services lies with the private sector, which cannot be required to work in accordance with the NSF, especially where it compromises their duty to secure best value for their ratepayers. Our concerns in this respect lie mainly in the provision of transportation services and are discussed in answer to question 15.</p> <p>3 We also have concern that the different economic and demographic links of West Norfolk, having more in common with Peterborough and especially Cambridge, are not properly recognised in the NSF. As a result, we believe that either the Borough Council will have to change planning policy considerably to accord with the vision, objectives and agreements contained in it, or it will be largely a dysfunctional and irrelevant document insofar as this area is concerned. This can be overcome by writing into the NSF a greater recognition of these differences and ensuring that the vision, objectives and agreements are proofed against West Norfolk's differences rather than what appears currently, to largely ignore them.</p>	<p>In drafting the NSF and particularly in describing the functional economic areas there was considerable effort to recognise the strategic importance of the links between areas in the west of the county and parts of Cambridgeshire and Lincolnshire to the rest. Furthermore the framework recognises the economic opportunities offered for the whole county by the economic success of Cambridge and has regard to the GCGP economic strategy whilst inevitably issues maybe able to be drawn out more explicitly it would be better if these specific areas where there is a need to address matters are identified individually.</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CA3J-4</p>	<p>The Somerleyton Estate</p>	<p>Comments about Section 2 - Vision and Objectives Section 2 sets out the shared vision and objectives. It states that Norfolk is a diverse County with a diverse economy and focusses on hi-tech industries and the offshore energy sector. As one of the key sector industries in Norfolk tourism and the environment upon which it depends is conspicuous by its absence and should be included. In Section 2.2 the Proposed Spatial Vision sets out a shared vision to guide the Norfolk Planning Authorities in preparing their local plans. Assuming that tourism and the environment are embodied in the term "current assets and networks" the Somerleyton Estate would suggest the following amendment (bold and underlined) to the shared vision: "By the middle of the 21st century Norfolk will be increasingly recognised nationally for having a strong and vibrant economy providing high quality economic opportunities for residents in urban and rural areas. Its settlements and key infrastructure will be physically resilient to the impacts of climate change. The natural and built environments will be enhanced through the regeneration of settlements, safeguarding and enhancement of current assets and networks, improving both biodiversity and the quality of life for residents and visitors alike. Housing needs will be met in full in socially inclusive communities. The County will be better connected by having good transport links to major cities in the UK and Europe and excellent digital connectivity. A good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel". In Section 2.3 Proposed Shared Objectives please add the following bullet points under the sub-headings for Agreement 3: "To realise the economic potential of Norfolk and its people by:" •Supporting the County's tourism offer and the environment upon which it relies. "To reduce Norfolk's greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change by:" •Supporting and facilitating indigenous tourism development. Also in Section 2.3 under the sub-heading "To improve and conserve Norfolk's environment" the following bullet point objective is noted as particularly important by the Somerleyton Estate in protecting assets such as the Fritton Lake Resort: •Protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements".</p>	<p>No specific sectors are addressed in the vision and objectives however it is agreed to enhance the tourism reference in the economic section.</p>	<p>Tourism Reference added in Economic Section</p>

ANON-3C85-CA3V-G	Resident	The objectives of moving travel from car to public transport and of promoting regeneration and renewal of disadvantaged areas would both be consistent with assessing the feasibility of restoring rail services to market towns such as Dereham and Fakenham. Provision for such assessment would be beneficial.	One of the aims of producing the Norfolk Strategic Framework is to agree shared objectives and priorities to improve outcomes and help shape future plans. The introductory text to the document notes that "This document is intended to be strategic in nature. It provides only an overview of background information and shared research." Section 7 goes on to state "Further work on infrastructure priorities will continue before the finalisation of the NSF but it should be noted that these short term priorities which are listed in this document will only represent a fraction of the overall infrastructure investment needed to deliver the growth ambitions of the NSF" Given this, I am afraid that, whilst the local authorities involved in producing the document might support the aims of the Melton Constable Trust and those of the community rail partnerships, the stage of the project (for orbital rail), the likelihood of it being achievable in the short to medium term, and its role in serving the transport needs of the county (when weighed against the projects within the framework such as Norwich to Cambridge rail) all mean that it is considered premature to consider it of sufficient strategic standing to merit detailing its inclusion in the framework. We are aware that the Trust has been speaking to the various local authorities including Norfolk County Council and are sure that continuation of this dialogue will help to move forward with the project.	No change to NSF
ANON-3C85-CA6C-Z	EA	We welcome the inclusion of the statement in relation to the 'variety of environments valued for their land scape and biodiversity' in terms of the vision, we would like to see a firm commitment to protect and enhance these environments. We would also like to see a commitment to improving water quality in the vision.	Noted and environmental object updated to include water quality	Bullet added : Protecting and enhancing water, air, soil and other natural resource quality where possible.
ANON-3C85-CA61-E	Define Planning & Design Ltd	<p>The proposed spatial vision appropriately recognises the importance of meeting the full housing needs through socially inclusive communities and to ensure a good relationship between homes and jobs. In acknowledging the significance of delivering the anticipated growth within Norfolk, greater emphasis should be placed on the role that all sustainable settlements play within the County, both urban and rural, in achieving these objectives. The expansion of market towns offers great potential for the delivery of sustainable development to meet housing needs and their further growth will strengthen their roles as important service centres for the wider rural hinterland in the long term.</p> <p>Similarly, whilst it is appropriate to highlight the more significant role of the major urban areas in realising the economic potential of Norfolk and its inhabitants, the significant contribution played by market towns in the County to achieve this objective, such as at Fakenham where strategic growth to the town is already proposed, must not be underestimated and should be highlighted.</p> <p>Within the New Anglia Local Enterprise Partnership Economic Strategy, Fakenham is identified as a Growth Corridor, and is anticipated to provide a significant proportion of both housing and employment growth in North Norfolk. This further reinforces the significant role that market towns, such as Fakenham, play towards achieving the shared objectives to improve the alignment between the locations of workplaces and homes.</p> <p>As such and in order to secure the vision for growth across the County, it is critical that this framework seeks to enable development in locations such as Fakenham through the provision of critical infrastructure, notably highways, drainage and community infrastructure to support future growth.</p>	Point noted and authorities will give consideration to this when completing local plans	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	<p>We support the core values and principles set out in Section 2 of the document.</p> <p>We recognise that there is the need for significant structural change to enhance local communities' quality of life, provide skilled jobs and education, and sustain local ecological processes and economies. These aspirations are shared by the New Anglia Local Enterprise Partnership (LEP), which has an aspiration to create 95,000 jobs and 117,000 more homes in the period up to 2026 for Norfolk and Suffolk, along with the need to preserve our unique landscape quality and focus on food production as a core industry.</p> <p>We support the growth of existing towns, particularly where there is an economic and social need for expansion to secure future communities and local economies. This is particularly where the negative impacts are either insubstantial or can be consensually mitigated against and where opportunities exist for significant environmental and/or social improvements. Furthermore, reliance on a large number of small and medium sized sites places a question mark over the certainty of delivery and will also cause extreme difficulties in managing housing trajectories. This can mean that a larger number of communities are affected by development. Because of an insignificant quantum of development, infrastructure, community, employment and economic benefits cannot reliably be funded or implemented.</p> <p>We therefore request that where the Framework sets out a series of bullet points to address housing need, to add the following:</p> <ul style="list-style-type: none"> •Undertaking a strategic review for a suitable planning and social guidelines for creating and locating a new garden town or village community, which will provide a high-quality development meeting established and innovative garden city principles and delivering needed local infrastructure improvements, whilst bettering local communities and enhancing the local environment.' 	Noted the matter of a new town is for local plans to address.	No change to NSF

ANON-3C85-CA3C-W	Resident	<p>In order to achieve the aims of improving public transport, the strategy should consider re-establishment of lost rural rail links.</p> <p>This would ease the burden on the road network and prove to be far 'greener'.</p>	<p>One of the aims of producing the Norfolk Strategic Framework is to agree shared objectives and priorities to improve outcomes and help shape future plans. The introductory text to the document notes that "This document is intended to be strategic in nature. It provides only an overview of background information and shared research." Section 7 goes on to state "Further work on infrastructure priorities will continue before the finalisation of the NSF but it should be noted that these short term priorities which are listed in this document will only represent a fraction of the overall infrastructure investment needed to deliver the growth ambitions of the NSF"</p> <p>Given this, I am afraid that, whilst the local authorities involved in producing the document might support the aims of the Melton Constable Trust and those of the community rail partnerships, the stage of the project (for orbital rail), the likelihood of it being achievable in the short to medium term, and its role in serving the transport needs of the county (when weighed against the projects within the framework such as Norwich to Cambridge rail) all mean that it is considered premature to consider it of sufficient strategic standing to merit detailing its inclusion in the framework. We are aware that the Trust has been speaking to the various local authorities including Norfolk County Council and are sure that continuation of this dialogue will help to move forward with the project.</p>	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	<p>NB It is difficult to comment on detailed content in this format and without paragraph numbering.</p> <p>The statement on the economy again misses key areas which are essential to understanding and describing the economy of Norfolk and its economic potential for example world leading agriculture, centre of medical excellence and spin-off, growing rural entrepreneurial economy albeit focussed at present in key coastal areas, cultural digital and creative industries in central Norwich, healthy and growing tourism & leisure proposition.</p> <p>It should be stated that Norwich is the regional retail centre and has the biggest physical catchment of any city in the UK outside London (source: open source Space Syntax modelling, Cities Foresight Group BIS) This leads to intense pressures of accommodating commuting at key but predicatable periods on a daily basis, particularly within the historic urban core.</p> <p>The para on connectivity sounds negative - this should be redrafted in a positive tone setting out the positive connectivities. The emphasis on long distance connections via road and rail is potentially wrong headed. In order to reduce congestion we need to consider a multi modal local transport network including improved links to Cambridge, reinstatement of local rail to service commuter trips into and out of Norwich and to underpin more sustainable tourism to the coastal areas. The county should stop trying to produce a competing economic/locational offer to geographically central locations such as Peterborough and instead focus on the essential Norfolk proposition. The self contained nature of teh Norfolk economy with Norwich at its core produces a model of a self contained city-region with a highly dependent hinterland and relatively high local economic capture. Together with the very high quality of life proposition, this potentially puts Norfolk and Norwich in an excellent s to benefit from the trend in locational dynamics that is increasingly being recognised by Property Research organisations such that the smart money (both residents and businesses) are chasing quality of life. Savills have written extensively on this point as have other market commentators. The present emphasis on road connections in the para and under investment in long distance infrastructure reflects and old economy view of locational dynamics.</p> <p>It sketches an approach to sustainable smart growth but stops short in fully embracing this. A critical omission at para addressing reducing greenhouse gas and resource conservation - contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services; the paper should explicitly set out that settlements should be 'smart footprinted' to ensure that land use supports walkability and trip reduction, through colocation, mixed use and careful disposition of uses to support public transport viability and accessibility.</p> <p>delivering high quality, energy efficient homes in attractive (living environments) which make a positive contribution to the health and well-being of communities insert ' neighbourhoods or communities' in place of 'living environments' - this is not a unit of development that either residents nor developers recognise: add 'and which underpin Norfolk's place competitiveness' .(ie the county's unique economic proposition).(continued below)</p>	<p>Wide ranging response setting out a significant number of points and essentially proposing a different vision to the one that is currently encapsulated within the shared vision and objectives. Whilst this vision described may have some merits to seek to change the vision in the NSF as proposed to one seeking to propose development of a locally distinctive nature with much higher levels of self containment and more self contained economies based on quality of life rather than improving external infrastructure linkages and connectivity to the wider south east is not one that is shared by all partners, so to some extent the current vision and objectives reflect what partners are prepared to agree to, rather than a single compelling vision which may not be agreed by all partner bodies. Therefore it is not favoured to make wholesale changes to the emerging vision and objectives to reflect the particular view put forward and the "smart growth" model. It is recognised that using the term "communities" within the objectives may be preferable to "living environments"</p>	Change "living environments" to "communities in" objective under housing needs
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	<p>(continued from above)Spatial Vision</p> <p>While generally sound, the spatial vision is too generic and doesn't fully reflect the essential qualities of Norfolk. The proposition could attach to almost any county in the UK - we need more recognition of the essential qualities of the asset base, character and culture of Norfolk., and a vision tightly built out of these foundations.</p> <p>SUGGESTION - work should be done with Building Growth, Chamber of Commerce and the CPRE building on the formers outreach into the building industry in partnership with the Chamber of Commerce's Planning Group reaching a volume of businesses, and the latter's community outreach capacity (and their Norfolk 2020 document) to undertake wide stakeholder discussion of the key qualities of Norfolk and an aspiration for good growth for the next 20 years. The Place Land & Markets Group at Building Growth would be pleased to work with the Norfolk Strategic Framework to coordinate and produce this.</p> <p>The specific points set out towards achieving the positive growth of Norfolk are useful. To be made more powerful they need to be placed within the context of a stronger spatial vision and overarching growth narrative.</p> <p>QUESTION - how will the points set out be translated into robust planning policy which will resist development that produces generic single use housing propositions in the face of the present NPPF and 5 year land supply issues?</p> <p>The BG PL&M Group would be pleased to work with the NSF team to consider how these aims can be robustly embedded into the planning and development delivery process to ensure delivery and help fight litigation and challenge.</p> <p>ADDITIONAL INFO SUBMITTED - Place Competitiveness & The Regional Growth Challenge</p>	<p>see above. Timetable for NSF adoption insufficient to allow significant joint working with the building growth group at this stage, however, the offer is welcomed and how to further improve joint working between the local authorities and the LEP sector group could be taken forward in the new year.</p>	No change to NSF

ANON-3C85-CA3K-5	Natural England	<p>2.1 Introduction p6 Second paragraph (under Fig 1), second sentence should be amended to read as follows: "It contains many natural environments which are highly valued for their landscape and for their biodiversity and/or geodiversity interests." Currently there is no reference anywhere in the NSF to Norfolk's rich geological sites and features, many of which are of national importance. Similarly, there is no reference to soils.</p> <p>2.3 Proposed Shared Objectives p9 The wording of the objectives for Norfolk's environment should be amended to read as follows: "To improve and conserve Norfolk's environment by: - ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, biodiversity, geodiversity, soils, protected landscapes, the Broads, the Brecks and the coast; - protecting the landscape setting of our existing settlements where possible and preventing - the unplanned coalescence of settlements; - maximising the use of previously developed land within our urban areas to minimise the need to develop previously undeveloped land; - minimising, where possible, the development of best and most versatile agricultural land; - where previously undeveloped land is developed, the environmental benefits resulting from its development will be maximised; - protecting, maintaining and enhancing biodiversity through the conservation of existing habitats and species, and by creating new wildlife habitats through development; - providing a coherent connected network of accessible multi-functional green infrastructure; and - reducing the demand for and use of water and other natural resources.</p> <p>The amendments will help to ensure that the objectives of the NSF comply with the National Planning Policy Framework and that the planning system in Norfolk contributes in a sustainable manner to the creation, protection and enhancement of its natural resources.</p>	Changes accepted.	Environmental objective updated
ANON-3C85-CAC4-X	Stalham Town Council	<p>I would like to see a bus service that goes direct from Stalham to Norwich Railway Station, as Stalham has no station of its own. There is a requirement in Stalham for more businesses to move here to encourage younger people to live in the area and stay here. Since the banks closed the footfall in the town has also fallen, so this could be improved by building societies being encouraged to locate in the town and other small businesses. Stalham residents and the outside areas rely heavily on the town, so we would not wish to see it lose any more businesses. I believe Norfolk would benefit from a better road connection between Norfolk and the North West, e.g. Norfolk to Liverpool, Manchester and Birmingham, etc. At present, the journey time to the North West is far too long. I would like to see the NCC give thought about how to provide and support youth clubs and other events for teenagers in rural areas. At present there is no bus service from many rural areas to Norwich in the evenings, so this encourages some teenagers to find less desirable forms of entertainment where they live, such as vandalism, etc. I get the feeling in Norfolk that not enough is done to encourage events that might appeal to them, and providing the transportation for reaching them.</p>	Points noted but unfortunately it is hard to identify how these matters may be addressed through the NSF.	No change to NSF
BHLF-3C85-CAC1-U	Home Builders Federation	<p>Plan periods and reviews Whilst we would agree that it is important for there to be consistency with regard to the plan period it is important that they not only have consistent end dates but also consistent starting dates. Consistent plan periods will improve transparency and ensure that the house building industry has a clear picture of delivery across the County and whether housing needs are being met. However, we also consider it important for the framework to set out a shared review point for each local plan. The Government have been clear that plans should be reviewed every five years and that such reviews would offer the opportunity to consider greater alignment of plans. Setting this out in the framework would provide a clear indication that the districts and boroughs in Norfolk were working toward greater co-operation and alignment of their plans in future.</p>	Noted but not practical, local planning authorities are likely to base emerging local plans on most up to date information available rather than a standard start date.	No change to NSF
ANON-3C85-CACS-W	Norfolk Wildlife Trust	<p>Pleased to see importance of biodiversity is recognised in second paragraph Support all bullet points under heading of "improve and conserve Norfolk's Environment"</p>	Support noted	No change to NSF
BHLF-3C85-CAC7-1	Amstel Group Corp	<p>As the Framework notes, Norfolk is a "largely rural county". The Framework asserts that "a good relationship between homes and jobs will minimise the need to travel and residents will have choice about how they meet their demand for local travel." We welcome the Framework's intention to address housing needs by contributing towards sustainable patterns of development including improving the relationship between homes, jobs and other key day to day services. The Framework recognises that Norfolk is a largely rural county and therefore the Framework should also realise that this means that there will always be an inherent need to travel in order to access certain goods and services. Norfolk's rural villages have better access to goods and services now than ever before, as people procure more and more goods and services online. The Framework and the emerging Local Plans of Norfolk's Local Planning Authorities need to reflect this cultural shift in shopping habits. Thus the need to be physically close to goods and service providers is less important than it used to be and should no longer be the over-riding component of sustainability. New factors such as broadband connectivity and access to higher order services should now form part of the debate. Likewise, the Framework should acknowledge changes in contemporary working patterns. Travel to work patterns are more diffuse nowadays and there is an ever-rising incidence of home/remote working. As such, there is less emphasis on travelling for work. The over-arching spatial document for Norfolk should explicitly acknowledge this. All of this leads to a need to take a more nuanced and sophisticated approach to preparing a spatial strategy for the area and sustainability generally. Proposed settlement hierarchies in emerging Local Plans need to reflect these changing habits.</p>	Views noted at local plans we need to strike the appropriate balance between concentrating growth in and around larger settlements and dispersing it across a wider range of settlements, this is considered to be a matter primarily for local plans but the vision and objectives expressed in the NSF are considered to be consistent with government guidance in this matter.	No change to NSF
BHLF-3C85-CACW-1	Barford & Wrampingham Parish Council	<p>Barford and Wrampingham Parish Council feel that the document lacks strategic clarity. For example it has plenty of high level objectives but sort on measurable outcomes. There is also a lack of information and definitions which make it impossible to make meaningful comment on the planning policies regarding housing allocation calculations for example there is little comment on whether we will see the introduction of further strategic gaps which can be an important issue for service villages as towns creep further out nor is there any statement as to whether the current settlement hierarchy will remain in place. It also seems incongruous that Breckland is not part of this Greater Norwich Local Plan as people live in towns such as Attleborough and Thetford and have similar lengths of journeys to work in Norwich as people in e.g. Diss which falls within SNDC.</p>	Views noted. NSF reflects the current position that Breckland District is preparing a standalone local plan and not participating in the production of the GNLP.	No change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	<p>Section 1 - Timescales and Coverage (Agreement 1) Persimmon Homes supports Agreement 1 for the LPA to produce documents which provide for the development needs of their areas until at least 2036. This is essential to ensure that our investment and planning strategies are informed by up-to-date and forward-looking plans, that provide certainty for a number of years. Persimmon Homes would urge all Local Authorities across Norfolk to push forward quickly with their Plan reviews to provide the certainty the house building industry needs</p> <p>Section 2 - Vision and Objectives (Agreements 2 and 3) Persimmon Homes supports the Proposed Spatial Vision (Agreement 2) and Proposed Spatial Objectives (Agreement 3). It is in everyone's interest for Norfolk to have a strong and vibrant economy; supported by key infrastructure which includes housing; improved connectivity and appropriate relationships between the location of new homes and jobs. Persimmon Homes also support co-operation across District Council areas. Housing markets do not follow administrative boundaries, and Districts need to collectively plan for housing to meet the housing needs not just for their District but also neighbouring Districts and in some cases adjacent Counties. Persimmon Homes notes the objective to match increases in job growth with housing growth but it should not be forgotten that there is still some catching up to do in terms of housing delivery. Persimmon Homes are doing what they can to deliver homes where they are needed, but there are opportunities for the planning system to be more efficient in providing the necessary consents and agreements to allow developers to get on site and build, such as improvements to Local Plan and planning application processing; reserved matters applications, 8106 completions, Discharge of Condition applications etc</p>	Noted	No change to NSF

BHLF-3C85-CACQ-U	Historic England	<p>We welcome the acknowledgment in section 2.1 of the considerable stock of heritage assets which make up the area's market towns and, the recognition of the role these assets play in creating attractive high quality places for residents to live which can also improve well-being. It would be pertinent to also reference the strong rural heritage of the area as well in terms of both the built and natural environment as well as archaeology. A strategic level reference to the importance of non-designated or undiscovered heritage assets would also be welcomed.</p> <p>Proposed Spatial Vision The vision seeks enhancements to both the natural and built environment; the distinction between the two and specific reference to the built environment is welcomed but we request that the "historic environment" is listed as well. We would recommend that the Vision make specific reference to designated and non-designated heritage assets or the historic environment.</p> <p>Proposed Shared Objectives We are pleased to see that the protection and enhancement of Norfolk's built and historic environment and landscapes constitute a shared objective (page 9 of the draft). We request that this remains a shared objective.</p>	Support noted, current wording refers the historic environment which is a broad term encompassing archaeology and non designated environmental assets. Including further specificity on this matter would lengthen objectives and merely duplicate NPPF. However agree to change spatial vision to include 'natural, built and historic environment'.	Change spatial vision to include 'natural, built and historic environment'.
BHLF-3C85-CAC5-Y	Norfolk County Council	<p>We welcome the environment thread throughout the document as the environment is pivotal in ensuring resilience to climate change, quality of life, health, economic viability etc.</p> <p>Under Agreement 3 (To address housing needs in Norfolk) – suggest another bullet along the lines: "Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (i.e. through S106 agreements and/or Community Infrastructure Levy)" There should be a cross-reference to this point in Section 7 (Infrastructure and Environment) on page 40.</p>	Support noted and NSF updated	Include bullet: "Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (i.e. through S106 agreements and/or Community Infrastructure Levy)"
BHLF-3C85-CAE4-Z	North Norfolk District Council	Agreement 1-3: That the Council supports better alignment of Local Plan production. That no objection is raised to the shared vision and overarching objectives although further consideration could be given to making these more specific to Norfolk. In this regard some reference to important strategic considerations such as the process of coastal change, the AONB and the importance of market towns in rural areas may be useful.	This will be considered in future versions of the NSF	No change to NSF

UNDERSTANDING THE COUNTY COMMENTS

Response ID	Organisation	Answer	Officer Response	Action
ANON-3C85-CA8T-K	Hockering Parish Council	All new developments need to be considered with extreme sensitivity to the existing area, its residents and rural nature. New roads are not necessarily the answer. An improved public transport system should be encouraged.	Noted	No change to NSF
ANON-3C85-CAFT-1	Resident	3.3 seems to neglect the cultural / attitude changes needed to remove the silo working of districts (both as political institutions and as residents). Agreements 5 and 6 seem to indicate that this silo planning will continue.	All authorities are working closer together on strategic issues and will continue to do so in the future	No change to NSF
ANON-3C85-CAXS-J	Resident	Cromer and Sheringham, plus the closer to Norwich Aylsham, are shown as travel to work areas. Substantial housing developments are taking place in Aylsham and yet there is still only one single carriageway road in to Norwich from Cromer via Aylsham and very limited public transport from Aylsham i.e. no train, so inevitably a substantially increased volume of road traffic to Norwich. There is no indication that Highways have any proposals to mitigate this.	Noted	No change to NSF
ANON-3C85-CAXN-D	East Roston Parish Council	Parish councillors are elected representatives of the Parish and yet we have very little input to the Broads Authority and never see the authority members	Noted	No change to NSF
ANON-3C85-CAXW-P	NUA	• NUA note the aim to reduce car use in the county in favour of public transport. We hope that in the delivery of this aim will be reflected in provision of adequate parking for those travelling from parts of the county which are unlikely ever to be served well by public transport options. We would also be keen to see this aim reflected in improved signage for motorists, cyclists and pedestrians	Noted	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited understands the reasons for the various Agreements and supports the certainty provided by Agreement 6 (ie Breckland to prepare its own local plan). Attleborough Land Ltd also accept that housing market areas are not restricted to administrative boundaries. Attleborough Land Ltd have submitted a planning application that is consistent and in conformity with both the Existing Core Strategy and emerging Local Plan. The application will provide for a significant proportion of the housing market area's identified housing need. The information in the existing and emerging local plan and their supporting documentation has helped to inform the planning application's evolution and also the masterplan and parameter plans.	Support Noted	No change to NSF
ANON-3C85-CAJG-R	Resident	The document clearly does not identify the county in terms of not recognising the needs of full time residents in North Norfolk, including Fakenham, who have very limited access to good roads, broadband, swimming pool and rail services. The area just had to suffer increased tourism and second home ownership. The document fails to recognise the likely impact on the current NDR development and the lack of any decent roads north of Swaffham, Norwich and Dereham.	Noted	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 3.2 The housing market areas are really interesting. The use of the word 'snapped' is unclear. Para 3.3 - The differences between figs 3 and 4 are fascinating with West Norfolk extending much further eastwards in Fig 4. with Thetford and Mildenhall as well as Cromer and Sheringham becoming distinct areas. The poor east west connectivity in the county is a major problem. The Northern Distributor Road will be of help particularly if extended to connect with the A47 to produce an orbital road around the city.	Snapped refers to following district boundaries as a near fit. Other points noted.	No change to NSF
ANON-3C85-CA62-F	Resident	Too much emphasis on road building.	Concern noted	No change to NSF
ANON-3C85-CAJF-Q	Resident	The analysis is broadly supportable, but the lack of presumptive travel to work in Cambridge (although Mildenhall is included) is highly doubtful and questionable as there is considerable travel to work there from King's Lynn and Downham Market. Indeed, from the latter there is also considerable travel to work in London as well. This omission means that the analysis is flawed in respect of West Norfolk, so the statements that "self containment in housing and economic matters [will remain] as present" and "the functional geography of the County will remain broadly as it is..." is plainly incorrect. It is notable that rail developments to be implemented by Abelio during its new franchise period are included, implied to be laudable, but the downgrading of train service delivery by Great Northern between King's Lynn, Cambridge and London from 2018 is deemed not to warrant a mention. This reinforces the flawed analysis referred to above; if travel to work in Cambridge and London from West Norfolk is recognised then the planned worsening of the train link from West Norfolk, and the possible transfer to car travel this may bring, would be flagged as a cause for grave concern.	Figure 4 reflects ONS statistics for Travel to work Areas. Points regarding counties economic geography are not agreed with, numbers commuting out of the county for work are considered likely to remain low as a proportion of total resident workforce.	No change to NSF

BHLF-3C85-CA3P-A	Heaton Planning Limited on behalf of Brett Aggregates	<p>Agreement 3 -Proposed shared objectives</p> <p>Agreement 3 seeks to ensure that by 2036, through cooperation between Local Authorities and preparation of Development Plans, Norfolk will seek to maximise the delivery of a number of objectives.</p> <p>The document provides the general strategic principles/objectives for all Local Plans. In addition the document is endorsed by the County Council, which would indicate that the emerging Minerals Local Plan will also be based upon the same objectives. In this regard, it is considered that shared objectives for Norfolk should include:</p> <ul style="list-style-type: none"> • The safeguarding of known mineral resource from needless sterilisation • The sustainable use of natural resources • Planning for a steady and adequate supply of aggregates to meet the projected development needs of the County <p>Section 3 – Understanding the County Paragraph 3.1 – Administrative Boundaries</p> <p>Section 3.1 identifies that, ‘as County wide plans are already in place for minerals and waste this framework does not address mineral and waste matters further although further iterations of these documents will need to reflect our shared ambitions for growth’. We consider that this matter cannot be disjointed from Local Planning Policy as the Minerals and Waste Development Plan combined with the Local Plan become the Statutory Development Plan for the area.</p> <p>The County Council has committed to a ‘Minerals Plan Review’ to consolidate all current adopted Development Plan Documents as well as extending the Plan timescale to 2036. In light of this commitment to review the Minerals Plan and the coinciding timeframe for Plan periods, it is considered that it would be prudent to include reference to minerals and waste needs for the County within the Strategic Framework. We have suggested inclusion of reference to minerals provision within the spatial vision and shared objectives as above.</p>	The Norfolk Strategic Framework is a non-statutory document which considers planning issues at a County scale that are currently planned for on a smaller scale (district, borough or Greater Norwich). As minerals and waste are already planned for at a County scale in a statutory plan, it is not considered necessary for this work to be replicated in the NSF.	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	<p>1 This links to the answer in question 5 that insufficient understanding or regard towards West Norfolk's differences from the rest of the county is evident. It works within a different economic sphere of influence (largely linked to Cambridge, not Norwich), and is a sub-regional centre in its own right. Neither of these, nor the importance of them, are given due recognition in the NSF.</p> <p>2 This failure is most evident in the lack of recognition of the considerable infrastructure investments required in this area, to broadband provision, to rail and road networks. This is discussed further in answer to question 15.</p> <p>3 We note the statements that "self-containment in housing and economic matters [will remain] as present" and "the functional geography of the County will remain broadly as it is" and whilst these may be broadly correct for much of the county, they are manifestly not so in the West. This incorrect assumption leads to interventions and investment proposals that are inadequate to ensure a vibrant economic future in the West and needs to be corrected.</p>	It is felt that the NSF does recognise the strategic importance of the links between areas in the west of the county and parts of Cambridgeshire. The Infrastructure section highlights a number of key road and rail improvements in the west of the region. Regarding point 3, from our understanding of evidence it is likely that for the foreseeable future employment patterns around King's Lynn will remain sufficiently self-contained such that the ONS will continue to identify the area as a separate travel to work area and not part of the wider Cambridge TTWA.	No change to NSF
ANON-3C85-CA3V-G	Resident	Agreement 5 is absolutely right. No time to re-invent the wheel.	Support Noted	No change to NSF
ANON-3C85-CA6C-Z	EA	<p>as per our previous comment we would like to see water quality included in the section related to the environment. Future development should not impact on water quality and the water framework directive and water cycle studies should be used to improve water quality.</p> <p>We welcome the objective to incorporate environmental benefits into development, which will contribute to green infrastructure. We also support the vision to reduce the demand and use of water, this should relate to both construction and habitation of new development</p>	Point noted, water quality aspects are dealt with under the infrastructure section and a reference to water quality has been added to the objectives.	No change to NSF
ANON-3C85-CA61-E	Define Planning & Design Ltd	<p>Whilst we do not object to the principle of HMA boundaries being ‘snapped’ to Authority boundaries for the sake of ensuring common boundaries between the three HMAs, the potential impact on housing targets as a result of functional economic market areas that clearly cross between the HMAs must be carefully considered in conjunction with the SHMA preparation process.</p> <p>In this regard, the travel to work areas identified in Figure 4 illustrate the considerable overlapping of economic functions across the HMA boundaries. Notably, Fakenham and Kings Lynn fall within the same TTWA, but within separate HMAs, and it places Fakenham and Wells within separate TTWAs, which does not necessarily reflect the proposed Growth Corridor between these two settlements. Given the overarching emphasis within this framework on the relationship between housing and employment growth and the need for this to be directly linked, it is critical that the economic function between settlements is acknowledged and fully taken into account.</p> <p>In terms of the challenges on infrastructure, it is noted that the proposed enhancements are not considered likely to result in a change in the functional geography of the County. However, localised improvements must be considered a priority through the Local Plan process if the growth potential of settlements beyond the major urban areas is to be maximised, in order to meet identified needs where they arise as part of a sustainable growth strategy. As noted in further detail in response to Section 6, the critical role of other bodies in the planning, funding and delivery of infrastructure should also be explicitly referred to in order to encourage their proactive involvement.</p>	Point noted but are best considered in the preparation of local plans	No change to NSF

<p>BHLF-3C85-CA3W-H</p>	<p>Hoveton Parish Council</p>	<p>Section 3 – Understanding The County</p> <p>Hoveton Parish Council was pleased to see the following had been noted as part of the draft Norfolk Strategic Framework:</p> <p>“Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development.”</p> <p>As noted above, the parish of Hoveton is administered by two Local Planning Authorities. Meanwhile, an additional challenge is posed by the fact that the parish of Wroxham – which shares strong functional relations with Hoveton, along with a shared infrastructure – is administered by a neighbouring Planning Authority (in this case, Broadland District Council). The neighbouring parishes are also represented by two different Members of Parliament from two different political parties, and policing is overseen by two separate Safer Neighbourhood Teams. In an attempt to speak with "one voice" and to encourage Local Authorities to work more closely together, Hoveton Parish Council and Wroxham Parish Council recently formed the Wroxham and Hoveton Joint Action Group, which aims to tackle issues that affect both parishes.</p> <p>Hoveton Parish Council is pleased to see that North Norfolk District Council will continue to produce a separate Local Plan for the area and that, in view of the distinct issues facing the Broads Authority area, spatial planning matters will be addressed by way of a standalone Broads Local Plan.</p>	<p>Noted</p>	<p>No change to NSF</p>
<p>ANON-3C85-CA3Y-K</p>	<p>Lanpro Services Ltd</p>	<p>In addition to the information set out previously, we are of the view that further joint working between the relevant authorities is essential for the viable future of Norfolk.</p> <p>The document advocates groups of authorities to conjoin Local Plans. There is of course the duty to co-operate, but in our view that the excellent initiative of creating this Framework, led by the County Council should be further developed. This should continue to look at the most sustainable strategic development strategy for the entire County regardless of politics and Local Planning Authority boundaries.</p> <p>This we believe is justified by the lower density of development and occupation compared to most other parts of the country, allied to the significant issues of shortfalls in infrastructure, particularly in public transport and the need to take a strategic approach through carefully planned development, which will help support the improvements needed.</p> <p>The focus on existing key employment sectors and economic centres, particularly Norwich, but also towns such as Thetford, Kings Lynn and Great Yarmouth is of great importance while the proposals for improving the travel to work in such locales areas is particularly of interest. This however should not be to the detriment of existing rural areas where there are existing and nascent communities ready to become involved in this strategic process.</p> <p>We are also of the view that as part of this strategy, an innovative approach needs to be taken with respect to transport planning, building on the recommendations included in the Norfolk County Transport Plan. This recognises the economic and social values of Bittern and Wherry Lines, commits to promote these lines, and to work with other Community Rail Partnerships, an example of which is the North Norfolk Orbital Railway project. This Plan also highlights the importance of the North Norfolk, Mid Norfolk and Bure Valley Railways and indicates that the County Council will support improvements sought by the independent rail groups responsible for them. However, the Connecting Norfolk document indicates that despite highlighting continued official support, it does emphasise that funding is limited and none of the major funded capital improvements will be linked to this type of opportunity. Section 106 and CIL monies, despite being given a fair wind in the Plan, may be not provide sufficient resources to lead to any of the needed infrastructure improvements. (Continued below)</p>	<p>Points noted, it should be noted that preparation of the NSF has been lead by districts working on a county wide basis rather than by the county council. Whilst there are plans to further develop joint working there are no plans for a county wide strategic plan at present. One of the aims of producing the Norfolk Strategic Framework is to agree shared objectives and priorities to improve outcomes and help shape future plans. The introductory text to the document notes that “This document is intended to be strategic in nature. It provides only an overview of background information and shared research.” Section 7 goes on to state “Further work on infrastructure priorities will continue before the finalisation of the NSF but it should be noted that these short term priorities which are listed in this document will only represent a fraction of the overall infrastructure investment needed to deliver the growth ambitions of the NSF”</p> <p>Given this, I am afraid that, whilst the local authorities involved in producing the document might support the aims of the Melton Constable Trust and those of the community rail partnerships, the stage of the project (for orbital rail), the likelihood of it being achievable in the short to medium term, and its role in serving the transport needs of the county (when weighed against the projects within the framework such as Norwich to Cambridge rail) all mean that it is considered premature to consider it of sufficient strategic standing to merit detailing its inclusion in the framework. We are aware that the Trust has been speaking to the various local authorities including Norfolk County Council and are sure that continuation of this dialogue will help to move forward with the project.</p>	<p>No change to NSF</p>
<p>ANON-3C85-CA3Y-K</p>	<p>Lanpro Services Ltd</p>	<p>(continued from above) These live and dormant rail lines present a range of opportunities, from continuing to develop an interesting tourist experience to linking towns, improving connectivity and the sustainability of anticipated transport movements. But these rail lines also provide strategic planning opportunities, and help to meet growth requirements in a planned and sustainable manner, by creating new centres of planned development, which may include consideration of one or more planned garden communities. Such settlements would make a significant contribution to the infrastructure investment needed, link to sustainable travel opportunities, particularly through rail, but also ensure a managed approach to growth in the medium and longer terms.</p> <p>We therefore recommend that recognition of the potential of a County-wide joint approach and innovative transport planning including a focus on disused or underused former rail lines, should be made in the Framework.</p> <p>These live and dormant rail lines present a range of opportunities, from continuing to develop an interesting tourist experience to linking towns, improving connectivity and the sustainability of anticipated transport movements. But these rail lines also provide strategic planning opportunities, and help to meet growth requirements in a planned and sustainable manner, by creating new centres of planned development, which may include consideration of one or more planned garden communities. Such settlements would make a significant contribution to the infrastructure investment needed, link to sustainable travel opportunities, particularly through rail, but also ensure a managed approach to growth in the medium and longer terms.</p>	<p>See above</p>	<p>No change to NSF</p>

ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	<p>Housing Market Assessment</p> <p>There is a gaping omission in the current document to refer to the impacts of</p> <ol style="list-style-type: none"> 1) the Cambridge growth phenomenon on the current and potential property market and servicing requirements to be considered in the plan period; 2) to the albeit limited, however profound local impacts of second home ownership and the increasing deployment of domestic property for rental income in the Coastal areas 3) the relationship of the county to the London property market - while we see relatively limited daily commuting, weekly commuting to London is a common phenomenon, equally we are seeing substantial reverse migration from London due to property price and poor quality of life. <p>These key housing market dynamics need to be acknowledged and understood in planning for future growth.</p> <p>Agreed that the functional geography of the county will not be impacted by the Norwich in 90 investment. We propose that a critical focus of future investment should be the speed and frequency of Norwich-Cambridge line which could substantially alter the functional geography. Equally, consideration should be given to the reinstatement of local rail lines serving movement into and out of the City of Norwich and leisure movement to the coastal area. Both such infrastructure moves would substantially alter the locational characteristics of the County. They would also underpin a more equitable access to jobs, education and services for the very young and very old, and would underpin a sustainable land release pattern and sustainable tourism as it grows into the future.</p> <p>The definition of submarkets has missed out a critical step in terms of assessing alternative growth models and modelling the underlying infrastructure to identify cost benefit and capacity.</p> <p>The BG PL&M group continue to advocate a new approach to regional planning based on the intelligent spatial analysis drawing upon the latest analytical technology and deep data sources which are now available to us. This position is covered in the previously attached document entitled 'Place Competitiveness' and we would like to explore the potential for working with the NDF to develop such a model potentially located at UEA for all relevant authorities and the private sector to draw upon.</p>	Noted, many matters referred to have been considered in the production of SHMAs that inform this framework.	No change to NSF
ANON-3C85-CA31-B	Wroxham Parish Council	<p>Wroxham Parish Council supports the view contained in the draft document:</p> <p>"Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development."</p> <p>As noted above, the parish of Wroxham is administered by two Local Planning Authorities. Meanwhile, an additional challenge is posed by the fact that the parish of Hoveton – which shares strong functional relations with Wroxham, along with a shared infrastructure – is administered by a neighbouring Planning Authority (in this case, North Norfolk District Council). The neighbouring parishes are also represented by two different Members of Parliament from two different political parties, and policing is overseen by two separate Safer Neighbourhood Teams. In an attempt to speak with "one voice" and to encourage Local Authorities to work more closely together, Wroxham Parish Council and Hoveton Parish Council recently formed the Wroxham and Hoveton Joint Action Group, which aims to tackle issues that affect both parishes.</p>	Noted	No change to NSF
ANON-3C85-CA35-F	Tunstead & Sco Ruston Parish Council	<p>My view is that the Broads Authority should not be given any powers regarding planning. Their duties as public servants is to promote boating and the holiday industry on the Broads, maintain clear navigation by dredging channels and clearing weeds from these channels, and to protect the environment.</p>	Not a matter to be addressed by the NSF	No change to NSF
BHLF-3C85-CAC8-2	Suffolk County Council	<p>3.2 Housing Markets</p> <p>The Suffolk local authorities (Suffolk LAs) agree with the pragmatic approach to defining housing market areas used in the Framework and seeking to fit these to administrative boundaries. Specifically Waveney District Council has written in support of the coterminosity of the housing market with district boundaries. In addition the approach of identifying housing market areas at larger than individual districts is consistent with that used in Suffolk. However it is recognised that this cannot be a firm line and that influences do extend across such boundaries.</p>	Support Noted	No change to NSF
BHLF-3C85-CACG-H	Persimmon homes	<p>Section 3 - Understanding the County (Agreements 4-7)</p> <p>Persimmon Homes supports the ambition for the SHMAs to be up to date (Agreement 4)~ However, we do not necessarily agree that the Housing Market Areas for Great Yarmouth and West Norfolk do not overlap with the Central Norfolk HMA, at least not as neatly as is suggested along administrative boundaries. If it is not possible to produce a single SHMAs for Norfolk, then we would urge that they are prepared/updated in parallel and LPA's share relevant information.</p> <p>Persimmon Homes note the aspiration for Great Yarmouth and King's Lynn and West Norfolk, Breckland and North Norfolk to produce their own separate plans (Agreements 5-6), but would urge that rolling forward these plans to 2036 is progressed without delay. Plans need to be adopted quickly to provide the certainty that the development industry needs. Persimmon Homes support the Agreement for Broadland, South Norfolk and Norwich City to continue to prepare a Joint Local Plan, but are concerned in the slippage of the timetable. Persimmon Homes trust that the authorities will be able to resolve some of the apparent differences in approach to the Joint Local Plan's emerging Spatial Strategy.</p> <p>Persimmon Homes have no comment on the Broads Authority Local Plan (Agreement 7).</p>	Noted	No change to NSF

BHLF-3C85-CACZ-4	Broadland District Council	The comment re Highways agency refers to NSF page 15, 2nd paragraph, where it states: "are scheduled to be completed by 2020". They will not be done by 2020 (though I don't know what the timetable is).	Document updated to a number of improvement schemes for the A47 as part of the government's trunk road programme from 2015 to 2020, although it is likely that delivery of these schemes will not start until 2020	Update section 3.4 to a number of improvement schemes for the A47 as part of the government's trunk road programme from 2015 to 2020, although it is likely that delivery of these schemes will not start until 2020
BHLF-3C85-CACK-N	Hoveton Parish Council	<p>Hoveton Parish Council was pleased to see the following had been noted as part of the draft Norfolk Strategic Framework:</p> <p>"Social, economic and environment considerations are neither determined by, nor constrained to, the administrative boundaries of the various planning authorities. Some issues affect single authorities, others are universal to the whole of the County, and across the area there are strong functional relations between places administered by neighbouring authorities. Indeed some settlements straddle the boundaries of planning authorities (Wroxham and Hoveton), as does the infrastructure which is necessary to support development."</p> <p>As noted above, the parish of Hoveton is administered by two Local Planning Authorities. Meanwhile, an additional challenge is posed by the fact that the parish of Wroxham – which shares strong functional relations with Hoveton, along with a shared infrastructure – is administered by a neighbouring Planning Authority (in this case, Broadland District Council). The neighbouring parishes are also represented by two different Members of Parliament from two different political parties, and policing is overseen by two separate Safer Neighbourhood Teams. In an attempt to speak with "one voice" and to encourage Local Authorities to work more closely together, Hoveton Parish Council and Wroxham Parish Council recently formed the Wroxham and Hoveton Joint Action Group, which aims to tackle issues that affect both parishes.</p> <p>Hoveton Parish Council is pleased to see that North Norfolk District Council will continue to produce a separate Local Plan for the area and that, in view of the distinct issues facing the Broads Authority area, spatial planning matters will be addressed by way of a standalone Broads Local Plan.</p>	Support Noted	No change to NSF
BHLF-3C85-CAE4-Z	North Norfolk District Council	Agreement 4: That North Norfolk welcomes the on-going commitment to the joint preparation of such studies. Agreement 5-7: That North Norfolk supports these Agreements	Support Noted	No change to NSF

PROJECTIONS OF GROWTH COMMENTS

Response ID	Organisation	Answer	Officer comment	Action
ANON-3C85-CA87-P	Town Councillor/resident	Fails to take account of the effect of Brexit and a such completely unreliable	It is not possible at this stage to predicted the impacts of Brexit on the population numbers and the labour market. Once this picture becomes clearer the NSF can be updated accordingly.	No change to NSF
ANON-3C85-CA8T-K	Hockering Parish Council	It would be helpful to have more detail regarding how these figures have been arrived at. As they stand, they appear purely abitrary,	The comment doesn't specify which figures but the data within this section has been obtain from the Office of National Statistics. Links are provided within the NSF to where the primary data can be obtained and more information is provided on the ONS website.	No change to NSF
ANON-3C85-CAFT-1	Resident	You consider employment, but not the quality of employment. It's disappointing not to see an income deprivation calculation alongside the number of people simply in work.	Section 4 deals with projections of the future. We are not aware of any available future projection of income deprivation	No change to NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	When will the infrastructure be provided	Delivery dates are indicated where known.	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited notes Norfolk's population growth projections. The Sustainable Urban Extension at Attleborough will provide new homes to help accommodate this growth. More detailed information on house types and tenures will follow at the reserved matters stage, which will respond to specific housing needs where possible and viable. This will be achieved through a comprehensive mix of housing types, sizes and tenures. These will be implemented at each phase of the SUE. The Section 106 agreement that will accompany the planning consent will set out the means by which the development's impact will be mitigated including provisions for the infrastructure needed to support population and household growth related to the development.	Noted	No change to NSF
BHLF-3C85-CAJD-N	Resident	Page 19 – The last sentence of 4.1 states that “significant issues” are not considered further in the framework. Why is this? Firstly, surely they should be if they are significant! And secondly transport should be added to social care and education. Transport is very important given that North Norfolk has the third highest proportion of over 65s in the country, a fact not mentioned in the framework; the growing proportion of that age group is mentioned but not the proportion in relation to the country’s average.	Points noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future.	No change to NSF
ANON-3C85-CAJG-R	Resident	The increasing number of over 65s need to be recognised and planned for in North Norfolk, including good roads, rail and public services to support their needs. Consideration must be given to those with increasingly limited retirement income and the isolation in villages which have mainly second homes during the winter.	Points noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future.	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 4.1 - the marked increases in the elderly in all areas except Norwich is associated with decreases in the population of working age. This shift in the age structure may be an important factor in the expected 75% of growth to occur in the Greater Norwich area. The elderly population however will require help with household repairs, cleaning gardening even if remaining in their own homes. The people providing such services will need accommodation preferably in the vicinity that they will be working in.	Points noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future.	No change to NSF
ANON-3C85-CA62-F	Resident	Population growth estimates are unsustainable, particularly in the Norwich area. Such an increase in population is completely at odds with a decent quality of life, especially as large and badly designed housing estates are being built on the outskirts of Norwich, depriving city residents of access to countryside (especially for the third of residents with no access to a car).	View noted	No change to NSF
ANON-3C85-CAJF-Q	Resident	1 The population and household trends show significant impacts not only for social policy (as recognised in the narrative) but also for local transport policies. Based on policy neutral assumptions, over 66s have access free to local bus services and this is shown to produce a net benefit to society of about 3.7:1 on government expenditure. 2 The dilemma is that local bus services are provided commercially in a free market, and without interventions by local authorities - which take considerable periods of time to arrange - then the current cycle of decline of bus routes will leave a growingly elderly population isolated with the social impacts that that leads to. 3 Part of this policy framework should therefore consider what interventions should be made under the various transport legislation in the 1985, 2000, 2008 or 2017 Acts to ensure that the increasingly elderly population is well catered for in this respect.	Points noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future.	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	1 The projections indicate that the over 65 aged population will increase whilst those in the lower ranges will remain largely unchanged. However, in West Norfolk the projections are more skewed with a larger retired population being provided for by a shrinking work age population. 2 This has very significant implications for the delivery of services for the population as a whole and for the elderly in particular which the NSF does not address. Whilst this is a potentially pan-Norfolk issue it is most evident in projections for the West. The NSF must address how this will be dealt with and adequate provision made. 3 The impact of a shortage of appropriate aged labour has implications in social care, agriculture and also in retail where, in King's Lynn town centre in particular, greater emphasis is being put on the heritage offer, which requires staff for the hospitality sector, which is traditionally younger adults. How this will be addressed (including housing, training etc) must be addressed in the NSF with a particular West Norfolk aspect to it. 4 A disproportionately ageing West Norfolk population will increasingly require appropriate transport solutions if it is not to become socially isolated. Not only does social isolation have impacts in terms of health and wellbeing but also reductions in local transportation provision will also impact the town centre economy with broader economic consequences for the entire population. The NSF needs to address how it will ensure an adequate local transportation network is maintained and what interventions it will make in the free market, in accordance with Acts of 1985, 2000, 2008 and now 2017 all designed to enable the free market for local bus services to be moderated in order to better meet the needs of the local population.	Noted, resource was not available to allow a more detailed explanation of the issue around housing for the elderly in the NSF. It is hoped that these issues will be able to be addressed in the future. Disagree that it is an issue which is more significant in west Norfolk than other parts of Norfolk eg North Norfolk.	No change to NSF

BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	<p>Section 4 Growth Projections</p> <p>Section 4.1: In Table 2 the projected 2036 percentage change in population growth by age quantiles appears to be incorrect for Kings Lynn and West Norfolk (the figures sum to 156%).</p> <p>Table 3: The breakdown of both the absolute and % figures also seem to be incorrect for Kings Lynn and West Norfolk (showing difference between 'All People' by district between 2014 and 2036).</p> <p>Table 4.2: The growth projections mask important variations – particularly on the Norfolk Coast (and possibly elsewhere unknown to us) where resident population is declining in places. We feel this is a strategic issue. It is important to understand the trend, the underlying reasons and the implications for local communities both now and over the next 20 years.</p> <p>Section 5: The analysis would be more informative if it showed the spatial pattern of jobs and compared these to the spatial pattern of skills in the resident population and the transport links between them. This would help with the development of local policy / strategy.</p>	We cannot identify an issue with the figures indicated and they appear to be correct. Other points noted	No change to NSF
ANON-3C85-CA6Q-E	Resident	Read for information only. Though interesting to note that assurances that housing developments must not place too much burden of the increase in housing on any one area.	Noted	No change to NSF
ANON-3C85-CA6C-Z	EA	We welcome the recognition of the fact that the impacts of development do not follow LA boundaries. We would encourage catchment thinking by neighbouring authorities to be considered, especially when considering the impacts of future development on surface water resources and water quality of the counties river network.	Noted	No change to NSF
ANON-3C85-CA61-E	Define Planning & Design Ltd	<p>The ONS figures provide clear evidence of consistent growth within North Norfolk in recent years and this is expected to continue through the framework period to 2036. It is noted, however, that the employment projection for the District set out within Table 5 is significantly lower than that proposed within the North Norfolk District Core Strategy (September 2008 - Policy SS5) for the earlier period 2001-2021, despite the expectation for continued housing growth to 2036.</p> <p>Fakenham provides a significant opportunity for housing and employment growth, confirmed through the allocation of a strategic extension to the north of the town (NNDC Site Allocations Development Plan Document, February 2011 - Policy F01), part of which is currently being brought forward for development through the planning process. This is anticipated to deliver up to 950 dwellings, mixed use employment, associated community and social infrastructure, plus transport infrastructure improvements, and offers the potential for further development within the remainder of the allocated site. The site is included in Part 1 Assessment of Housing Land within the Housing and Economic Land Availability Assessment, June 2017 (HELAA Site Ref. H0054).</p> <p>Allocation of additional land to the north east of Fakenham (Site Allocations DPD – Policy F07) provides further potential for residential and/or employment development and has also been included in Part 1 of the 2017 HELAA (Site Ref. H0058).</p> <p>Given the availability and suitability of land to support the strategic growth in housing and employment development in this important market town, Fakenham will play an increasingly significant role in the future growth of the District and County.</p>	Noted, this is a matter primary for North Norfolk district council to address in their local plan	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	<p>We support the recognition in this section that there are a number of special circumstances that need to be considered when planning for growth. In particular, the needs of older people, which must not be considered in isolation, have to be carefully planned for, to ensure that they can be accommodated as part of new and existing communities, and also to ensure that services and facilities are provided in a cohesive and accessible manner.</p> <p>Designed holistically and based on sustainability motifs, these new garden settlements may lead to an enhanced housing requirement beyond the household projection numbers because they offer scope of all round environmental social and economic betterment on a fair and decent basis. We argue here that the next phase of housing in Norfolk may well expand if the conditions of design and delivery meet the aspirations of the coming generations. We suggest that this perspective should be more carefully examined.</p> <p>The employment information displays that there is slow growth projected for all of the County, with the exception of Norwich and to a lesser extent in South Norfolk.</p> <p>This prospect appears to support a need for a comprehensive economic strategy across the entire County both urban and rural. This is a framing which the Local Enterprise Partnership is clearly seeking to promote and which is explored in the following section. In our view, this exercise should be regarded as part of a comprehensive approach to understand the potential of a 'ripple' effect from the Norwich City centre and how this may generate wider investment. This perspective could be linked by a programme of new garden settlement planning, which would include wider transport improvements and which would enhance the connectivity and economic potential of other locations. In turn, this could support a range of social activities, including meeting the needs of older and younger people, who would also have access to improved non-car modes of transport, should effective use of our rural rail lines be secured.</p>	Noted	No change to NSF

ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	<p>In order to plan for growth on an informed basis, the projections of growth need to be accompanied by analysis of what aspects of place or location attract jobs and business investment; a gap analysis to consider where Norfolk needs to improve and a granular and segmented consideration of how the growth demographic is composed so that the best property response can emerge.</p> <p>So, for example, the County's very low lying performance in educational league tables should not just be seen as an educational issue, but also a locational issue given that it is common knowledge that access to high quality education is a key driver of households and businesses.</p> <p>The age demographic of in-movers to the county should be closely examined to consider impacts down-the-line on adult social care budgets particularly if these in-movers are accommodated in remote and under serviced locations which will lead in future to high levels of servicing costs to provide services and medical access.</p> <p>We would therefore argue in favour of more geographically specific housing market analysis; and more granular housing demand /need analysis to fully gain a picture of the nature of housing that needs to be built in future and the optimal location for this to be developed.</p>	In practice the methodology used in SHMAs is closely prescribed by government with little scope for proposing local variations as suggested.	No change to NSF
ANON-3C85-CAC4-X	Stalham Town Council	As previously mentioned in Section 1, I would like to see an increase in small businesses establishing themselves in North Norfolk, and particularly in Stalham.	The New Anglia LEP Economic Strategy along with other local strategies support small business start ups across the whole of Norfolk	No change to NSF
BHLF-3C85-CACM-Q	Savills	We note that the population statistics in Section 4 are provided for information only and are subject to change.	Noted	No change to NSF
BHLF-3C85-CACG-H	Persimmon homes	<p>Section 4 - Projections of Growth</p> <p>Persimmon Homes notes the various population, household and employment projections Judgement/comment on these figures is reserved until the standard methodology for assessing housing needs has been applied and results published.</p>	Noted	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	Population tables. – The paragraph on the top of page 19 doesn't appear to tally with the figures in tables 2 and 3 e.g. 15-64 3% growth in para whereas 20-64 in table 3 shows -5.6% ; & 0-16 in para shows 8.6% growth whereas table 3 shows -0.9% (0-19). While they are looking at slightly different cohorts there are quite big differences so should be checked	Figures have been updated to be clearer	Updated figures to be clearer as age ranges in text do not match tables

ECONOMY COMMENTS:

Response ID	Organisation	Answer	Officer Response	Action
ANON-3C85-CA87-P	Resident	Fails to take account of the effect of Brexit as cheap labour will no longer be available , and it be argued no labour at all will be available	It is not possible at this stage to predicted the impacts of Brexit on the Economy and the labour market. Once this picture becomes clearer the NSF can be updated accordingly.	No change to NSF at this stage
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	Tourism is a mainstream and highly valuable (circa £500m and rising fast year on year) industry essential to the well being of the North Norfolk (NN) economy; it provides employment for over 10,000 people and many live outside NN. The coastline, rivers, Broads, rural tranquility, wildlife diversity, historic assets and scenic big sky views are the main reasons why so many people come to visit and spend so much of their leisure time in NN. We know there are capacity issues which is why we need to convert more visits to staycations and increase the spend per head rather than just increasing visit volume; that relies on maintaining and improving the quality of the experience. Strategically, we have to plan to protect and preserve all of these generic attractions if we aren't to destroy the special appeal that draws people to NN. While the Framework mentions Tourism and Conservation it's extremely light touch and does little to outline principles and approaches to ensure the survival and evolution of what are very widely dispersed assets often in remote areas. There's no recognition of the imperative to understand why people find NN so attractive and thus the need to protect and preserve it. This economic factor must be a powerful counterweight in the inevitable balance to be struck over how much development and where; I suggest NN is the District most dependant on Tourism and Conservation. This crucial dependence for NN needs to be highlighted and supported with some underpinning principles and approaches to protect it and guide its evolution. I request another Agreement specific to tourism and its links with conservation generally but withy specific recognition of NN and the Broads Authority Executive areas in particular.	Section 5.3 covers Cross Boundary Strategic issues which includes a section on the coast and broads, however it is felt the NSF could be enhanced by including further information around tourism and the NSF has been update accordingly	NSF section 5 to be updated to include further reference to tourism.
ANON-3C85-CA8T-K	Hockering Parish Council	It is essential that councils work together and consider the environment when approving expansion of businesses and also consider the suitability of the location of a business, regardless of its profit-making abilities.	Noted and Agreed	No change to NSF
ANON-3C85-CAFT-1	Resident	I find it interesting to reference the economy (especially in reference to quality of life and attractiveness for people to move/start businesses) without considering the contribution of organisations other than traditional businesses (ie VCSE sector). An inclusive growth strategy should reflect with outcomes of economic development on people and areas as much as development for the sake of development. Again seems to focus on job creation and not on the quality of job opportunities - education is one aspect but you need to also have aspiration to see the need for education at the start.	Agreed, and recognised as something to be included.	NSF section 5.1 to be updated to include reference to VCSE sector
BHLF-3C85-CAF9-6	Dereham Town Council	<p>appreciate that this framework is pulling together a number of plans into a single document, put I must point out what I feel is an error which keeps repeating through all these documents.</p> <p>As I understand it the Breckland Council's employment land study was completed at a time when it was anticipated that Thetford would see a greater housing growth and Dereham less growth. Since the employment land study was completed Dereham has seen an increase allocation of housing and the duelling of the A47 between Tuddenham and Norwich has been announced. Dereham will be a reliable 15 minutes' drive from the western side of Norwich (3 fast busses an hour from Norwich) , land prices are significantly lower in Dereham than in Norwich; Dereham therefore has potential for greater housing growth and employment growth.</p> <p>We are looking at allocating additional employment land in our Neighbourhood Plan, and given that we have just lost half our employment land allocation to housing, I would be interested know how any employment land identified in the NP could be considered for classification as Strategic Employment sites and therefore protected, from housing development?</p>	The points raised are noted but are specific to Breckland DC and are a matter for their local plan.	No change to NSF
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	Other than Kings Lynn, much of West Norfolk has little employment variety other than tourism, property maintenance and elderly care. Should more be done to encourage high tech, light industry facilities in outlying areas?	Views are noted but are a matter for the BCKLWN local plan.	No change to NSF
ANON-3C85-CAXS-J	Resident	There should not be a total concentration on the "tourist" attraction of North Norfolk. As population growth shows a large percentage increase in the over 65 group in NN over future years there must be better jobs to keep younger generations (not those working in the lower paid tourist type jobs) in the area to maintain a better social balance. other opportunities to encourage other types of local businesses should not be overlooked.	Norfolk authorities recognise the need to encourage a balanced economy and encourage young people to stay in all regions however it is felt the NSF could be enhanced by including further information around tourism and the NSF has been update accordingly.	NSF section 5 to be updated to include further reference to tourism.
ANON-3C85-CAXF-5	NZRS - No to Relay Stations	<p>Tourism is obviously important but I am concerned that there is insufficient focus on the rural areas outside of the main resorts and parks. Areas like Happisburgh and East Ruston are to be blighted by cable relay station developments (to support offshore wind farms) unless developers like Vattenfall are forced to use more landscape friendly technology. Whilst the popular tourist areas like Blakeney, Holt and Burnham Market are only really available to people with higher disposable income, many people offer good quality, affordable accommodation and services in the East Ruston/Happisburgh area and similar areas, and their businesses are at risk. These are beautiful rural areas, with farmland, wildlife, quiet lanes for walking, cycling and horse riding and easy access to the coast.</p> <p>Great Yarmouth may reap the benefits of employment from offshore energy whilst rural communities take all the risk and lose their main asset - the countryside.</p> <p>NNDC and others need to be much more aware of these rural areas and the risk they are under. I tried to show a picture but the system won't take it even though it is a small file.</p>	These instillations are outside of the NSF scope to address and would be a matter for local plans and national infrastructure. However enhancements will be made to cover economic aspects of rural areas.	NSF section 5 to be updated to include reference to rural economy.
ANON-3C85-CAXN-D	East Ruston Parish Council	Does the percentage of people in employment cover just those of working age or is it a percentage of the total population as North Norfolk has the highest percentage of retired people	Employment rates only include working age people	No change to NSF
ANON-3C85-CAXW-P	NUA	•It is pleasing to see that the growth potential of the Tech/Digital sector in Norwich is highlighted as offering potential for further economic growth, and hope to be consulted in any plans in support of this growth.	Support noted	No change to NSF
ANON-3C85-CAXA-Z	West Suffolk	West Suffolk supports the approaches advocated by the Norfolk Strategy Framework. We look forward to working together to achieve growth and consider that developments around the A11 would be best achieved after improvements are made to the A11 Fiveways junction.	Support noted	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited supports economic growth in Norfolk and the drive towards hi-tech and innovative business development. Attleborough Land Limited especially supports the development of the A11 Norwich-Cambridge Tech Corridor and the Snetterton advanced manufacturing and engineering centre. Attleborough Land Limited is committed to supporting economic development by accommodating workers and their families within the SUE. The Attleborough SUE is well placed to provide homes close to new employment opportunities along the A11 corridor.	Support noted	No change to NSF

BHLF-3C85-CAJB-K	Fen Line Users Association	<p>Section 5. A10 Corridor. We concur with the County Council's statement that "there is a need to improve journey times, reliability of services and enhancement of operational capacity" on the King's Lynn-Cambridge-London routes. We draw attention to the current proposals for the 2018 timetable, which would result in longer journey times on the King's Lynn-King's Cross route. As evidence, we refer to the Media Release issued on Wednesday 19 July 2017 by the Borough Council of King's Lynn & West Norfolk and which is to be found at: https://www.west-norfolk.gov.uk/news/article/258/proposed_2018_great_northern_timetable. The Release was issued in conjunction with the King's Lynn Business Improvement District Ltd and ourselves.</p> <p>The Release states: "Despite the very welcome recent introduction of faster trains (capable of 110 mph south of Hitchin) on our line the proposals are for King's Lynn - King's Cross Fen Line services to become slower. The proposals mean average peak journeys of 113 minutes out and 110 minutes back between King's Lynn and King's Cross, an increase of up to 8 minutes, although most users will experience a greater increase. ... The concerns and request for changes and Government action expressed ... are shared with FLUA and the King's Lynn Business Improvement District (BID)."</p> <p>Govia Thameslink Railway (Great Northern) acts for Government as a management contractor. The three bodies are therefore jointly calling on the Government to:</p> <ul style="list-style-type: none"> • Explore ways of maintaining and improving existing journey times between King's Lynn and King's Cross (allowing for the additional, welcome, stops at the employment hub around the new Cambridge North station). • Honour the clear commitment in the Phase 1 consultation for trains "every 30 minutes" between King's Lynn and King's Cross during peak times (arriving 0700-0959 at King's Cross and departing there 1600-1859). This is something that has now been cut back in the current Phase 2 consultation. • Introduce trains "every 30 minutes" between King's Lynn and Cambridge/Cambridge North during peak times (i.e. arriving 0700-0959 at Cambridge and departing there 1600-1859). <p>The second track between King's Lynn and Watlington and between Downham Market and Littleport was removed as an economy measure in 1984/5. The anachronistic single line bottlenecks impose severe limits on the scheduling of trains, leading to the longer overall journey times now being proposed. The three bodies are therefore further calling on Government to:</p> <ul style="list-style-type: none"> • Adopt a minimum two-track railway between King's Lynn and King's Cross, equipped to accommodate 12-car trains, as a clear long-term strategic aim. Ensure that short-term plans are fully assessed to ensure they do not conflict with this ultimate goal. • Instruct the West Anglia Task Force to develop proposals for full re-doubling of the single line sections to remove the root cause of delays and timetabling constraints north of Ely. 	Noted and agreed	No change to NSF
ANON-3C85-CAJG-R	Resident	The proposals show no recognition that people in North Norfolk need local employment opportunities, including to supplement pensions. The area must not just become a national park with only tourism and some seasonal agricultural work. There is a real danger North Norfolk will just become a tourist, second home and commuter belt for Norwich and Cambridge; rather like the south coast of England.	Norfolk authorities recognise the need to encourage a balanced economy and encourage young people to stay in all regions however it is felt the NSF could be enhanced by including further information around tourism and the NSF has been update accordingly.	NSF section 5 to be updated to include further reference to tourism.
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Table 6 demonstrates the urgent need for improved supply of housing.	Noted	No change to NSF
ANON-3C85-CA62-F	Resident	I am very concerned that a "Food Enterprise Zone" is proposed for a green field site off the A47. This is one of the last areas of unspoilt countryside near Norwich. Presumably the idea is to completely surround Norwich with industrial areas? This will make countryside even more difficult to get to from the city and reduce residents' quality of life. Will this development lead to further road building? How does this fit with your aim of reducing car usage in favour of public transport, cycling and walking, when anyone working on the site will need to drive there?	Concerns noted however this site is of strategic importance to improve the balance spread of economic opportunity in Norfolk	No change to NSF
ANON-3C85-CAJF-Q	Resident	<ol style="list-style-type: none"> 1 The analysis given leads to concern that Agreement 9 is insufficient and watered-down to ensure that the necessary infrastructure for economic growth is delivered. If it is not, then areas of the county will house a growing retired age population (see section 4) but without the economic activity to support it. 2 The dominance of the Norwich economy is recognised but the strength and importance of the Cambridge economy to West Norfolk is not. This is a significant strategic planning flaw and needs to be addressed. 3 There has to be real consideration not only to the provision of transport infrastructure but also transport services. NCC has progressively withdrawn bus subsidy leading to young people accessing low paid jobs in real difficulty, and this will hamper growth in tourism in North and West Norfolk in particular. 4 The importance of the A10 corridor is recognised, but it appears to only be between King's Lynn and Downham Market, whereas the entire corridor through into Cambridgeshire needs a comprehensive development plan. To refer to the intra-Norfolk bit and then say that Cambs CC is developing a plan for its area means that the section South of Downham Market is not covered yet this is where much of the traffic growth is likely associated with the Bexwell employment development site. 5 In the same corridor there is mention of rail. In this area, unlike the rest of Norfolk, rail has declined and is schedule to experience a significant, planned, deterioration at the end of 2018. With this background, and without a reversal of current rail infrastructure policy, economic growth will be severely hindered, and expectations of development at King's Lynn and Downham Market not realised, unless the A10 is significantly developed instead. 6 Hardwick Extension in King's Lynn is shown as designated for industrial type employment growth but recently signage at the site implies it has been redesignated for retail growth, and this will have very considerable, but apparently not planned for, implications for road network capacity and negative impacts on the Town Centre and the local bus service network. 	<ol style="list-style-type: none"> 1 Concerns noted 2 Concerns noted however there are a number of references to this area including reference to the A10/A47 corridor 3 Concerns noted but Bus Subsidies are outside the scope of this document 4, 5, 6 Concerns noted but further details in these areas are for the BCKLWN local plan 	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	<ol style="list-style-type: none"> 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'? 	Point 10 noted and document updated. It is felt that point 11 does not add to the document.	NSF section 5 to be updated to include reference to point made.
BHLF-3C85-CA38-J	Pegasus Group on behalf of Intu	<p>5.3 Key Cross-Boundary Economic Issues and Interventions</p> <p>The role of Norwich</p> <p>The Strategy recognises that Norwich and its immediate hinterland is the 'prime economic generator in the County'. It is considered however that the City Centre should be afforded more recognition in its role of generating local employment and creating places where people want to live, visit and work.</p> <p>An additional sentence should be introduced under the heading 'The role of Norwich' as follows (at the end of the second paragraph):</p> <p>A healthy and vibrant Norwich City Centre is essential to Norfolk's economic well-being and its retail and leisure needs should be met in full to ensure its continued vitality and viability.</p>	We feel the wording in the role of Norwich covers the point made already.	No change to NSF

<p>BHLF-3C85-CA3P-A</p>	<p>Heaton Planning Limited on behalf of Brett Aggregates</p>	<p>Section 5 – The Economy</p> <p>Paragraph 5.3 Key Cross Boundary Issues and Interventions</p> <p>This section of the document refers to the strategic economic matters which should be addressed through Development Plans. As referred above, it is our view that minerals and waste development should be referenced as a strategic priority. The latest Local Aggregate Assessment (October 2016) identifies Norfolk as a County with significant sand and gravel resource and up to 30% of total production is exported outside of the County. In addition,</p> <p>Norfolk imports up to 70% of all its crushed rock requirements. This is a significant cross boundary issue which should be addressed as an economic strategic priority. As well as demanding a large proportion of material imports for infrastructure needs, the Norfolk area will need to ensure that the local highway network is adequate to transport mineral to serve local development needs within as well as that outside of the County. The County will need to ensure that it plans for a level of mineral provision to take account of growth and infrastructure requirements from within the County as well as demand from outside the County boundary.</p>	<p>Whilst approximately 20% of Norfolk’s total production of sand and gravel was exported out of the County in 2013 a similar amount was imported into the County. Aggregate movements are discussed in the Local Aggregate Assessment and it is considered that whilst neighbouring planning authorities continue to plan to supply the demand of their own areas, Norfolk does not need to make planned provision to supply additional aggregates. Therefore it is not considered that this is a strategic cross-boundary issue to be addressed in the NSF and it will be adequately addressed through the production of the statutory Minerals and Waste Local Plan.</p> <p>Whilst Norfolk imports over 70% of all its crushed rock requirements, this is due to Norfolk’s geology. Therefore it is not possible for this situation to change through any statutory plan or strategic framework and it is not considered necessary for this to be addressed as an economic strategic priority in the NSF. The County will ensure that it plans for a steady and adequate supply of aggregates. The level of mineral provision will be determined through the Minerals and Waste Local Plan Review, in accordance with National Planning Policy and Guidance, which detail the information to be included within a Local Aggregate Assessment, including possible future demand. It is not considered that replicating this process in the NSF would add any value to the statutory Minerals and Waste Local Plan process.</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CA33-D</p>	<p>Norfolk Area of the Ramblers</p>	<p>Growth: The plan clearly identifies some important trends which are likely to occur within this period. It notes in particular that there will be growth in terms of population, economic development (including tourism) and housing. Much of the growth in jobs is expected to occur in the greater Norwich area but corridors of growth are identified between Cambridge and Norwich, King’s Lynn and Cambridge and along the A47 corridor between Norwich and King’s Lynn. A number of interventions are planned in a new economic strategy to be published in 2017. Population as a whole is projected to grow by 14 % (2014 to 2036) with most of the growth occurring in the over 65s population which is projected to increase by 46%. This increase in the over 65s is especially marked in South Norfolk, Breckland and North Norfolk. Despite the relatively stable population for the under 65s, the number of jobs is projected to grow by over 60,000 of which about two thirds is in the Norwich area. It is expected that housing will grow to accommodate the growth in household formation but that excludes the need for social care where a deficit of over 8,000 care home places is projected (as against 9,900 care home places and a deficit of 600 now). Comment: With a recognition of increasing longevity there is a growing demand from the over 50s for physically active recreational activities which help manage risks of ill health through diabetes, heart attacks and strokes. Awareness of risk, including the lack of care facilities, appears to be driving more healthy behaviour and creating a fitter more active cohort of retirees. Health walking, rambling and strolling activities are being promoted as an effective and safe means of retaining good health and we are likely to see a significant growth in these activities as the population of over 65s increases. Variety of route and surroundings is an important feature of walking. The nature of the demand varies and ranges from individual short circular walks or strolls of up to 3 miles, brisk organised group walking usually around 3 miles and longer group led circular walks, mostly between 4 and 10 miles. Longer walks of up to 20 miles are usually the choice of younger and fitter walkers. City walking as an alternative to the use of cars will grow too but this is a more journey based, repetitive activity. We comment later on the steps already taken to develop rural walking infrastructure and the challenge of maintaining a viable network of public rights of way (PROW). At this point our main point is that the growth of the over 65 population is very significant and we believe that it is an omission of the report to fail to reflect the growth in their walking activities and the likely consequences for green infrastructure.</p> <p>Economy The document notes the importance of tourism businesses, which are more dispersed than many other economic activities - and far wider than “Norfolk Coast, the Broads and the Brecks” listed. Comment: Norfolk has a number of promoted ‘Norfolk Trails’ across the county, plus, in many locations (though not all), a good network of PROW. Together these can constitute an opportunity to promote the county as a good destination for walkers and cyclists, but one that is not located within specific localities.</p>	<p>Work is being completed around recreation pressures and the reference to recreation in the NSF will be updated.</p>	<p>Reference to recreation to be included section 5.</p>
<p>ANON-3C85-CA6Y-P</p>	<p>King's Lynn Business Improvement District Ltd (KLBID)</p>	<p>1 The dominance of the Norwich economy is majored in the NSF and we recognise the fact, but the very different economy in West Norfolk is largely ignored. To take account of it requires some modification to investment policies and agreements and this is essential.</p> <p>2 Infrastructure provision is discussed in much greater detail in answer to question 15, but it is clear that if the economic analysis is flawed then so too will be the infrastructure investment decisions. As it stands, the NSF is in danger of leading to flaws in those decisions and this needs to be rectified from the outset.</p> <p>3 The vision for reduced need to travel to work, retail, employment and education is welcomed but this also has significant spatial planning implications. The NSF is directly at odds with current West Norfolk policies which have been to focus employment and retail on the edge of the town, which by definition makes it less accessible by sustainable means of transportation and more so by car use. This is therefore encouraging modal shift from other forms of mobility towards the car, contrary to the NSF vision. The apparent recent redesignation of Hardwick Extension employment area (aka Morston Point) to be majored as a 33 acre retail development area is evidence of this. Not only do such edge of town developments lead to greater use of unsustainable transport modes, it also has the potential to undermine the historic town centre retail offer further making that less sustainable as well. It is not credible for the Borough Council to consider signing to the NSF whilst encouraging such unsustainable development. Ways in which this can be mitigated are in answer to question 15.</p>	<p>Points are noted however it is considered that towns in the West of the region are not ignored in the NSF, there are a number of areas of the county where the economy differs, the aim of the NSF is to identify the key cross boundary issues for the county. The matters raised regarding the West of the region are a matter for BCKLWN.</p>	<p>No change to NSF</p>

<p>BHLF-3C85-CA3J-4</p>	<p>The Somerleyton Estate</p>	<p>The Framework goes on to state that “The Norfolk Local Authorities are committed to strengthened collaboration and focus on new initiatives and interventions to help nurture economic growth in higher value, knowledge based sectors across Norfolk”.</p> <p>If these ambitions are serious then the Somerleyton Estate urges the Norfolk Strategic Framework Partnership to recognise the opportunity provided by value added tourism and to develop shared objectives to facilitate and support resorts such as Fritton Lake whilst more ‘traditional’ seaside tourism offers wane.</p> <p>In Section 5.3 ‘Key Cross-Boundary Economic Issues and Interventions’ there is a section on the ‘Norfolk Coast, the Broads and the Brecks’. This section should be expanded and renamed as ‘Norfolk’s Visitor Offer’ or similar in order to avoid missing an opportunity to support the whole of Norfolk’s tourism industry.</p> <p>In Section 5.4 ‘Strategic Principles of Economic Success’ and under the sub-heading ‘Supporting future economic growth’ the Somerleyton Estate request that an additional bullet point is added to read:</p> <ul style="list-style-type: none"> • Facilitating the evolving tourism industry whilst safeguarding the environment upon which it relies. <p>In Section 5.4 ‘Strategic Principles of Economic Success’ and under the sub-heading ‘Connectivity’ the Somerleyton Estate request that the first bullet point is amended to read:</p> <ul style="list-style-type: none"> • Supporting employment allocations and the rejuvenation of town centres and high streets as retail destinations that minimise travel distance and maximise the use of sustainable transport modes. <p>Tying in to our comments on road improvements below it is important that improving roads links is considered alongside the vitality of retail centres such as Great Yarmouth as improved transport links can also divert shoppers and visitors, by car, from our town centres to out of town retail parks which is less sustainable than focussing such activity on the high street.</p>	<p>We recognise the points raised and reference to tourism are to be strengthened in section 5 of the NSF</p>	<p>NSF section 5 to be updated to include further reference to tourism.</p>
<p>BHLF-3C85-CA3J-4</p>	<p>The Somerleyton Estate</p>	<p>It is important to note that more short or additional holidays are now taken in the UK rather than long holidays, and the long main holiday in the UK has declined significantly. The growth of short breaks is reducing seasonality but this is predominantly weekend based in its demand, and seaside destinations have experienced lower growth than city destinations.</p> <p>The consequences of these trends for Great Yarmouth are likely to be:</p> <ul style="list-style-type: none"> • increasing demand for quality, convenience and security • increasing demand for activities, relaxation and learning skills • increasing demand for 1–3 night holidays • increasing demand for ‘one person’ holidays • increasing shoulder month demand • increase in grandparents taking grandchildren on holiday (and a desire for more traditional holiday activities) • a family market more accustomed to higher standards and broad range of leisure options • growth in VFR market (Visiting Friends and Relatives) • arts, culture and history featuring strongly in destination choice • increasing success for new, authentic and innovative holiday concepts and products that distinguish themselves by added value • increasing demand for ‘holidaying with the tribe’; be they friends, sporting groups, reunions etc. “ <p>The Framework states “Many districts have their own economic development strategies, and there is a good record of collaboration on specific economic development projects. This Framework provides the opportunity to lay the foundation for developing strategy and such cooperation going forward”.</p>	<p>See above</p>	<p>NSF section 5 to be updated to include further reference to tourism.</p>
<p>BHLF-3C85-CA3J-4</p>	<p>The Somerleyton Estate</p>	<p>Comments about Section 5 - The Economy</p> <p>Section 5 sets out the Strategic Economic Objectives required to realise the economic potential of Norfolk. Absent from the bullet point list of objectives, as with Section 2 discussed above, is tourism. Please add the following bullet point as an important Strategic Economic Objective:</p> <p>“To realise the economic potential of Norfolk and its people by:”</p> <ul style="list-style-type: none"> • Supporting the County’s tourism offer and the environment upon which it relies. <p>In the Introduction (Section 5.1) the Somerleyton Estate is heartened to see tourism get its first mention in the Framework document as one of the key business sectors. However tourism is then subsequently described as a lower wage, lower skill sector which along with other sectors such as food production and agriculture is said to impact on future economic growth.</p> <p>The Somerleyton Estate is concerned that the Framework may miss a vital opportunity to support a resurgent ‘Value Added’ tourism sector providing, though resorts such as Fritton Lake, opportunities for “more frequent, higher quality and good value breaks”. Please see links below for evidence of the benefits of value added tourism to the emerging quality short breaks tourism market in East Anglia:</p> <p>http://www.newanglia.co.uk/our-priorities/sector-groups-and-contacts/tourism/</p> <p>http://www.newanglia.co.uk/wp-content/uploads/2013/11/CTC-New-Anglia-final-report-Jan13-Web.pdf</p> <p>Also from the Great Yarmouth Tourism Strategy and of direct relevance to the Fritton Lake Resort (http://www.frittonlakelodges.co.uk/) offer:</p> <p>“The Great Yarmouth Opportunity</p> <p>Great Yarmouth, with its thriving public/private sector tourism partnership, sees itself as a key partner in the delivery of these national and regional objectives.</p>	<p>See above</p>	<p>NSF section 5 to be updated to include further reference to tourism.</p>

BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	<p>Section 5 The Economy (and Strategic Employment Sites)</p> <p>Section 5 - 5.2: Although much is made in the Introduction (Section 2.1) and elsewhere about the importance of exploiting links to thriving markets in Cambridge and the wider South East, it appears that the bulk of strategic growth sites are clustered around Norwich and biased towards the A11 Road Corridor. Surely more focus should be placed on the Kings Lynn-Cambridge-Stansted (M11)- London Corridor? This offers greater (and growing) opportunities for business growth / interactions and access to job opportunities in places where the job market is thriving (and demand outstrips supply) via sustainable commuting patterns along the railway line?</p> <p>Norfolk Coast, the Broads and the Brecks</p> <p>This section pays scant attention to the north coast / AONB – recognising few of the unique qualities and current pressures. It would be helpful in particular to consider the value of ecosystem services, their contribution to the economy and the economic implications of growing pressures on the AONB – both from tourism, growth in housing and growth in second home ownership. What are the challenges going forward and how can a cross-boundary approach help solve these? This may help support any post-Brexit Conservation issues.</p> <p>Mention is made in this section of the Shoreline Management Plans and notably to the co-operation between the coastal districts, Broads Authority, Waveney District Council in Suffolk, and the Environment Agency. There are however no clues as to what is being done to “developing understanding of the technical and political challenges involved, and coordination of efforts to address these”. For example, Holme is faced with the future possibility of an Inter-Tidal Zone covering some 40% of the Parish (including the National Nature Reserve at Holme Dunes). What strategic plans are being made to compensate for this – both in terms of loss of local amenity, damage to freshwater habitats and damage to the local economy?</p> <p>A10 Corridor</p> <p>The potential of the A10 Corridor is picked up in this section (although the distinction between road and rail connections is not always clear). Is the County Council collaborating with Cambridgeshire County Council in its studies of the economic potential and transport options for the route north of Cambridge (and if so it would be helpful to include this in the NSF document)? What plans are in place to exploit the imminent availability of longer peak hour trains from King’s Lynn to Cambridge / Kings Cross (by the end of 2018) and to help West Norfolk residents access the opportunities associated with planned growth around Cambridge North? Is there an integrated transport strategy to support the exploitation of these opportunities? It would be helpful to explain the approach in this document. There is considerable support for the re-introduction of a rail service between Hunstanton and Kings Lynn. This is a strategic issue and could completely change the accessibility surface of the west of the County, bringing benefits to the economy / regeneration and considerable benefits in terms of relief to congestion and associated traveller time savings on the A149. Should the NSG be paving the way for a study of the options (heavy vs light rail / tram or a guided bus that could provide flexibility beyond the rail termini)?</p> <p>This point is also relevant to Section 5.4 of the NSF – Connectivity.</p>	Regarding the first point, the NSF does cover the A10 corridor which covers the Norfolk section of the area mentioned. Regarding the second point the coastal area is already covered within the Economic section. Regarding the third point, the points raised are matters to be taken forward in the SMP. Finally regarding the A10, it is not practical to cover the points raised in a Strategic document like the NSF and is a matter for more specific local plans.	No change to NSF
ANON-3C85-CA6Q-E	Resident	It has been observed that Scottow Enterprise park is a strategic economic area of importance, and thus guarded against conversion of industrial area into housing area. However, the outlying areas which will then take the burden of housing must be assured that the infrastructure to support the domestic side of life will be considered as part of the strategy.	Point noted however this is a matter to be addressed in local plans.	No change to NSF
ANON-3C85-CA61-E	Define Planning & Design Ltd	The emphasis on realising the economic potential by seeking to facilitate development to support the region’s business sectors and clusters is fully supported. Moreover, it is considered essential to provide for job growth in line with housing provision and to improve the alignment between locations of workplaces and homes. In doing so, whilst the strategic influence of infrastructure improvements between the main urban settlements may be prioritised, it will also be important for Local Authorities to focus on securing digital and transport connectivity generally within and between settlements across the region that offer development opportunity. In doing so it will support the potential for growth across a wider area and the rural economy, supported by the market towns.	The NSF is consistent with the point raised.	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	<p>Hoveton Parish Council was pleased to note that the nearby Scottow Enterprise Park has been included on the list of Strategic ‘Tier One’ Employment Sites, and that it will be the focus of investment to drive increasing economic development. However, the Council would also like to see a similar commitment being made towards investment in the local tourism industry, which is so important to the Broads, the coast, and rural villages. For North Norfolk, tourism is worth about £500 million a year, and the industry employs over 10,000 people in various roles; it’s the equivalent of several Tier One employment sites. Similarly, the wider North Norfolk economy is very diverse – medium, small, and micro businesses are the life blood of our community, and the Parish Council feels it is vital these smaller businesses are helped to thrive.</p> <p>The Parish Council would also welcome a strong and visible commitment to the regeneration of local village centres. Nearby market towns such as North Walsham and Stalham have been adversely affected by the arrival of large supermarket chains, but Hoveton has also suffered in recent years, in this case from the closure of several local bank branches and a noticeable rise in the number of vacant commercial properties (the derelict ‘waterside rooms’ on Station Road being one notable example).</p> <p>As the draft Norfolk Strategic Framework states: “economic benefits of the Coast, the Broads and the Brecks include not only their attraction for tourism and recreation, but also their contribution to quality of life, and hence the attractiveness of Norfolk as an area to live, work and to locate a business. The economies of these areas are dependent on businesses, infrastructure and environmental protection in surrounding areas.” Hoveton Parish Council agrees with this statement and believes this highlights the need for the continued provision of local jobs, as well as the importance of protecting the local countryside, areas of conservation and wildlife habitats (because the local countryside is why many visitors come to Norfolk and spend their money).</p>	The NSF is consistent with the points made however some of the details raised are for local plans to address.	No change to NSF
BHLF-3C85-CA3G-1	Dereham Town Council	<p>The County’s focus on economic development seems to focus on the A11 Cambridge – Norwich Technology corridor (figure 6 page 27) but seems blinkered to the rest of the county. While there is no doubt that the A11 offers potential for economic development the same is equally true for other parts of the County with good communication links to Norwich. The economic development focus is important because it forms the basis for identifying Tier 1 Strategic employment sites (figure 5 page 24). Tier 1 Strategic Employment sites are important because they are the only employment sites which are protected from loss to alternative use such as housing. Even though employment sites are allocated in Dereham in the Local Plan these are not protected for employment use as has been demonstrated in Dereham recently it is all too easy for to housing.</p> <p>The Town Council has aspired to have strategic employment site in Dereham, the argument for such a site is that Dereham is very close to Norwich with good communication links the completion of the dualling of the A47 will improve connectivity even further. Arguments used in the Framework to support the focus on the A11 corridor could equally be used to support the inclusion of an Accessible Extension to the A11 tech-corridor along the A47 to Dereham.</p> <p>The A11 corridor is seen as a key corridor because of its recent dualling. The same argument could be made for the completion of the dualling of the A47 between Norwich and Dereham. The completion of the dualling of the A47 between Dereham and Norwich is noted on page 14 and acknowledged that it could bring economic benefits, there is however no strategy in place to exploit benefits of the Government’s investment in Dereham.</p> <p>The framework states that “Norwich and its immediate hinterland is the prime economic generator for the County”, (page 26). Dereham sits well within the Strategic Functional Economic Market Area for Norwich (page 23). It could therefore be argued that Norwich and the A11 corridor should not be considered as the only economic growth areas. Any area within the Norwich Functional Economic Area with good transport links should be looked at as strategic employment areas (e.g. Dereham).</p> <p>The A47 Corridor is discussed on page 28, where it states that it “acts as a break on economic growth, hindering investment”. While this may be true, if the entire length of the A47 is looked at as a whole, but not if the section between Dereham and Norwich is considered. The framework recognises that improvements to the A47 will “unlock jobs, increase GVA and attract additional private investment” but even though such improvements to the A47 (dualling between Tuddenham and Norwich) will be completed by 2020 the Framework does not recognise the potential of this investment for economic development in Dereham.</p> <p>Greater focus should therefore be given to economic development and employment growth in Dereham, allocating Tier 1 employment sites.</p> <p>The employment projections are based on a retirement age of 65, pension age is set to increase to 67 during the life time of this framework this will have the effect of adding additional numbers to the working age population, this does not seem to have been taken into account.</p>	The points raised are noted however there is more to the strategic importance of the A11 than dualling, eg linking Cambridge to Norwich. The matters raised regarding allocation of employment sites in Dereham are outside the scope of the NSF and are a matter for Breckland local plans.	No change to NSF

ANON-3C85-CA3Y-K	Lanpro Services Ltd	<p>We recognise and support the value and importance of job creation. We note that only 34% of the target job creation of 95,000 between 2012 and 2026 has been met, while only 16% of the required housing and just 2.6% of the productivity gap has been closed.</p> <p>This indicates that although progress has been made, there is not a strong record of delivery against economic and employment targets. The Framework recognises that additional economic interventions are required. The £200m private sector investment is welcomed, but we feel that a more proactive and positive planning approach could assist in enhancing this position.</p> <p>The focus on strategic employment sites is welcomed, but it is a disappointing that the same approach is not always made with regard to locations for strategic housing. The employment locations selected leave large amounts of the County, particularly the central more rural area, with no significant employment investment and no real prospect of new jobs being created. Within this central area there are also examples of locations where there is low salary and skill attainment and aging populations.</p> <p>The proposed approach of a predominance of small housing sites in existing towns and villages, will in some part respond to this deficit. Nevertheless, we feel that this approach will not deal with some of the fundamental issues of poor quality unaffordable housing not currently available to most employees, particularly those working in agriculture.</p> <p>Larger sites and new settlements can provide the potential to provide a higher quantum of affordable housing, which will support the local economy by providing good quality homes. Good quality housing supports better productivity particularly where workers are in attractive environments, which provide easy access to work places.</p> <p>Furthermore, a new attractive garden town or village community might encourage greater leakage of economic benefits from existing centres into central Norfolk, particularly when there are excellent public transport connections.</p> <p>We therefore recommend that economic investment cannot be considered in isolation. It needs to be an integral part of a strategic approach to settlement planning. This should be linked to existing and potential economic hotspots, possibly through new road and rail infrastructure investment, and provide opportunities for a quantum of development that will enable the levels of affordable housing required to meet the needs of a large number of low paid workers found in many parts of Norfolk. This could also help encourage a 'ripple' of economic investment from the major centres, whilst also reflecting modern ways of working, such as the growing and predicted future trend of home working. This would help develop local economies, without detriment to the main centres of growth and investment.</p>	The points raised are noted however the allocation of sites and a new town are for local plans to address.	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	<p>p23 - reference is made to the Industrial Strategy. See representation attached which was made to BEIS on the failure of the Industrial strategy to recognise 'place' as a key dimension of competitiveness.</p> <p>The BG PL&M group would advocate the Norfolk's qualities are heightened through robust planning based on the identification of the key assets and qualities of the county. This will stimulate business and investment commitment as more business on a global basis are making locational decisions on the basis of the quality of life proposition and attractiveness of location. This is on the premise of a full and efficient digital coverage. This must be the NDF number one infrastructure priority.</p> <p>See 'Place Competitiveness' document attached earlier setting out research we propose to undertake to consider the critical characteristics of 'place competitiveness' in the new economy, taking into account the key geographical characteristics of Norfolk through interrogation of a range of business in-movers and to Norfolk and rapid growth companies.</p> <p>The gap divergence DCLG economic and housing forecasts needs to be more fully interrogated and the implications thought through. If DCLG is making false assumptions on the level of potential growth this will either foist the county with undeliverable sites, or unproductive in migration, which will be expensive to service in the long run.</p> <p>It is not the job of the county to service the housing problems of the metropolitan areas with cheap land.</p>	Key issues raised are dealt with in the New Anglia LEP economic strategy.	No change to NSF
ANON-3C85-CA31-B	Wroxham Parish Council	<p>Wroxham presently has few employment areas with none of them industrial. The emphasis on tourism is welcomed however it is pertinent to note that growth in Wroxham is inhibited in one way or another by the inadequacies of the A1151. Congestion, pollution and gaining a reputation nationally as an unwelcome bottleneck.</p> <p>Consideration therefore has to be given to by-passing Wroxham and Hoveton in order to improve traffic flow, reduce pollution and allow both villages to regain reputations for peace, relaxation and must visit locations.</p> <p>There is an acknowledgement that the nearby Scottow Enterprise Park has been included on the list of Strategic 'Tier One' Employment Sites, and that it will be the focus of investment to drive increasing economic development. It should be noted that this will further add to the traffic and pollution on the already congested A1151.</p> <p>The Parish Council would also welcome a strong and visible commitment to the regeneration of local village centres. Nearby market towns such as Alysham, North Walsham and Stalham have been adversely affected by the arrival of large supermarket chains, but neighbouring Hoveton has also suffered in recent years, in this case from the closure of several local bank branches and a noticeable rise in the number of vacant commercial properties (the derelict 'waterside rooms' on Station Road being one notable example). A bypass would act as a stimulus to economic development in these areas.</p> <p>Wroxham Parish Council believes there is a need for the continued provision of local jobs, as well as the importance of protecting the local countryside, areas of conservation and wildlife habitats (because the local countryside is why many visitors come to Norfolk and benefit the local economy).</p>	The points raised have been noted, the relevant planning authorities will continue to address the local issues	No change to NSF
ANON-3C85-CA35-F	Tunstead & Sco Ruston Parish Council	Greater support by moving public offices and workers away from Norwich and to Gt.Yarmouth and Lowestoft. Those working in Gt.Yarmouth and Lowestoft should be offered incentives to live locally in those areas and if necessary be given disincentives not to live in Norwich and work outside the city.	The point raised is outside of NSF remit to control.	No change to NSF

BHLF-3C85- CAC8-2	Suffolk County Council	<p>5.2 Strategic Employment Sites It would be useful in moving forward to have further discussions in relation to a common policy protection approach to strategic sites which have Enterprise Zone status in particular where they are part of a common initiative such as Great Yarmouth and Lowestoft</p> <p>5.3 Key Cross-Boundary Issues Cambridge to Norwich Technology Corridor Suffolk LAs are supportive of this initiative and are making contributions towards the further work being carried out. The opportunities for the West Suffolk area should also be noted. The role of the A11 in this corridor is key and the improvement of the Fiveways Junction at Mildenhall remains as an on-going concern for the effectiveness of this route. The Suffolk LAs would welcome a reference in the Framework of the importance of Highways England dealing with this issue.</p> <p>Ports of Great Yarmouth and Lowestoft The common issues for these two towns have been recognised for many years and the linkages have been strengthened recently by both of their involvement in the offshore wind energy industry. There should be continued close cooperation between the respective councils, not least because planned growth in both is likely to lead to development towards each other. Within Suffolk, the proposed Third Lake Lothing Crossing is likely to lead to transport benefits for southbound traffic from Great Yarmouth as well as for Lowestoft itself.</p> <p>Broads and Brecks This section refers to coordination across planning authority boundaries to maximise economic benefits. It would be useful to include wildlife in the list of subjects to be tackled. The section refers to the formal status of the Coast AONB and the Broads National Park. It might be appropriate here to refer to the importance of the Brecks, having the richest assemblage of rare biodiversity anywhere in the UK. The Framework refers to joint working to gain a better understanding of impacts on environmental assets. This should refer to joint working within Norfolk and cross-border. This could be amplified by a sentence such as "Joint approaches to strategic HRA mitigation should particularly be developed where necessary, following the RAMS (Recreational Avoidance Mitigation Strategy) developed for the Thames Basin Heaths, Poole Harbour, the Solent and in East Suffolk (Ipswich, Babergh, Suffolk Coastal DCs), specifically to overcome the challenges of multiple LPAs overlapping European sites (SACs, SPA & RAMSAR)"</p>	Ongoing work between these authorities in relation to Great Yarmouth and Lowestoft is welcomed and already taking place. Wording changes have been made around these points.	NSF section 5 to be updated to include further reference environmental aspects and Great Yarmouth and Waveney joint working.
ANON-3C85- CA3K-5	Natural England	<p>Norfolk Coast, the Broads and the Brecks p29 The wording of the third paragraph on the page is a bit clunky and unclear and we suggest it could be re-worded as follows:</p> <p>"The quality, importance and diversity of the natural environment, including the Coast, the Broads and the Brecks, is reflected in the numerous national and international designations, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites, and Sites of Special Scientific Interest (SSSIs), and protected landscapes (Norfolk Coast Area of Outstanding Natural Beauty and the Broads "National Park"). The planning authorities have a role in helping to protect and manage these assets, along with Natural England, the Environment Agency and a wide range of non-statutory environmental and community organisations. Ensuring that new development can proceed sustainably without harm to protected sites or species, or to biodiversity or geodiversity in the wider environment, is a particular challenge. Through joint working and cooperation across planning authority boundaries, a better understanding of the potential impacts from development (especially relating to housing and recreation) is being developed, and new ideas and best practice for monitoring and mitigating any impacts are being shared ."</p>	Agree to change the wording as specified	Paragraph updated
ANON-3C85- CAC4-X	Stalham Town Council	As mentioned in Section 1, I would not wish to see Stalham lose businesses at the expense of extra housing.	This is a matter for local plans but there is nothing to suggest this will happen.	No change to NSF
BHLF-3C85- CACM-Q	Savills	<p>Objection is raised to the wording of the third bullet of the listed Strategic Economic Objectives (p22), as this implies that authorities should only seek to provide the level of job growth necessary to serve the population. This is considered to be a particularly conservative approach which is contrary to the overall vision for the County and its aspirations to significantly uplift economic performance in Norfolk as outlined on page 7.</p> <p>Instead, we would suggest that an appropriate level of housing be provided to stimulate and drive economic growth. Not only is housing necessary to support existing business but an available workforce would attract future investment into the County in the long term. We would therefore encourage the Council to apply an employment uplift and suggest the following wording: "Providing the level of housing necessary to support Norfolk's growing economy and improving the alignment between the locations of workplaces and homes."</p>	Discussions with authorities involved in the production of the NSF have concluded that the existing wording in the NSF is preferred	No change to NSF
BHLF-3C85- CAC2-V	Albanwise Ltd	<p>Agreement 8 - The above list of locations are the Tier One Employment sites and should be the focus of investment to drive increasing economic development in key sectors, and protected from loss to other uses. Summary: Albanwise Ltd supports the inclusion of Bexwell as a Tier One Employment Site as identified in Table 7 and considers it is well placed as a location for strategic employment growth given its access to the strategic road network (including planned improvements on the A10 corridor), committed employment land which benefits from an extant permission and the use of part brownfield land associated with the former airfield. The site forms part of Albwanise's significant landholding in this location which also includes land to the North of Downham Market being promoted through the King's Lynn and West Norfolk Local Plan review for residential development. Although predominantly green field, the principle of development at Bexwell Business Park has been established for many years through an extant permission for employment uses and a hotel and golf course. It also comprises part brownfield land associated with the former Bexwell airfield. It remains available and is being promoted for employment purposes. Section 7.7 notes that away from the strategic road network, Norfolk's roads are largely rural leading to slow journey times. Therefore, development sites should be focussed on the strategic road network: including at Bexwell Business Park which benefits from excellent access to the strategic road network being located directly on the A10. It can make a significant contribution to the employment needs of King's Lynn and West Norfolk, and can act as a growth location as identified in the New Anglia Strategic Economic Plan. As noted in section 5.3 of the Strategic Framework the New Anglia SEP identifies the transport corridor of the A10, and parallel rail line from King's Lynn to Cambridge as a strategic growth location. Cambridgeshire County Council is currently investigating enhancements to the corridor to stimulate economic growth and enhanced rail connections are planned by the end of 2018 with longer peak hour services running to King's Lynn. Large-scale job growth in the corridor at Downham Market compliments this aspiration and as a strategic employment site it can take advantage of planned improvements to the strategic transport corridor. Furthermore, Bexwell is in close proximity to part of Albanwise's estate at North Downham Market being promoted through the King's Lynn and West Norfolk Local Plan review. Opportunities exist for a sustainable growth strategy, including the linked provision of homes and jobs at North Downham Market. This could include sharing infrastructure costs such as access from the A10 and improved pedestrian connections between Bexwell and the eastern edge of Downham Market. It should also be noted that regular discussions have taken place with the Economic Development Officers at King's Lynn and West Norfolk Council who feel it has significant potential to provide new jobs in the Borough.</p>	The points raised are noted however the matters raised regarding employment sites are outside the scope of the NSF and are a matter for local plans.	No change to NSF

BHLF-3C85- CACN-R	Great Yarmouth Port Company Peel Ports	<p>We respond as the Great Yarmouth Port Company as operators of the Port on behalf of the Great Yarmouth Port Authority and welcome the development of this strategic framework for the seven districts.</p> <p>Peel Ports Group purchased Great Yarmouth Port Company in December 2015 with the aim of both expanding our influence on the east coast and to diversify into the offshore oil & gas and wind industries. Therefore we are pleased to see that the “boosting of inward investment and international trade” through means which include sea is included in Agreement 3, Proposed Shared Objective and is considered one of the key drivers to realising the economic potential for Norfolk.</p> <p>We also note that the role of the Port is recognised in Section 5, The Economy, as a strategically significant economic and infrastructure resource. We would like to see a useful map which identifies the enterprise zones proximity to the Great Yarmouth Port and the Outer Harbour and how this further enables the offshore energy sector in this area.</p> <p>Construction works to enhance the port infrastructure at Great Yarmouth Outer Harbour for several high profile offshore wind projects began in October 2016. A £7 Million investment by Peel Ports Great Yarmouth will support the construction of primary infrastructure and ground works for the Galloper Wind Farm and East Anglia ONE Wind Farm projects. Construction work includes the delivery of a yard storage and marshalling area, as well as the installation of heavy-lift quay facilities. This area will serve as the arrival hub for many of the key components of the Galloper Wind Farm such as nacelles, blades, towers and electrical modules, and as the base for the tower pre-assembly and nacelle preparation. These components will be shipped in from their manufacturing facilities and after preparation they will be loaded onto the specialist installation vessels for transport to the nearby development sites.</p>	Support noted, the map referred to is too detailed to be included within the NSF as we would need to include one for all employment sites referred to.	No change to NSF
BHLF-3C85- CACG-H	Persimmon homes	<p>Section 5 - The Economy (Agreement 8-9)</p> <p>Persimmon Homes notes the location of Strategic Employment Sites (Agreement 8), and the aim for them to be the focus of investment. These sites should be supported in Local Plans by sufficient housing sites and investment in infrastructure to deliver housing. Where non-strategic employment sites are no longer viable for employment use they should be released for housing.</p> <p>Persimmon Homes note the requirement for Local Plans to include policies and proposals that recognise the importance of cross-boundary interventions to help deliver employment aspirations (Agreement 9), the same is true for housing. Support and interventions will also be required for cross-boundary housing schemes especially where they support cross-boundary employment ambitions</p>	Noted these matters are to be dealt with in local plans	No change to NSF
BHLF-3C85- CACD-D	South Norfolk Council	<p>Key cross-boundary economic issues and interventions – chapter 5.3</p> <p>The Council feels that the document concentrates too much on the major employment sites in the county. Whilst this is understandable, as a largely rural economy, the NSF should include some additional text recognising the important role that the rural businesses currently play, and will continue to play, in the county's economic performance.</p> <p>In addition, the Council believes that the omission of the A140 in the list of principal strategic economic matters in this part of the document is somewhat surprising. The corridor has significant housing growth planned (at least 1800 homes in Long Stratton alone), the Long Stratton bypass, the main Norwich-London railway line passes through and it connects the two key settlements of the New Anglia LEP area, Norwich and Ipswich. Some appropriate text to address this lacuna is asserted to be necessary.</p>	Agree to add reference to general rural economy	Section 5 to be updated to include further information regarding rural economy
BHLF-3C85- CACA-B	Ashmanhaugh Parish Council	<p>The Economy: Tourism: should not be under-valued as a driver to the economy and there should be an emphasis on a high quality offer with associated income. Agriculture: whilst this does not employ the number of workers it once did, agriculture ensures the protection of the rural countryside. It needs to be seen as a multi-faceted industry which not only drives the rural economy but creates the environment which results in such a high quality of life and draws tourists and new residents alike.</p>	It is felt the NSF could be enhanced by including further information around tourism and the NSF has been update accordingly	NSF section 5 to be updated to include further reference regarding tourism.
BHLF-3C85- CACD-Y	Norfolk County Council	Acronyms have been used without previously being stated in full. (SAC, SPA, SSSI)	Noted and document updated	Paragraph updated
BHLF-3C85- CAE4-Z	North Norfolk District Council	<p>Agreement 8- Does not support this agreement as currently drafted - As a minimum it is considered that this Agreement should be broadened to make reference to the importance of other areas of the local economy such as strengthening the role of market towns, tourism and other rural growth sectors. This breadth in the economy is reflected elsewhere in the Framework document and should follow through into a revised Agreement.</p> <p>Agreement 9: Agreed.</p>	Agree to add reference to general rural economy, tourism and market towns	Section 5 to be updated to include further reference regarding market towns, rural economy and tourism
ANON-3C85- CAXW-P	NUA	•We would underline the importance of culture in supporting the economic growth of our city and county. It is a key contributing factor to a sense of place, and an important lever when attracting new business.	The point raised is noted	No change to NSF
BHLF-3C85- CA6A-X	Broads Authority	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.	Agriculture not part of the planning process but is recognised as a vital part of the Norfolk economy.	Add reference to agriculture in Norfolk economy in economy section.

HOUSING COMMENTS

Response I	Organisation	Answer	Officer Response	Action
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	There are potentially serious side affects from the proposed 10% buffer in Agreement 16; housing should only be built where the strategic and local plans require them and we must not create situations whereby developers are allowed to build house where it's the easiest, sell well and are the most profitable. The real evidence shows that under delivery isn't being caused by the shortage of permitted sites; to that extent the 5 year land supply and under delivery criteria is allowing developers to build where they want to and thus strategic and local plans are being negated and over ridden. I don't support the use of a buffer and certainly not at 10%. Efforts should be directed to ensure developers only build on sites within local plans.	The points raised are noted but under delivery of planned developments requires a range of interventions. National guidance requires that plans should plan positively to meet needs and be sufficiently flexible to minimise risks associated with under delivery. The Agreement makes clear that buffers are not to be treated as part of the housing target for five year land supply purposes. The planning authorities will need to keep this issue under review and take account of any revisions to the calculation of OAN which are currently being consulted on by government. In some parts of the County where the proposed methodology would result in significant affordability uplifts further delivery buffers may not be justified	Add further text to the NSF indicating that the need for buffers will be subject to further review following the results of the current consultation on new approaches to establishing OAN.
BHLF-3C85-CAE4-Z	North Norfolk District Council	Agreements 10 -17 – That a formal decision to commit to providing a 10% buffer on housing targets should not be made until such time as the implications of the proposed revisions to the establishment of Objectively Assessed Housing Needs are clear.	The points raised are noted but under delivery of planned developments requires a range of interventions. National guidance requires that plans should plan positively to meet needs and be sufficiently flexible to minimise risks associated with under delivery. The suggested 10% buffer in Agreement 16 is considered to be an appropriate response. The Agreement makes clear that buffers are not to be treated as part of the housing target for five year land supply purposes. The planning authorities will need to keep this issue under review and take account of any revisions to the calculation of OAN which are currently being consulted on by government. In some parts of the County where the proposed methodology would result in significant affordability uplifts further delivery buffers may not be justified	Add further text to the NSF indicating that the need for buffers will be subject to further review following the results of the current consultation on new approaches to establishing OAN.
ANON-3C85-CAXS-J	Resident	There must be a strategy to bring more affordable housing onto the market. Developers are too easily able to get round the provision of these in small and medium size developments.	Agreed. Agreement 10 commits the Authorities to providing for all needs including for affordable homes. However it would be helpful to add reference to affordable homes after Agreement 14 which could also usefully make reference to the housing needs of the armed forces and self build. The specific approaches to provision including targets, site size thresholds and consideration of viability are matters best dealt with in individual Local Plans.	Amend text after Agreement 14 to include reference to affordable homes, self build and armed forces accommodation.
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 6.4 - this is the most challenging. The need for 26% of the total future housing requirement to be affordable is higher than that which is aimed for in West Norfolk at present where even at 20 % is not achieved. The increase in the number of beds in care homes from 9921 to 17949 by 2036 will have to be accompanied by a similar increase in the number of carers who will require training and accommodation at prices that they can afford. Para 6.5 Much of West Norfolk is constrained because of flood risk. It is time to re-assess the costs and benefits of a Wash Barrier to protect the Fens and the high quality agricultural land from flooding. It may well be less expensive than improving the flood defences all around the perimeter of The Wash as well as up the tidal estuaries. In addition a Wash Barrier could generate significant green electricity from the tidal energy that is secure and predictable. Naturally such a barrier would have an impact on the environment some of which would be harmful but other changes would be beneficial.	The need for affordable homes and specialist accommodation for the elderly are evidence based and must be addressed. This will be a significant challenge in some areas but it is nevertheless important that the framework commits the authorities to prepare local plan which address these issues.	No change to NSF
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	Can more be done to accelerate building projects? Larger sites have so many "Planning Conditions" attached which need to be discharged and which must take a huge amount of planning officer time. Many local people forget they benefitted from earlier development, want no change and quote lack of doctors, school spaces, infrastructure as reasons to object and delay much needed projects	Agreement 16 commits the Authorities to a range of measures designed to improve delivery rates and the Authorities are collectively considering what additional measures may be desirable. If further cross boundary agreements are necessary this will be included as part of the on going review of the Framework.	Further delivery based agreements to be considered following completion of the work currently being undertaken by the Delivery Group.
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited understands its integral role in housing delivery for the Central Norfolk Housing Market Area and to meet specific requirements in the existing and emerging Breckland Development Plan. The application for the SUE (up to 4,000 new homes) was submitted in July 2017 and consent is anticipated by spring 2018. Housing development at the SUE will be brought forward in response to the housing market/need. Given the size of the site, the housing delivery will take place over a number of years. It is expected that the first occupations will take place in 2020. At its peak, the indicative housing trajectory suggest up to 200 housing per year may be built. The site is anticipated to be completed by 2044, although this will be dependant up on factors such as the housing market, number of outlets on site etc. Full regard has been given to strategic infrastructure requirements needed to support the development. These will be implemented to align with housing delivery. For instance, the Link Road between London Road and the B1077 Attleborough Road and new footbridge across the railway will be delivered prior to the completion of 1200 dwellings on site (although the road could be delivered sooner if public funding is secured). Other supporting infrastructure such as schools will be delivered at appropriate trigger points. The provisions will be included in the S106 legal agreement that will accompany the SUE consent.	Noted. The issues raised are matters for consideration as part of the Breckland Local Plan	No change to NSF

BHLF-3C85-CACC-D	South Norfolk Council	<p>Housing delivery – chapter 6.6 It is understood that further work is in progress to better enable the councils to understand how they could better enable the quicker delivery of housing on allocated and permitted sites. The measures and options included in this section are therefore sensible, but the Council believes that there could be stronger commitments to assisting in unlocking key housing sites. It has become increasingly apparent that few larger sites are coming forward as quickly as is desirable, and the use of Local Delivery Vehicles to assist in forward-funding infrastructure to de-risk sites is likely to become increasingly important in the next few years. The NSF will need to reflect other emerging information and evidence in this area, such as the enhanced powers of compulsory purchase announced last week by the Government.</p> <p>On a similar matter, several Norfolk councils (including South Norfolk Council) routinely reduce the “standard” implementation periods (from three years to two years) for any permissions which are granted, at least in part, due to a lack of 5-year housing land supply. The Council believes that the NSF would be strengthened if all the authorities committed to do this through an additional Agreement, and that this would help speed up the delivery of such sites.</p>	Noted and Agreed. Further delivery measures are being considered. The recommendation that Agreement 16 is amended to include shorter 2 year implementation conditions for larger scale growth (100 dwellings plus) has been considered but as some authorities are not willing to sign up to this it cannot be included in the NSF.	No change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	Where public funding is available it should be used to help support new development and improve the viability of strategic development schemes which generally require considerable upfront investment in infrastructure before substantial housing growth can be delivered.	Noted and agreed	No change to NSF
BHLF-3C85-CA6A-X	BA	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?	Noted	Add revised text above table - The total OAN in the Broads Authority Executive Area between 2015 and 2036 is 286 dwellings (approx. 14 per year). In the Central Norfolk SHMA these figures are broken down between the overlapping Districts as follows:
ANON-3C85-CA62-F	Resident	<p>How will building more houses contribute to "reducing the demand for and use of water and other natural resources"?</p> <p>We can reduce the need to build new houses by taking measures to restrict ownership of multiple houses, especially where these are empty for much of the year. There should be financial penalties for people who own houses that are empty for the majority of the time.</p>	Reducing the demand for water and other natural resources is intended to be delivered through the construction of more efficient homes incorporating specific measures to 'minimise' water use. A new agreement to adopt a common water efficiency standard should be added to the framework. The use of a property as a second home does not require planning permissions and is a matter outside of the control of planning departments.	No further change to NSF
ANON-3C85-CA6C-Z	EA	we acknowledge the need to increase development in Norfolk and the 12.7% projected increase in population of the county. This will have environmental impacts, these could include increased flood risk, pollution, stress on water resources and quality and loss of habitats. We are willing to work with councils to address these issues	Noted and welcome the support	No change to NSF
ANON-3C85-CA87-P	Resident	<p>The continued drive to provide more housing come what may is directly opposed to the desired aim to be caring of the Environment in section 7. This coupled with a lack of infrastructure and an acknowledged underdevelopment of this, IF ANY just adds to the Environmental burden. A new home owner in more rural locations has to drive to shop, get to school on poorly maintained roads.</p> <p>A lot of modern estates are clearly unsustainable even though they pretend not to be so and the desire for LA's to get any income, which includes the News Home initiative BUNG and rate revenue means that are complicit with the rape of the countryside</p>	Planning authorities are required to prepare plans which positively provide for development needs	No change to NSF
ANON-3C85-CA8T-K	Hockering Parish Council	<p>Hockering has been severely blighted by unsuitable housing developments approved due to the supposedly lack of a 5-year land supply. This is destroying our rural nature and causing damage to ancient hedges and green fields.</p> <p>Consideration has not been given to an overall view of the cost to the village of all these developments. Councils need to see each development in the light of what has gone before - not as an individual application. The approving of a number of developments without regard for what is already being built has led to a dangerous situation with regard to the main highway - Heath Road. This is all due to councils omitting to view the area as a whole and in not looking carefully at the area that they are blighting.</p> <p>This is of serious concern to all parishioners. Every application has been objected to by the parish but these views have not been upheld.</p>	Matter for local plans to address	No change to NSF

ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	<p>1 Government has said that the housing market is broken and that it intends to fix it. We await its plans. It is welcome that the NSF commits local authorities to apply greater 'science' to the manner in which housing need is assessed and provided for.</p> <p>2 The problem lies with a combination of the volume of houses being built and the way the 'affordable housing' market. Building more homes is essential and there is a considerable volume of new housing stock in the early stages of planning in West Norfolk.</p> <p>3 This focuses the issue to the way affordable housing is defined and provided for. The population forecasts (section 4) indicate what will be a growing shortage of working aged people in West Norfolk over the 20 year plan period, whilst the demand for labour will inevitably increase. Whilst post-Brexit the agricultural industry will become more capital and less labour intensive (that is already starting to happen) care for the elderly and provision of services for the tourist industry need labour, and are both low paid sectors. West Norfolk will therefore continue as a low pay economy and it is essential that housing provision clearly takes the particular needs of this area into account. The NSF requires some rebalancing of wording in this respect.</p> <p>4 The fact that West Norfolk's working population will be increasingly low waged has implications for the service and retail sectors. That does not mean, however, they do not aspire to the same things as higher paid workers, and that includes owning their own home. A sufficient stock of decent, modern, affordable housing is therefore essential but and the NSF must address this. However it must also address, but does not, interventions in the housing market to ensure that affordable houses are not simply snapped up by wealthier people (especially whilst interest rates remain at a historic long term low) and therefore perpetuate the shortcomings of the rental market.</p>	Noted and Agreed. Explanatory text of draft 6.4 already notes the significance of affordable housing issues and the scale of the challenge faced county wide. Comments made are largely accepted and it is considered that these are best addressed by further text being introduced into this section stressing the importance to the economy of maintaining a good supply of affordable homes for those of working age.	Further text introduced into this section stressing the importance to the economy of maintaining a good supply of affordable homes for those of working age
BHLF-3C85-CA3J4	The Somerleyton Estate	<p>Comments about Section 6 – Housing</p> <p>In Section 6.4 'Type of Homes' a range of home types are set out to provide 'critical' guidance on tenure across the Norfolk local authorities. The Somerleyton Estate believe that a key type of home, being picked up by many local planning authorities elsewhere in the country (Tendring, Staffordshire and Stevenage to name a few), is aspirational housing. Described in the emerging Tendring local plan currently as (our emphasis):</p> <p>"Extensive public consultation has indicated that local people would support the development of 'Aspirational Housing' i.e. homes that are more spacious, with larger gardens, more vegetation and more parking space than most of the new homes that have been built in recent years. National housing density restrictions over the last 15 years prevented many properties of this nature being built; however, the new National Planning Policy Framework allows more flexibility for Councils to support housing developments of a size and type that better reflects local characteristics and the economic priorities of the Council.</p> <p>Being a district that is predominantly rural in character, lower density housing development is generally more in keeping with the fabric of Tendring's towns and villages. In addition, the Council's Strategic Housing Market Assessment suggests that around one fifth of the demand for housing for purchase on the open market is for larger dwellings of 4 or more bedrooms and that the proportion of larger properties in the higher Council Tax bands in Tendring is much lower than the regional average.</p> <p>The strategic priorities of this Local Plan focus heavily on the need to deliver economic growth, tackle unemployment and deprivation and improve the long-term prospects of future generations. Alongside measures to attract businesses, rejuvenate town centres and create more jobs, delivering the right mix of housing is critical to achieve all of these objectives. By delivering a high proportion of 'Aspirational Housing' within the mix of new homes over the 10-year plan period, the district can go some way to reversing the economic decline of the last 40 years by:</p> <ul style="list-style-type: none"> • Providing attractive high-quality homes that ambitious young people growing up in our area can aspire to live in and stay close to their family and enjoy high quality employment without feeling they have to move away from the area to reach their full potential; • Encouraging high-earners and people with entrepreneurial spirit to live in the district who will have disposable income to spend in the local economy and who have the potential to invest in local business opportunities; • Reversing the unfair perception amongst some people and businesses that Tendring is simply a retirement area, which has been a barrier to business investment; and • Increasing the value of existing property in the district to the benefit of local residents and their children and, over time, reducing the rate of unsustainable inward migration that has resulted in part from cheaper property prices in the district's coastal towns and from growth in the 	Space standards are a local plan issue - each authority to decide if they wish to adopt standards.	No change to NSF
ANON-3C85-CA6Q-E	Resident	observation; The "agreement 14" is key to ensuring the housing needs are met.	Noted	No change to NSF

<p>ANON-3C85-CA61-E</p>	<p>Define Planning & Design Ltd</p>	<p>As noted from Section 3, the HMA boundaries do not reflect the travel to work areas and therefore cross boundary influences should be taken into account. Given the emphasis of the framework on managing the supply of housing to match employment growth, the TTWA relationship is significant to the distribution of housing currently and likely to continue to be in future.</p> <p>The strategic objective to ensure a sustainable pattern of development by integrating homes, jobs and other key day-to-day services is fully supported and is reflected in the historic and future role of market towns within a rural hinterland. The delivery of associated infrastructure is critical to this approach. In order to unlock development, Local Authorities must be required to support the delivery of road, technology and green infrastructure in growth locations, and should seek to maximise the potential use of funding sources such as the Housing Infrastructure Fund.</p> <p>In terms of addressing housing needs, whilst it is agreed that the County must provide for an appropriate mix of housetypes and tenures to meet the full identified need for new homes, a flexible approach needs to be taken by Local Authorities to ensure that potential changes in demand for housing due to employment growth can be readily accounted for. The NPPF also highlights that demand as well as need must be considered in the determination of an appropriate housing mix.</p> <p>As reflected in response to Section 4, the availability and suitability of land to support strategic housing development at Fakenham, proposes that the town and North Norfolk District will play a significant role in meeting the growth aspirations for the County.</p>	<p>The definition of Housing Market area is a matter addressed in the Strategic Housing Market Assessments which cover Norfolk which take into account and explain the significance of Travel to work areas and the relationship between housing and employment.</p>	<p>No change to NSF</p>
<p>ANON-3C85-CA3Y-K</p>	<p>Lanpro Services Ltd</p>	<p>We support the core objectives set out in the Framework, but recommend that a strategic approach is taken to meeting these requirements. The requirement of 4,000 homes per annum between 2015 and 2036 is not easy to attain and already the Councils have fallen behind this requirement, leading to an increase to 4,900 per annum. Although the Framework appears confident that rates will increase to the required levels, there is little evidence to support this. It is also likely that a range of previously developed sites, although welcomed from a sequential analysis perspective, will bring forward difficult to develop sites. These may include contaminated areas, they may raise difficulties over different ownership and lease covenants, and are often in awkward locations. Therefore, many of these sites do not come forward as first choice development opportunities. In addition, these locations are often more expensive to build and cannot meet the desperately needed affordable housing provision. This problem will be exacerbated by the desire (which we support) to provide homes, which are of enhanced construction standards beyond the current Building Regulations to meet the legitimate needs of high energy efficiency, low carbon dependency and more frugal water usage. These requirements will further add to build costs on some sites which are already difficult to build on.</p> <p>Stating that there are consented sites is simply not sufficient, as consented schemes do not guarantee delivery as shown by existing housing completions and a growing affordable housing need. We are also aware of the critique by CPRE Norfolk of the disputes over housing needs and allocations where many of the points we make here are not being adequately considered.</p> <p>This continued failure against need and targets, will lead to an increasing affordability gap, as supply continues to dwindle. Yet housing demand will continue to grow, driven by the main economic centres and by the migration set out in the Framework. This will continue to impact adversely on local economies, particularly through a lack good quality accommodation for key local business, including agriculture. We note that the Framework recognises both the affordability gap along with a growing deficit in housing for specialist care and for older people. This creates a picture of under provision against targets with the two most vulnerable sectors of the community (the poor and the old) not having their needs met. Long term continuation of these inadequacies of unmet but burgeoning need can be harmful, particularly as older people are attracted to the County and many of our own young people would like to stay here also.</p> <p>This under provision and the weaknesses in the current approach has led the Framework to recommend an increase of housing provision to a buffer of 10% of OAN. This is allied with a requirement to allocate a range of sites, which will deliver sustainable development. It then refers to greater support for infrastructure to help delivery and be attractive to housebuilders. It states that there should be clear demonstration that such development can be delivered. The Framework refers to housing needs support being directed to urban extensions.</p>	<p>There is no evidence to suggest that a new garden village/town will be required in the County to deliver the required growth or that such a proposal would deliver sustainable development.</p>	<p>No change to NSF</p>

<p>ANON-3C85-CA3Y-K</p>	<p>Lanpro Services Ltd</p>	<p>It is our view that there is a danger of not dealing with the fundamental issues which provide the barriers to housing choices. Urban expansions, rural sites and previously developed land must play a role in meeting recognisable and commonly agreed housing requirements. Urban extensions, in the correct circumstances, can have a positive impact on existing communities through providing new green spaces funding environmental improvements, delivering new road infrastructure to ease congestion, sustaining services, facilities, wider community infrastructure and supporting business. However, in other circumstances, they can create poor and environmentally inappropriate development, which encourages the speculative house building model and provides a housing estate 'bolt on' approach, with homes located some way from central areas. We have already highlighted unsuitable issues that can arise with cramming new homes onto previously developed land. This is why we now advocate a planned new garden town as part of a strategic approach to housing delivery and economic growth within Norfolk. As advised previously this will provide greater certainty of delivery at the right time in the right places, and offering real options for community betterment.</p> <p>The benefits of adding a new community based on garden community principles can be summarised as:</p> <ul style="list-style-type: none"> • A strategic County-wide approach can be taken; • A sequential site analysis can ensure that maximum benefit is derived from site selection, in terms of linkages with surrounding towns and villages, public transport and highway networks and existing business clusters; • The strategic site selection process will ensure that a site is chosen that has minimal impact on the surrounding landscape and local community; • It will facilitate a master planned approach to ensure that the development has a positive relationship with its surrounding context; • A site can be selected that will have minimal negative impact on local communities. • A quantum of development can be provided, which will offer higher levels of affordable housing, specialist and elderly housing, as part of a comprehensive approach to creating a new community; • Garden community principles can be applied, to provide land value capture, long term stewardship and collective community governance models, by way of a community trust, along the same lines as the original garden cities; • The evolution, design and governance can be undertaken by way of a community governance model; and • Either by way of a Garden Community Development Corporation or partnership/collaboration between local authorities and a community trust or lead developer, land can be secured, a business plan agreed and certainty of delivery of development, including infrastructure to both serve the site and surrounding context; and • A commitment to a mix of housing types which allows for low density and moderate density living where people of different incomes ages, 	<p>See above</p>	<p>No change to NSF</p>
<p>ANON-3C85-CA3Z-M</p>	<p>BUILDING GROWTH Place Land & Markets Group</p>	<p>delivering high quality, energy efficient homes in attractive living environments which make a positive contribution to the health and well-being of communities (insert) 'and support Norfolk's place competitiveness'.</p> <p>6.1 states that in most districts delivery rates have fallen behind the plan targets.</p> <p>The PL&M Group propose that there is an urgent need for the reasons for the mismatch between numbers planned for an delivery to be investigated. Unless the causes of the planning permission overhang are properly diagnosed it is difficult to plan the next round of development in full knowledge of true supply/demand and the capacity of the housing market to deliver. The PL&M Group look forward to working with the Norfolk authorities to fully interrogate the causes of the permission overhang and under-delivery against housing targets. Equally, there is a need to evaluate why key strategic sites have not come forward and what aspects of the delivery model can be adapted to support volumes of delivery and a higher quality product - in line with the aims set out at the start of this document.</p> <p>If there is shown that the targets set represent an inflation of true demand, It should be made clear to DCLG that the pursuit of over ambitious housing targets is opening the County up to litigation and challenge leading to the allocation of the wrong homes in the wrong place in contradiction of the fundamental aim of the NPPF.</p> <p>The PL&M Group concur with the statement in the document that annualised targets are a 'blunt instrument'.</p> <p>The PL&M Group would welcome engagement with the NDF to discuss the Strategic Land & Infrastructure Investment Model which it is interrogating as a potential innovative approach to underpin housing market delivery, in terms of number, mixed use and quality. This model could potentially help to produce a more strategic and flexible response to the cycles of property market demand such that serviced and master-planned sites backed by a patient capital investment proposition could be in place to accommodate very substantial future growth - beyond the 5 year land supply and annual targets - with housing delivery rising to meet the demands of a given market in a given year.</p> <p>Collectively, the Authorities are committed to the delivery of energy efficient homes which minimise the inefficient use of scarce resources and each Local Plan will consider the desirability of requiring enhanced construction standards which go beyond the requirements of the current National Building Regulations. - this para is insufficient in its approach to promoting sustainable development in its focus on a fabric based approach. It is fundamental to achieving sustainable forms of development that the footprinting of settlement is made more efficient through the insistence by planning authorities on the inclusion of elements of mixed use and mixed tenure, and beneficial co-locations are taken into account - in order to create balanced communities where trip generation to service daily needs is reduced.</p> <p>See points on the older demographic and its occupational needs set out above. A key consideration that needs to be built into planning for</p>	<p>See below</p>	<p>No change to NSF</p>

<p>ANON-3C85-CA3Z-M</p>	<p>BUILDING GROWTH Place Land & Markets Group</p>	<p>The potential to develop extra-care apartments co-located with doctors surgeries eg within an urban block or upper part format should be considered as part of a mixed use neighbourhood proposition within the major urban extension currently being promoted.</p> <p>Building Growth has systematically interrogated barriers met by the industry in developing in Norfolk. the major barrier to delivery was recognised to be the capacity of and provision of infrastructure. The BG PL&M Group have been working with members to fully understand barriers to growth. We look forward to working with the NDF authorities to produce a coordinated and well informed response to supporting innovation in the market, informed by our members market experience. In particular we are interrogating the potential of the Strategic Land and Infrastructure Investment Model (SLiIM) to underpin market innovation to unlock large scale and stalled sites.</p> <p>Greater support with infrastructure planning in relation to large scale plans for urban expansion to increase confidence and reduce risks for the industry and make them more attractive for housebuilders to build out at quicker rates than in the past. (* we would like to discuss the SLiIM proposition in relation to this objective.)</p> <p>Increasing the number of housebuilders active in the Norfolk market (** the SLiIM model would underpin this and would open up the market to smaller scale indigenous housebuilders) and increased use of modular (offsite) (***)the use of offsite construction could prove problematic for Norfolk in a number of ways. First it could produce a product that is not compatible with the county's place competitiveness and could undermine its attractiveness to tourism; it could operate to tie up large amounts of capital which could otherwise grow jobs and skills locally; if this model were to take over from craft production of homes these skills and the flexibility of the local construction market could be quickly lost; if these homes were produced at long distance they will add to rather than decrease our carbon load; if they were produced abroad in low cost economies, this effect would be heightened and our housing supply could become the victim of increasing geo-political instability; there is a poor record of building defect amongst many modular solutions).</p> <p>Action to stimulate the SME's in the construction sector to increase the number of firms capable of building on the scale of sites that typically result in 5-50 dwellings being provided;</p> <p>and</p> <p>☑ Action to stimulate the self and custom build sector considerably</p> <p>Both of these objectives are served by the introduction of the SLiIM model of development.</p>	<p>Agreed that further work is required to understand the reasons for slow delivery and to identify what further interventions might be required to deliver planned growth. This work is on going and will be reflected in on going reviews of the NSF</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CAC8-2</p>	<p>Suffolk County Council</p>	<p>6.3 Housing It is noted that the Norfolk local authorities are intending to deliver at least Objectively Assessed Need, consistent with national planning policy. The local authorities from both counties will have to work with the New Anglia LEP to relate their growth levels to the support that the LEP can give in achieving these targets.</p> <p>6.4 Types of homes There is reference to the quantification of the needs of gypsies and travellers. It is likely that there will be the need to have engagement between some Norfolk and Suffolk districts where such needs overlap.</p> <p>6.6 Delivering Housing Growth This section identifies the need for to increase the number of people entering the construction sector, noting the probable impact of Sizewell C construction in Suffolk. The Suffolk LAs and training sectors recognise the concerns here and are working to provide means by which these impacts can be mitigated. There is a joint approach being developed across Norfolk and Suffolk by way of a Construction Sector Skills Plan, led by the LEP's Building Growth Group</p>	<p>Noted and agreed</p>	<p>No change to NSF</p>

<p>BHLF-3C85-CACM-Q</p>	<p>Savills</p>	<p>Objection is also raised to the conservative approach to housing provision. Although Section 6.1 acknowledges the responsibility to meet both the market demand for new housing and addressing the need for homes, this is not reflected in the Strategic Housing Objectives . It is considered that the quantity of housing growth should include but not be limited to addressing the need identified, and the Council should allow for more flexibility around provision. We therefore suggest the wording for the first bullet within the listed Strategic Housing Objectives (p33) be re-phrased to read: “Providing for the quantity of housing growth which will support necessary to drive the economic prospects of the County and address in full the identified need for new homes.” Section 6.4 – Type of Homes Support is given for the overall objective of Agreement 14 and specific support is expressed to the Council’s reference to student housing and the OAN: “The Central Norfolk Strategic Housing Market Assessment concludes that based on historical trend the student population in and around Norwich is likely to grow by around 420 students per year. The SHMA assumes that this student population will live in dwellings and this need is added to the OAN requirement for new homes”. This approach is considered to be entirely appropriate. Objection is, however, raised in that this approach has not been applied to the growing needs of the elderly and the specialist accommodation they require. It is considered that applying the same approach to provision for the elderly as is applied to the need for student housing (i.e. estimating the additional need and adding this to the OAN), would create a more accurate reflection of the needs for specialist accommodation and increase the likelihood that this will be delivered. We also note that that no reference has been made to the need for ‘service families’ in Agreement 14, despite the number of military bases in Norfolk (e.g. RAF Marham).. Section 6.5 – Capacity and Distribution The standard Norfolk methodology referenced in Agreement 15 has not been attached to the draft document and will, nonetheless, be superseded by the Government’s national methodology for calculating housing need. We would welcome the opportunity to comment on a revised methodology. Section 6.6 – Delivering Housing Growth Support is given to the first bullet point of Agreement 16 (p42), which seeks to bring forward more housing land than the minimum required by the NPPF (the 5% buffer required in NPPF para. 47).</p>	<p>The approach to housing targets is not considered to be conservative. It is an evidence based approach which identifies and seeks to address needs, includes ambitious uplifts for employment in central Norfolk and incorporates delivery buffers. There is no evidence based requirements for further uplifts. Agreements are written as minimum requirements and allow for authorities to respond to Local issues via the preparation of individual Local Plans. The needs of the elderly are included within the OAN assessments and do not require further uplifts. The standard methodology referred to in Agreement 15 relates to housing land capacity studies and is not related to the assessment of housing need which is a separate matter. The authorities consider that a clearer indication in relation to scheme delivery is essential given the delays which have occurred in recent years.</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CACV-Z</p>	<p>Gladman</p>	<p>Agreement 10 - Housing needs and Supply Whilst this consultation does not set out the level of housing needs being proposed as these are to be dealt with through the emerging Local Plans process, Gladman have nonetheless considered the OAN prepared for the Central Norfolk HMA and are concerned that the assessment does not correctly identify a Framework and PPG compliant assessment of housing need. Gladman has commissioned Lichfields to undertake a critique of the HMA’s latest assessment of housing needs (see appendix 1) and believe that this consultation provides the forum to voice these concerns so that the authorities in the HMA can consider this evidence and update its OAN prior to progressing Local Plans based on incorrect assumptions. For brevity, the Lichfield report identifies a number of significant shortcomings. These include:- The failure to evidence that the scale of market signals uplift proposed could be expected to improve affordability. The Lichfield analysis supports the need for a higher uplift, and based on a whole range of approaches concludes that an uplift for the HMA of 25% could be expected to improve affordability. - Failing to include the needs associated with the City Deal within OAN assessment, despite this being an approach that the SHMA previously advocated. - The significant under-estimation of the scale of affordable housing needs by using an approach which does not follow the stages as set out in the PPG, and uses the criteria of housing benefit which is not recognised in either national policy or practice guidance. Accordingly, the assessment fails to appropriately assess all households which are not able to afford market housing. The Central Norfolk SHMA also inherently assumes the continued role of the Private Rented Sector (PRS), an approach which has been rejected by Inspectors and does not fall within the Framework’s definition of affordable housing. The Central Norfolk authorities should consider the contents of the OAN critique and undertake the necessary work to ensure a NPPF/PPG compliant assessment of need is undertaken to inform the housing policies contained in each of the Local Plans currently being progressed. Furthermore, the HMA should consider the implications of the proposed changes to the current methodology for calculating OAN. Whilst the standardised OAN methodology is currently subject to consultation, we consider this will likely have implications on plan preparing across the HMA. Indeed, the methodology (as currently proposed) would appear to generate a housing need figure in excess of the SHMA’s OAN, and the requirement including the City Deal, at just over 3,200 dwellings per annum. Given current plan progression across Central Norfolk, this methodology would likely apply to most authorities if adopted. Agreement 16 – 10% buffer Notwithstanding the comments made on housing needs above, Gladman consider that the proposed buffer equal to not less than 10% of the OAN requirement should be applied is a positive approach to plan making. However, we would question the basis on which the 10% figure has</p>	<p>The representation essentially raises two issues. The first is a criticism of the approach taken towards the preparation of SHMAs which underpin the agreements with the NSF on housing need. As these agreements are based on three separate SHMAs it is considered that this level of detailed technical analysis is considered by each of the groupings which produced the relevant SHMAs and no adjustment should be made to the NSF until this work has been completed. It should also be noted that the publication of the draft standard methodology for calculation OAN may render detailed work in response to this representation unnecessary in some cases. The second issue that the buffer of 10% listed in agreement 16 is inadequate and a higher buffer of 20% should be preferred. This representation cites inspectors recommendations in the cases of Redcar and Cleveland and Stratford upon Avon local plans. Clearly these are only two examples and there is no standard buffer that exists.</p>	<p>Detailed comments on the SHMAs to be sent to relevant authorities for consideration. No change to agreement 16 considered necessary.</p>

<p>BHLF-3C85-CACB-C</p>	<p>Hopkins Homes</p>	<p>Agreement 10 - When determining their respective Local Plan housing targets each authority, working together where desirable, will aim to deliver at least Objectively Assessed Need as identified in the most up to date evidence (Table 8). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.</p> <p>Summary: Hopkins Homes Ltd supports Agreement 10 that each Local Planning Authority should meet at least its own Objectively Assessed Need. However recent evidence and guidance indicates there is a significant housing need in the Greater Norwich Area that the emerging Greater Norwich Local Plan (GNLP) will need to address. The persistent patterns of under delivery in the GNLP area and an over reliance on large strategic allocations in the urban area does not provide a positive framework to plan for future needs. It is suggested that there is an availability of unconstrained land at Wroxham which can assist in meeting this need in a highly sustainable manner and play a complimentary role to the employment growth aspirations of the Greater Norwich Area. The Strategic Framework should therefore include measures to encourage emerging Local Plans to significantly boost housing supply but also recognise the role that settlements near to the main urban areas can play in boosting supply.</p> <p>The evidence base produced in support of the emerging GNLP, demonstrates that there is a significant need to be addressed. The SHMA estimates that the need for the GNLP area is 39,486 in the period 2015-2036 (1,880 dwellings per annum). Taking into account completions (1,782) and commitments (36,522) the Councils feel that new allocations for around 8,900 dwellings are needed. Whilst spatial options are being considered and will form the basis of a forthcoming Regulation 18 consultation, the GNLP Board has estimated that around 4,900 homes might be delivered on new allocations across the GNLP area (including 1,000 homes in towns and key service villages, a tier which includes Wroxham).</p> <p>Evidence suggests that there is significant upward pressure on housing need which the GNLP will need to address beyond the OAN. The following guidance highlights that a more positive framework for the delivery of much needed homes should to be considered to meet the significant needs across all parts of the GNLP area, including in Broadland:</p> <p>☐ The Government's current consultation on further measures set out in the housing white paper to boost housing supply in England¹ suggests a standardised approach to calculating housing needs. The standard methodology for calculating housing needs 'Indicative assessment of housing need based on proposed formula, 2016 to 2026' indicates that the projected need in Broadland is significantly greater than is identified in the Central Norfolk SHMA (summarised in Table 8). This indicates that rather than a need of at least 389 dwellings per annum in Broadland, the annual needs is much greater and is in fact 528 dwellings per annum. Using a plan period to 2036 as agreed through the GNLP and Norfolk Strategic Framework, this would equate to need of 10,560 dwellings in Broadland, therefore significantly above the</p>	<p>Housing distribution a matter for local plans to consider</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CAC2-V</p>	<p>Albanwise Ltd</p>	<p>Agreement 10 - When determining their respective Local Plan housing targets each authority, working together where desirable, will aim to deliver at least Objectively Assessed Need as identified in the most up to date evidence (Table 8). Where this would result in unsustainable development, agreement will be sought with other authorities, initially within the same Housing Market Area, to ensure sufficient homes are provided to meet identified needs and demands in the area until at least 2036.</p> <p>Summary: Albanwise Ltd agrees that each Local Planning Authority should meet its own Objectively Assessed. It is also suggested that there is an availability of unconstrained land at Downham Market which can assist in meeting this need in a highly sustainable manner. The persistent patterns of under delivery in King's Lynn and West Norfolk, and an over reliance on large strategic allocations in the King's Lynn which are environmentally constrained does not provide a positive framework to plan for future needs. It is suggested that there is an availability of unconstrained land at Downham Market which can assist in meeting this need in a highly sustainable manner. The Strategic Framework should therefore include measures to encourage emerging Local Plans to significantly boost housing supply but also recognise the role that settlements such as Downham Market can play in boosting supply.</p> <p>The SMHA update from 2015 identified that to meet the full objectively assessed need (710 dwellings per annum) 14,200 homes will need to be delivered over the period 2016- 2036. This was reviewed in August 2016 and indicated that the need may be nearer 670 dpa or 13,400 homes. The Council is embarking on a Local Plan review to find land for additional homes responding to the latest SMHA evidence.</p> <p>The previous approach in the Core Strategy placed most growth at King's Lynn as the main centre in the Borough to assist in regeneration needs whilst limiting growth at Downham Market, despite identifying it as one of the most sustainable and deliverable locations. The strategy requires fundamental review to recognise the positive role that Downham Market can play in meeting growth needs sustainably.</p> <p>A strategy focussed on King's Lynn should be avoided over risks of deliverability over the full Plan Period due to a number of environmental constraints and concerns about the strength of the housing market. The approach would not accord with the emphasis of NPPF to provide a positive strategy and boost significantly the supply of housing. To ensure that the emerging Local Plan is found sound the Council should focus growth on locations with significant areas of land available free of strategic constraints which can deliver the requisite need, such as Downham Market. The current Local Plan clearly sees this as the most sustainable settlement after King's Lynn.</p> <p>A Spatial Strategy giving greater weighting to Downham Market would be consistent with the call to significantly boost housing delivery as required by paragraph 47 of NPPF and would also prevent development in unsustainable locations as might be delivered through options which encourage a dispersal of development around less sustainable locations. As the second largest settlement in the Borough with available land free of significant constraints, Downham Market has the greatest potential to meet the Borough's development needs and effectively maintain a supply of housing. This will provide a more effective planning policy basis in line with the principles of NPPF rather than</p>	<p>This response essentially raises two issues. The first is that it would be preferable to have a different settlement strategy for west Norfolk that the one currently emerging through the local Plan which paces a greater emphasis on Downham Market rather than King's Lynn in meeting housing needs. This is considered to be a matter for KLWN to address through the local plan and not an issues that should be resolved through the NSF. The second issue is that a 20% buffer should be applied in agreement 16 instead of 10%. There is no standard buffer that exists .</p>	<p>No change to NSF</p>

<p>BHLF-3C85-CACG-H</p>	<p>Persimmon homes</p>	<p>Section 6 - Housing (Agreements 10-17)</p> <p>Persimmon Homes supports the requirement for Local Plans to deliver ‘at least’ Objectively Assessed Need housing numbers (Agreement 10). However comment/judgement on the figures is reserved until the standard OAN methodology has been applied and figures published. The consultation document suggests that should meeting the OAN requirement lead to ‘unsustainable’ development then other authorities would accommodate the need. The intention of this statement is not clear as it does not appear to be a sustainable approach and could lead to increases in the need to travel. If it is accepted that it will be a fine balance weighing up the different aspects of sustainability. Persimmon Homes are generally supportive of the requirement for a proportion of the Broads Authority housing needs to be met with the Broads Authority area with the main housing needs being met in adjacent Districts (Agreements 11-12), although there is still the consideration of increasing the need to travel. Suitable adjacent growth locations should have good connectivity to the Broads Authority area</p> <p>Persimmon Homes supports the aim for Greater Norwich to meet its combined OAN plus an additional 5,228 homes for meet the needs arising from the City Deal (Agreement 13).</p> <p>Persimmon Homes suggests that planning/monitoring for specialist accommodation needs to be separate from non-specialist market/affordable housing; and should not be used to offset targets for market/affordable housing (Agreement 14),</p> <p>Persimmon Homes agrees that wherever possible all Norfolk LPAs should use standard methodologies for housing and employment availability assessments (Agreement 15) but should allow others to comment/critically appraise the methodologies at regular review periods.</p> <p>Persimmon Homes notes the requirement for the quantity of homes to be planned should include a buffer above the OAN requirement (Agreement 16). However, for some Districts, where the housing needs are more acute and not currently being met, this buffer should be nearer 20%. Also, LPAs should take advice from developers on the size of sites that should be allocated. The requirements for larger sites to show evidence of delivery is supported. Persimmon is proud of its track record of delivery, which should be given due consideration alongside technical evidence of a sites suitability. However, the level of evidence required for submission should be proportionate to the stage in the planning process so as not to make the site promotion process unnecessarily costly. Also, such an approach would need to be applied</p>	<p>Agreement 10 and the ‘potential’ for redistribution of growth reflects national guidance which indicates that where unsustainable growth would occur agreement should be reached with neighbouring authorities. The risks of unsustainable commuting would need to be considered as part of this process and would be a matter for each Local Plan to consider should such a scenario arise. It is agreed that the needs of the elderly for specialist types of accommodation need to be separately quantified and planned for. This is reflected in the wording of Agreement 14.</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CA3U-F</p>	<p>TETLOW KING PLANNING</p>	<p>We represent Rentplus, a company providing an innovative affordable housing model that delivers affordably rented homes to buy (a ‘rent to buy’ model) for people who aspire to own their own home, but are currently unable to save for a mortgage deposit.</p> <p>Introduction</p> <p>Enclosed with this consultation response is an Affordable Housing Statement by Tetlow King Planning setting out the details of the rent to buy model which is being delivered in England with support from Government. It describes the model’s compliance with the NPPF definition of affordable housing and how this should be incorporated into local plans to boost supply and meet local housing needs. We ask that this be read alongside our representation so that the Councils approaches to negotiating housing take into account this innovative model which has the capacity to improve delivery and meet high levels of local housing need and aspirations of home ownership across the County.</p> <p>Rentplus is delivering rent to buy housing that meets local peoples’ needs and aspirations in partnership with local planning authorities and Registered Providers (further details of completed and forthcoming schemes can be viewed on their website www.rentplus-uk.com). The rent to buy homes are allocated as with other affordable housing tenures through the local choice based lettings scheme and targeted lettings plans. The Rentplus model provides homes at an affordable rent for those expecting to purchase in 5, 10, 15 or 20 years, with a 10% gifted deposit to assist purchase. The purpose of our representation is to seek more flexible and pragmatic local planning policies to help greater numbers of local families move out of inappropriate housing.</p> <p>It is notable that one recently completed Rentplus scheme was 30% filled by households previously living in social and affordable rented properties, releasing those homes for families in need. Rentplus schemes also enable people to leave expensive private rented sector accommodation and parents’ homes, gaining independence and security of tenure. With such a significant need for affordable home ownership options across the County, it is clear that there is a role for rent to buy housing to play in meeting local need, and also in enabling access to home ownership, a key aim of this Government.</p> <p>We note Agreement 1, which is an important starting point for each of the authorities to consider, and the June 2017 SHMA Update. However, in light of this month’s consultation from the Government on the potential changes to assessing housing need we note that there may be a need in the short term for a review of local housing needs. The Government’s consultation documents suggest there may be a</p>	<p>Noted. Individual authorities will determine tenure types and mixes of affordable homes within their Local Plans.</p>	<p>No change to NSF</p>

<p>BHLF-3C85-CA3U-F</p>	<p>TETLOW KING PLANNING</p>	<p>Agreement 2 is also supported, as it provides a very clear ambition to meet local housing needs. Delivering housing that meets the full spectrum of housing needs requires developments to also reflect differing aspirations, as many people seek to own their own home. The Government's intention for all major developments to be delivered with at least 10% affordable home ownership options will be met not only with the now traditionally accepted intermediate models, but also rent to buy. We note here that our response to the Housing White Paper earlier this year emphasised that rent to buy is not an intermediate model, but a hybrid that requires separate definition, as with a number of the other models set out in that consultation (at Box 4). It is important to note that Alok Sharma, Housing Minister, recently confirmed in the House of Commons that the new definition of affordable housing to be included in the next iteration of the NPPF is to include rent to buy. The SHMA update references the potential changes to the definition of affordable housing, and though this does not directly reference rent to buy, it is right in acknowledging that many potential owner occupiers struggle to save a sufficient mortgage deposit to purchase a home. Rentplus seeks to bridge this gap by providing families with a home that is rented at an affordable level for a set period to enable savings to be built up, before purchasing the home outright.</p> <p>We agree with Agreement 10 as this aims to deliver the objectively assessed needs of each of the individual local planning authority areas; this approach sends a clear message that development should aim to meet local housing needs and properly develop mixed and balanced communities across the County.</p> <p>Noting the statement that the County is aiming to provide suitable homes for those unable to afford market prices and rents, it may be suitable for representatives of Rentplus to meet with strategic planning and housing officers of each of the local councils to discuss how a partnership could assist in this aim. As Rentplus works in partnership with locally active Registered Providers of affordable housing developments are brought forward with considerable local knowledge and experience.</p> <p>We would like to be consulted on further stages of the Framework and other plan publications by each of the Councils, by email only to consultation@tetlow-king.co.uk. Please ensure that Rentplus is retained on the consultation database, with Tetlow King Planning listed as their agents.</p>	<p>Noted. Individual authorities will determine tenure types and mixes of affordable homes within their Local Plans.</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CACV-Z</p>	<p>Gladman</p>	<p>The Duty to Cooperate (DtC) is a legal requirement established through Section 33(A) of the planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross boundary strategic issues through the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of a Local Plan. This matter cannot be rectified through modifications. The Planning Practice Guidance (PPG) provides guidance upon compliance with the DtC which makes clear that local planning authorities should explore all available options of delivering the planning strategy within their own area, and should approach other authorities with whom it would be sensible to seek to work to deliver the planning strategy¹. This should be achieved through co-operation between local planning authorities, county councils and other public bodies to produce effective policies relating to strategic cross boundary matters².</p> <p>Whilst there is no definitive list of actions that constitutes effective cooperation under the duty, cooperation should produce effective policies relating to cross boundary matters and may involve local planning authorities and public bodies entering into agreements on joint approaches, which may involve joint evidence and strategies to define the scope of Local Plans across the Housing Market Area (HMA). It is clear that the Central Norfolk HMA is affected by the influence of a dynamic market area with an emphasis on meeting the HMA's economic growth ambitions. It is therefore important that the authorities contained in the HMA do not lose sight of this objective and that the DtC is a process of ongoing engagement and collaboration and that it is intended to produce effective policies on cross boundary strategic matters³. Accordingly, the Councils will need to continue to engage and work with each other to satisfactorily address any cross boundary strategic issues.</p> <p>Central Norfolk Strategic Framework</p> <p>Any issues of unmet housing need arising from the relevant authorities in the HMA must be fully considered through the preparation of Local Plans, working under the requirements of the DtC. To achieve this, it is vital that this matter is carefully explored through joint working with all local planning authorities within the HMA, together with any other relevant local authorities that the HMA has a clear functional relationship with. Where necessary, a strong policy mechanism will be required within each Local Plan to demonstrate that unmet housing needs arising from any relevant authorities and those with a clear functional relationship will be met during the plan period.</p> <p>The need to tackle any issues of unmet housing need through the plan making process was highlighted in an</p>	<p>Comments are noted which appear to be broadly supportive of the preparation of the framework and the on-going commitment of the authorities to co-operate. The various Agreements (10,11 and 12) provide the framework which will allow for Local Plans to address all needs.</p>	<p>No change to NSF</p>
<p>ANON-3C85-CAX4-K</p>	<p>Parish Council</p>	<p>Successive governments have attempted to meet housing needs by over-allocating land. This has not worked. This Strategy does not address the question HOW those in housing need will get access to housing - it is merely aspirational and will not deal with the problem. Unless Government and local government address this issue housing target are meaningless.</p> <p>Builders will not build houses to stand empty or be sold at a lower price - they cherry pick. "Affordable housing" is not actually affordable to those in most need. Similarly the private rent sector is not affordable. Ample land is committed for immediate needs - the Strategy should examine why it is not being used to provide the housing needed.</p> <p>This Strategy should also analyse housing need in a way that demonstrates what measures, fiscal or otherwise, need to be in place give access to housing of the appropriate type in the appropriate location to meet needs related to social and economic policies. That's real planning!</p>	<p>This point is noted and to some extent reflects a growing recognition from government that the housing market in the county is broken. This has been reflected in the Housing White Paper and more recent government announcements and it is expected that there will be further measures announced to address this in due course. It is recognised that delivery is challenging and that further work has been done collectively to suggest how local authorities may improve the ways they work on this matter. However, the local councils need to work within the current planning system and range of powers they are given by government.</p>	<p>This matter will need to be kept under review in the light of rapidly changing government guidance.</p>

ANON-3C85-CAJG-R	Resident	The proposals fail to recognise that many properties in north Norfolk are no longer affordable for people living and working in north Norfolk. Many properties are empty much of the time. More suitable designed properties are needed for retired people and those only using the properties for holidays/weekends. There is a danger the housing stock will not be adequately maintained as people only use the properties as second homes.	The points made are noted but revised text in the document already addresses the issue of affordable housing and the impact on the economy that may result. In order to control the loss of existing residential stock to the second home or holiday let market local authorities would need further primary legislation to come forward.	Text addressing implications of affordable housing provision to be included. No further change needed.
ANON-3C85-CAJF-Q	Resident	<p>1 It is clear that there has been insufficient building to meet housing need (total numbers and type of accommodation) in recent years and the push to rectify this is welcome and reassuring.</p> <p>2 There is (nationally as well as locally) a failure to recognise that affordable homes are affordable for better-off people too, and that they buy them up to rent and, whilst the house building market has failed, so too has the rental market. Building more affordable homes without proper safeguards as to ownership concentration, therefore, simply adds to the medium to longer term problem. You fail to address this.</p> <p>3 Throughout the narrative there is a failure to take account of the likely impact of Brexit. There is much emphasis on taking account of the particular housing needs of gypsies and travellers but not the needs of Eastern Europeans, working as they often do, in low paid agricultural work, sending large proportions of their earnings home to their families, and being reduced to living in squalid and poor housing. This impacts a much greater number than gypsies yet is swept aside as it is not politically correct to address the issue. That is the greatest failure of this section.</p>	Work jointly commissioned by local authorities has highlighted potential delivery interventions and these are included in section 6 of the updated NSF. It is not possible at this stage to predicted the impacts of Brexit on housing needs and the labour market. Once this picture becomes clearer the NSF can be updated accordingly.	No change to NSF
ANON-3C85-CA3V-G	Resident	<p>There is a tendency to place too much emphasis on large scale housing development. This results in an imbalance in supply - slanted towards flats, medium-sized houses for owner-occupation and housing association units, all in large concentrations. These types of development are very inflexible; and delivery can be very vulnerable to changes in market sentiment.</p> <p>There needs to be more encouragement of, and considered planning for, the conversion (often re-conversion) of redundant retail and other commercial buildings in market towns; there needs to be some modest provision for organic growth in all but the smallest villages - including to allow family and community support networks to survive, reducing the demand for care facilities; and there needs to be more provision of single-storey units (bungalows) suited to retirement.</p> <p>However, the need for the provision of social housing, rather than simply affordable housing, must be recognised. It is not simply that low-paid people cannot afford to buy; many people do not want to buy or are not (for a range of reasons) well-equipped to deal with the responsibilities of home ownership. these are not people needing to be in formally sheltered accommodation. But they are people who need to be able to rent decent homes, securely (so for their lifetime if they so wish) and from landlords driven by the recognition of their personal and social needs rather than simply a requirement to balance the books or secure a profit. And whilst we do not need ghettos, I feel we have now gone too far in the other direction, denying those who do not aspire to home ownership and the climbing of the greasy pole, the opportunity to live in social groupings with like-minded neighbours.</p> <p>We need, as part of an overall housing strategy, a robust policy for the delivery of socila housing.</p>	These points are noted and this is addressed further in the delivery work highlighted in the updated section 6 of the NSF.	No change to NSF
BHLF-3C85-CA32-C	Norfolk County Council	<p>A belated thank you for adding the Armed Forces Covenant to the NSPG agenda – it was a useful discussion and raised awareness of forthcoming housing issues particularly in the west of the county (which King’s Lynn were unaware of). There were mixed views on whether or not service family accommodation should receive a specific mention in Local Plans. Breckland said there were aware Robertson Barracks at Swanton Morley is marked for closure in 2031 and had not yet mentioned it in any documents. Others thought service families were included in the general population as part of the SHMA and did not need identifying as any different.</p> <p>Going forward, I think it would be helpful and set a good example (nationally) if the Norfolk Strategic Framework and District Local Plans made mention of the armed forces and the fact the MOD’s plans to alter how it provides service family accommodation will impact on residents in Norfolk.</p>	Agreed. Text after Agreement 14 to include reference to armed forces.	Amend text after Agreement 14 to include reference to affordable homes, self build and armed forces accommodation.

<p>BHLF-3C85-CAC1-U</p>	<p>Home Builders Federation</p>	<p>Housing needs and supply Whilst we cannot comment on the level of housing needs being proposed as these still have to be tested at examination we welcome the agreement that each local authority in Norfolk will seek to meet their own objectively assessed needs for housing, as required by national policy. However, should any authority not be able to meet its housing needs the strategy does not set out the mechanisms as to how needs will be apportioned between authorities. There should be a clear mechanism within strategy, that could be set out in each local plan, as to how unmet needs will be apportioned should any Council not be able to meet their own needs. We would also suggest that the statement in paragraph 6.3 that each Local Plan prepared in Norfolk will need to show how the OAN for each Housing Market Area is being met is reflected in "Agreement 10".</p> <p>With regard to the supply of new homes the strategy states that each authority will produce a Land Availability Assessments to the standard Norfolk methodology. We would suggest that it would be more appropriate to prepare a single assessment for each Housing Market Area. This would not only be more transparent but ensure that the sustainability of the distribution of housing supply is considered across the HMA not on an authority by authority basis.</p> <p>Planning to deliver at least 10% over their OAN and allocate a range of different sized sites are further steps in the right direction and will support Council's in having a more robust land supply. However, we would suggest that part 2 of Agreement 16 is expanded so that Council's agree to allocate a minimum proportion of small sites that will support small and medium sized developers. Providing greater certainty for this sector of the house building industry is key to stimulating the growth of such house builders and we would suggest that consideration be given to the recommendations set out in "Reversing the decline in Small House Builders" published by the HBF earlier this year. Alongside allocating more small sites Councils could consider how they could speed up decision making and reduce documentation in order to reduce the costly delays that are a regular occurrence across the Country.</p> <p>Student housing Whilst we agree that there is a need to plan for the needs of students we consider essential that these needs are monitored separately to housing delivery and that this</p>	<p>Current evidence indicates that outside of the Greater Norwich area each authority will address its needs via the preparation of Local Plans and no further agreement in relation to the distribution of development will be required. This issue will be kept under review. The use of a standard methodology to assess land supply allows for supply to be considered at Housing Market Area level. As Local Plans are prepared to administrative boundaries it is important that land supply assessment adopt the same geography. The size of sites to be allocated and delivery/monitoring of student accommodation are matters best considered via the preparation of Local Plans.</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CA3W-H</p>	<p>Hoveton Parish Council</p>	<p>As noted above, the economic benefits of villages such as Hoveton include their contribution to quality of life. While there might be a strong desire to increase development to the North and East of Norwich, Hoveton Parish Council believes that any such development should be sustainable, and should not have an adverse effect on the quality of life offered by the local community in which the new development is to be located. It therefore applauds the shared objective to ensure that "new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure".</p> <p>Unfortunately, Hoveton Parish Council feels that, at present, the general local infrastructure is well below expected standards (please see the Council's comments on Section 7 for further information) and it shares the concerns of local residents that a growing population caused by overdevelopment will seriously impact on residents' access to quality health care, education, and many other vital services, thereby impacting on the quality of life offered within the local community. Furthermore, it seems inevitable that too much development will seriously harm the rural character of the local area. Hoveton Parish Council feels the fragile coastal, Broads and rural environment must be retained if it is to contribute to a strong and valuable tourist industry.</p>	<p>The NSF does not seek to determine the location of growth. The matters raised are issues which will be considered as part of the preparation of North Norfolk's Local Plan.</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CA3K-N</p>	<p>Hoveton Parish Council</p>	<p>As noted above, the economic benefits of villages such as Hoveton include their contribution to quality of life. While there might be a strong desire to increase development to the North and East of Norwich, Hoveton Parish Council believes that any such development should be sustainable, and should not have an adverse effect on the quality of life offered by the local community in which the new development is to be located. It therefore applauds the shared objective to ensure that "new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure".</p> <p>Unfortunately, Hoveton Parish Council feels that, at present, the general local infrastructure is well below expected standards (please see the Council's comments on Section 7 for further information) and it shares the concerns of local residents that a growing population caused by overdevelopment will seriously impact on residents' access to quality health care, education, and many other vital services, thereby impacting on the quality of life offered within the local community. Furthermore, it seems inevitable that too much development will seriously harm the rural character of the local area. Hoveton Parish Council feels the fragile coastal, Broads and rural environment must be retained if it is to contribute to a strong and valuable tourist industry.</p>	<p>Noted, housing distribution is a matter for local plans to consider</p>	<p>No change to NSF</p>

BHLF-3C85-CA7-1	Amstel Group Corp	<p>The need to provide new homes is a key issue facing the area and indeed the country more widely, as the Government seeks to boost significantly the supply of housing. An appropriate balance needs to be struck between the need to provide new homes and other competing objectives, e.g. environmental considerations, heritage etc. The public benefit that new housing provides should be given great weight in decision making to reflect the importance of this need.</p> <p>On Thursday 14 September, the DCLG published its 'Planning for the right homes in the right places' consultation document. The consultation seeks to achieve a standardised methodology for assessing housing need. It suggests a three-step process to assessing housing need. As with existing practice, the DCLG's household projections continue to be the starting point for assessing housing need. The second step involves an adjustment to take account of market signals. This adjustment is based on the affordability ratio between average house prices and average earnings, with a higher adjustment applied in areas with more acute affordability issues. (The proposed approach does not factor in jobs growth.)</p> <p>Finally, the model introduces a cap to limit any adjustment uplift. The cap would be 40% in areas with an up to date (post-NPPF) Local Plan. In areas with Plans older than five years, the uplift is capped at 40% above the projections or pre-NPPF requirement, whichever is higher. Alongside the consultation, DCLG published an indicative assessment of housing need 2016-2026, based on the proposed methodology. For North Norfolk, indicative data suggests the OAN would be 511 dwellings per annum. This is significantly higher than the 409 dwellings per annum that the latest SHMA (2017) suggests.</p> <p>We would expect the Framework and the Local Plans that fall under its remit to adopt and endorse the Government's approach to calculating OAN. The Framework should also recognise that its authorities should endeavour to not only meet, but exceed, housing targets. The OAN represents the minimum level that housing that needs to be delivered.</p>	Noted	No change to NSF
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	<p>Housing: Ashmanhaugh Parish Council engaged with NNDC on a suitable housing model for the Parish and has been very pleased with the subsequent housing allocation. The Council would like to recommend that NNDC's consultation approach is considered when implementing one methodology across the County.</p> <p>The message from the community of Ashmanhaugh was that people want to see a vibrant, growing village and there is an appetite for Ashmanhaugh to grow by about 10% in the next 20 years. This needs to be linear housing - filling in existing gaps in the road frontage with individual properties and within the existing 30mph zone of the Village. There should be some affordable housing available to buy, with priority for local families.</p>	Noted.	No change to NSF
ANON-3C85-CAFT-1	Resident	It would be interesting to know how this sits with the localism act and the additional planning regs afforded to areas with a local plan themselves, especially where parish councils exist.	Can't respond to this point without knowing which part of the draft NSF the point relates to specifically	No change to NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	Use existing planning permission before issuing new ones	Noted and agreed. The authorities are considering what further measures may be appropriate to bring forward consented developments.	No change to NSF
BHLF-3C85-CA6K-8	Hunstanton & District Civic Society	<p>I would wish to add under Section 6 Housing - That there is a major problem with the numbers of houses that have become second homes or holiday lets particularly along the coast of North Norfolk and also in West Norfolk. I suspect the same is the case in the Broads area. Many of the houses are shut up during the winter and the area becomes lifeless. This affects community life, the viability of schools, local shops and transport services. Second home ownership drives up house prices and precludes purchase by local people. There is a large deficit of 20 to 38 year olds from the area, they move out perhaps to go to further education, for employment opportunities or maybe to obtain accommodation that they can afford.</p> <p>Developers are targeting the second home market with large expensive houses that are not what is required by local people.</p>	Noted. Planning authorities have no control over the occupation of existing dwellings as second homes. Individual Council can consider how new housing stock is occupied as part of their Local Plan preparation	Added text around controlling second homes
BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	<p>The NSF echoes national policy objectives to ensure that sufficient homes of the right type, are built in the right location, noting that this means meeting the market demand for new housing, addressing housing need and also that homes which are built should be of the right type - having regard to needs of the existing and future population.</p> <p>Nowhere is there any mention of the north coast problems associated with the growth in second homes (second homes now outnumber principal homes in Holme and neighbouring villages in West Norfolk ie they represent >50% of the stock), the loss of modest dwellings to much grander replacement second homes and the impact on market prices. The related community problems are growing (affordability for resident buyers, empty / uncomfortable spaces for many months of the year, diminishing opportunities for down-sizers in their own villages, retirees wishing to buy into the market and reducing numbers of resident households). Surely this should be an issue for the NSF?</p>	Noted. Planning authorities have no control over the occupation of existing dwellings as second homes. Individual Council can consider how new housing stock is occupied as part of their Local Plan preparation	Added text around controlling second homes

<p>BHLF-3C85-CA3B-V</p>	<p>MP</p>	<p>I am writing in order to comment on the consultation draft of the Norfolk Strategic Framework, which has been prepared in order to improve outcomes for Norfolk and, by agreeing shared objectives, inform the preparation of future local plans. I welcome the wide-ranging nature of the framework, which rightly focuses on infrastructure, housing and strategic economic development across Norfolk.</p> <p>However, I am concerned to note that this draft document makes only the most perfunctory mention of self-build and custom housebuilding, and seems to regard self-build as a type of dwelling rather than a mechanism for delivery at scale – which it is. The Self-Build and Custom Housebuilding Act 2015, as amended by the Housing and Planning Act 2016, places a legal requirement on Norfolk’s local planning authorities to keep a Register of demand for serviced plots from people both and to then meet that demand by consenting planning applications for serviced plots. Furthermore, all Norfolk’s local authorities and public bodies must have regard to these Registers when carrying out their planning, housing, land disposal and/or regeneration functions. These legal requirements are known as the Right to Build and apply, partly or wholly, to all relevant local authorities and public bodies in England.</p> <p>I would therefore like to see the Framework embed good practice in regard to the Right to Build, alongside an agreement between public bodies and local planning authorities to ensure that the discharge of the four functions listed above (planning, housing, land disposal and regeneration) has regard to the Registers, especially in terms of any land held by Norfolk’s public bodies and Norfolk County Council. The Right to Build Task Force, which is part of the National Custom and Self-Build Association (NaCSBA) advises local authorities in these areas and I would be pleased to arrange an introduction in my capacity as Ambassador for the Task Force.</p>	<p>NSF identifies that further work is needed around self-build. Agree, reference to self build to be added to NSF</p>	<p>Amend text after Agreement 14 to include reference to affordable homes, self build and armed forces accommodation.</p>
<p>ANON-3C85-CAXT-K</p>	<p>Woods Hardwick Planning Ltd</p>	<p>We would reinforce the requirement for the respective local plans to address historic shortfalls in the preparation of new plans so that previous and future housing needs are fully met.</p> <p>We support the wording of Agreement 10 which states that the aim will be to deliver at least the OAN figure identified for the respective authority.</p> <p>The plan acknowledges that there has been an under delivery of housing in recent years with the result being that the authorities are experiencing problems in maintaining a 5-year housing land supply as required by the NPPF. It is pleasing to note that the Norfolk Authorities have agreed to take a range of actions to improve housing delivery.</p> <p>The proposals within Agreement 16 are supported. The additional minimum 10% buffer over and above the OAN figure will build in flexibility to the supply to mitigate against some site not coming forward. Furthermore, the allocation of a range of sites is considered essential. Too much reliance can be placed on large strategic sites which take time to deliver and the allocation of small to medium sized sites is essential to maintain consistent delivery. Such sites are easier to bring forward.</p>	<p>Noted</p>	<p>No change to NSF</p>
<p>BHLF-3C85-CA3U-F</p>	<p>TETLOW KING PLANNING</p>	<p>We agree with Agreement 10 as this aims to deliver the objectively assessed needs of each of the individual local planning authority areas; this approach sends a clear message that development should aim to meet local housing needs and properly develop mixed and balanced communities across the County.</p> <p>Noting the statement that the County is aiming to provide suitable homes for those unable to afford market prices and rents, it may be suitable for representatives of Rentplus to meet with strategic planning and housing officers of each of the local councils to discuss how a partnership could assist in this aim. As Rentplus works in partnership with locally active Registered Providers of affordable housing developments are brought forward with considerable local knowledge and experience.</p>	<p>Noted</p>	<p>No change to NSF</p>

INFRASTRUCTURE COMMENTS:

Response ID	Organisation	Comment	Officer Response	Action
BHLF-3C85-CA6A-X	Broads Authority	Agreement 17. There could be landscape impacts of such infrastructure which will need to be considered in protected areas of the County.	Agreed there could be landscaping issues in protected areas	Agreement 17 updated
BHLF-3C85-CA3J-4	The Somerleyton Estate	At the end of this section and under the sub-heading 'Agreement 20' the Somerleyton Estate request the following amendment to make the objective wider in its reach and to avoid a focus only on certain areas of the County at the expense of other key areas such as Fritton Lake: "Agreement 20: In recognition of: a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty Norfolk's natural environment brings to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; and b) the pressure that development in Norfolk could place on these assets the Local Planning Authorities will work together to produce a GI Strategy for Norfolk by the end of 2017 which will aid Local Plans in protecting and where appropriate enhancing the relevant assets."	The same point was raised by Natural England and their wording has been used.	No further change to NSF
BHLF-3C85-CA6A-X	Broads Authority	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?	This is part of the normal local plan process and doesn't need referring to specifically within the NSF	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	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	Agree, aim to strengthen ecological connections between habitats added to agreement	Agreement 20 updated
BHLF-3C85-CAE4-Z	North Norfolk District Council	Agreement 18-20: Agreed	Support noted	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	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.	Agree to change	Add foot note, GI includes 'blue infrastructure' ie water environment - rivers, lakes, ponds etc.
BHLF-3C85-CA6D-1	Middleton Parish Council	The Council did note that a lot of the reports within the document appear to have been created before Brexit was agreed, therefore, the Council would like to see consideration given to the Brexit decision on the long term growth and development of Norfolk within the Framework.	It is not possible at this stage to predicted the impacts of Brexit on infrastructure provision.	No change to NSF
ANON-3C85-CAXS-J	Resident	Without fast broadband and higher mobile standards away from Norwich development and attracting a wide range of businesses and residents will not be achieved.	The NSF recognises how essential fast broadband is and will help to promote this further	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 7.5 - although Broadband availability and speed has improved, the patchy reception for mobile phones is a distinct handicap. As mobile phones are essential for flood warnings to be effective, improved coverage should be a priority.	The NSF recognises this; whilst EE will be rolling out better coverage of 4G across rural Norfolk, all the operators need to do likewise. The Authorities are doing what they can, through the Agreement in section 7.5, to ensure that 5G coverage, when it comes, will offer complete coverage of Norfolk	No change to NSF
ANON-3C85-CAJF-Q	Resident	<p>Broadband: the second largest urban centre in the county does not have access to Basic Broadband (although that is variously described as "less than" 2Mbps in the text and "minimum download speed" of 2Mbps in the key to the accompanying map. Either way this is a major deficiency with major impacts on local businesses that the Framework makes no recommendation or agreement to put right. There should be recognition in the Framework that satellite and WiFi technologies will also not work in many parts of the county, for example even for reasons of buildings being in Conservation Areas and this, too, the planning authorities should recognise and consider policy alterations to accommodate.</p> <p>Broadband: the document concludes that it is "less a strategic issue" and more of a "development management issue" that some areas do not have Superfast Broadband, and may not in new development areas. This is highly questionable, broadband is as much part of the mobility infrastructure as roads and rails, and it is totally unacceptable for the planning authorities to walk away from what will become an ever more important issue in the future in this way. This needs to be reconsidered.</p> <p>Mobile Telephony: Much the same applies as for broadband, and there is no apparent recognition that Next Generation Access (G5) will do anything to improve a currently very poor signal strength and availability in wide areas of the county away from Norwich.</p>	The NSF, and the Norfolk authorities, do not have the power to <i>require</i> higher and more reliable broadband speeds and mobile signals, although clearly they are very strongly encouraged. The text will be adjusted slightly to reflect the fact that satellite and Wi-Fi broadband is, as pointed out, not always a practical solution in some parts of Norfolk. Through their Local Plans, the Norfolk authorities will do what they can to encourage better broadband connectivity	change para 2 (49) to say: "...satellite broadband, although it is recognised that there will be many parts of the county where these are not currently practicable. "
BHLF-3C85-CA69-P	Snettisham Parish Council	Agreement 17 – 5G coverage is irrelevant to most, as it will inevitably be focused in Norwich. This will merely exacerbate the problems with digital inequality within the County, where there are swathes of West Norfolk where even getting a mobile call through is problematical. Please can we have some consistency and balance?	5G will, for the reasons set out in the NSF, need to have near-complete coverage of Norfolk. The rollout of 5G is likely to be phased, but the councils will work to ensure that coverage is rolled out as quickly as possible, to minimise the potential for rural areas to suffer from delays	Amend para 6 of page 51 to say: "...early days of 5G), but the authorities will do all they can, through liaison with mobile providers, to ensure that rural areas of Norfolk get 5G at the same time as urban areas. "
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	<p>3 Broadband: King's Lynn, as the second largest population and economic centre in the County, and classed as a sub-regional centre, does not have Basic Broadband according to the NSF map (although two different definitions of this are given). This is lamentable and the NSF must write robustly that it will insist that this is rectified soonest.</p> <p>4 Broadband: the NSF opines that "this is less a strategic issue" and more a "development management issue", a statement with which we strongly and profoundly disagree. Providing acceptable broadband speeds is taken for granted in most areas of the UK, rural as well as urban, and whilst urban areas in Norfolk remain deficient, this should be considered as a strategic issue as failure to provide it, whilst competitor towns speed ahead, will leave West Norfolk as an economic backwater. This is not acceptable and the NSF must be rewritten in this regard.</p> <p>5 Mobile connectivity: the NSF must be more robustly worded to provide local authorities with the basis to press for greater mobile connectivity included in G4 as well as G5 and more broadly across the county than just provision in the Norwich area.</p>	The Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements in speed and reliability. The text will be re-worded slightly to clarify that broadband is an issue of strategic planning significance, but until emerging Local Plans are adopted, the rollout of high-speed broadband cannot be required through current Local Plan policies. For 5G mobile telephony to work effectively, it will need to have near-complete coverage of the whole of England. Whilst it is inevitable that it will be rolled out sequentially, and so Norwich <i>might</i> be first, it will need to cover the whole of the county	Re-word para 4 page 50 to say: "The availability of high-speed broadband is clearly of major strategic significance for Norfolk. The further rollout of broadband cannot be required through any current Local Plan, but the Norfolk authorities work closely with Better Broadband for Norfolk and other bodies and providers to ensure that high-speed broadband is delivered to more parts of the county as soon as is practicable. Emerging Local Plans will consider the extent to which they could <i>require</i> high-speed broadband to be delivered as part of new developments; the revised National Planning Policy Framework (NPPF), which is due out in spring 2018, might make this easier. The Authorities will also engage proactively with broadband and mobile network providers to better encourage the rollout of new infrastructure, particularly Openreach, and will seek to involve Openreach at the pre-application stage of major residential and commercial planning applications, as well as through consultations on the emerging Local Plans."

ANON-3C85-CA3V-G	Resident	Broadband connectivity and mobile phone coverage has to be the top priority. Ironically, achieving this will probably reduce the need for some of the other infrastructure projects - particularly transport. Decent broadband allowed me to work from a home office about 7 years ago (rather than travel into Norwich), releasing time, increasing my productivity and reducing my annual car journeys by around 6,500 miles.	This is noted and agreed - the Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	With many of the primary substations in Norfolk already reaching capacity, further housing growth in the local area would also put a greater strain on the electricity network. Meanwhile, improvements still need to be made to North Norfolk's communications infrastructure, with unacceptably slow Broadband speeds and poor mobile phone signals limiting the amount of remote working possible, deterring businesses from relocating to the local area, and affecting tourism. However, this will likely require the installation of further base and booster stations to ensure adequate coverage. Hoveton Parish Council believes the locations of these extra stations should be carefully and sympathetically chosen so as not to adversely impact on local landscapes or quality of life.	The NSF recognises how essential fast broadband is and will help to promote this further. The location of base and booster stations is obviously important; where they are "permitted development" there is little control, but elsewhere the policies of the relevant Local Plan and the National Planning Policy Framework should ensure that inappropriate locations and designs are not acceptable.	No change to NSF
BHLF-3C85-CACQ-U	Historic England	Advanced, high quality communications infrastructure is essential for sustainable growth. The development of high speed broadband technology and other communications networks also play a vital role in enhancing provision of local community facilities and services. However, the siting and location of telecommunications equipment can affect the appearance of the public realm, streetscene, the historic environment and wider landscapes. The consideration of their positioning is therefore important, particularly in conservation areas. We suggest that you refer to the following guidance which you may find helpful: Cabinet Siting and Pole Siting Code of Practice: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/205744/Final_Cabinet_and_Pole_Siting_COP_Issue_1_2_.pdf Whilst we support the improvement of network coverage and broadband provision in Norfolk we have concerns regarding the last sentence of section 7.5 on page 47 of the draft Framework document which states that, "Broadly, it should be made as straightforward as possible for 5G base stations and transmitters to be constructed, and common development management policy text to facilitate this should be explored, taking into consideration material planning constraints ". Paragraph 43 of the National Planning Policy Framework (NPPF) states that local planning authorities, in preparing local plans, should support the expansion of electronic communications networks, including telecommunications and high speed broadband but that they should aim to keep the numbers masts and sites to a minimum consistent with the efficient operation of the network. There is concern that the above sentence would facilitate or encourage an overprovision of equipment which would go beyond that necessary for the efficient operation of networks. It is recommended that this sentence is reworded accordingly. Up to date and accurate evidence will be required to support this policy approach in line with paragraph 158 of the NPPF. The NPPF goes on to state that where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate. Crucially, the NPPF identifies the protection and enhancement of the historic environment as being a key strand in what it defines sustainable development (paragraph 7). We would therefore urge the Norfolk Strategic Framework and, any forthcoming associated Local Plans, to ensure that any telecommunications policies include a provision for the protection of the historic environment and a requirement for applicants to consider the siting, design and positioning of equipment in this context.	Comments noted. Some changes to the text to reflect the sensitivity of the historic environment will be added to relevant paragraphs	Add words to para 7, page 50 to say: "...should be explored, taking into account material planning considerations. In particular, care will need to be taken to ensure that new telecommunications equipment is sited and located sensitively in respect of the public realm, street-scene, historic environment and wider landscapes. "
BHLF-3C85-CACK-N	Hoveton Parish Council	Meanwhile, improvements still need to be made to North Norfolk's communications infrastructure, with unacceptably slow Broadband speeds and poor mobile phone signals limiting the amount of remote working possible, deterring businesses from relocating to the local area, and affecting tourism. However, this will likely require the installation of further base and booster stations to ensure adequate coverage.	This is noted and agreed - the Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements	No change
BHLF-3C85-CACJ-M	Tunstead Parish Council	Our main concerns are the availability of better broadband connections and mobile phone reception in rural areas. This is essential for the development of businesses in parishes such as Tunstead.	This is noted and agreed - the Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements	No change
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Mobile & BB: the Council emphasizes the need for high quality infrastructure to support the rural economy and improve the success of small businesses and homeworkers.	This is noted and agreed - the Norfolk authorities will continue to work with mobile providers and Better Broadband for Norfolk project to drive improvements	No change
BHLF-3C85-CA3B-V	Member of Parliament	Turning briefly to infrastructure matters, I have noted the content of section 7.5 (Telecoms) and would wish to see the final framework be much more ambitious in this regard. I know from my own experience that Openreach is keen to have pre-application conversations with developers, promoters and local authorities, particularly on larger developments. I would like to see the final draft of the framework commit local planning authorities to arranging and hosting such discussions with a view to maximising the benefits for future residents. The same principle should apply to health services and education provision.	The comments are welcomed, and the text of the NSF will be strengthened to reflect the points made	Re-word para 4 page 50 to say: "The availability of high-speed broadband is clearly of major strategic significance for Norfolk. The further rollout of broadband cannot be required through any current Local Plan, but the Norfolk authorities work closely with Better Broadband for Norfolk and other bodies and providers to ensure that high-speed broadband is delivered to more parts of the county as soon as is practicable. Emerging Local Plans will consider the extent to which they could <i>require</i> high-speed broadband to be delivered as part of new developments; the revised National Planning Policy Framework (NPPF), which is due out in spring 2018, might make this easier. The Authorities will also engage proactively with broadband and mobile network providers to better encourage the rollout of new infrastructure, particularly Openreach, and will seek to involve Openreach at the pre-application stage of major residential and commercial planning applications, as well as through consultations on the emerging Local Plans."
BHLF-3C85-CAJD-N	Resident	Page 40 – the second objective is "to reduce Norfolk's greenhouse gas emissions" and one of the methods is "to reduce the need to travel". Why not say "to minimise"? You say "maximising the energy efficiency of development" so why not "minimise" for greenhouse gas emissions and travel? It is much stronger and more precise than reducing.	NPPF uses both minimise and reduce so it is considered appropriate wording	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	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.	Agree to make reference to electrical charging infrastructure	Add to Transport agreement - support initiatives for electric vehicles when this is added to future version of NSF

ANON-3C85-CA6V-K	Diss Town Council	<p>It is felt there is insufficient reference to connectivity to neighbouring areas including where relevant, Suffolk and Cambridgeshire.</p> <p>The Diss & District Neighbourhood Plan crosses parish, district and county boundaries to develop a more strategic approach to issues created by the lack of planning for infrastructure investment across the county boundaries. More information is available here: http://www.diss.gov.uk/neighbourhood-planning/</p> <p>It is considered imperative that the Norfolk Strategic Framework also takes account of the need to consider cross boundary requirements.</p> <p>It is therefore suggested to add to the second bullet point below:</p> <p>Section 7 – Infrastructure and Environment Strategic Infrastructure and Environmental Objectives</p> <p>To realise the economic potential of Norfolk and its people by: strengthening Norfolk’s connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure; and ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk’s main settlements and 'across county boundaries' to strengthen inward investment.</p>	Agree, objective updated.	Wording included in objective
ANON-3C85-CAXW-P	NUA	We note the different demographic profile of the city of Norwich compared to the county. We would welcome a strategy that recognised and incorporated the different needs of younger, highly educated and relatively affluent people, with regard to housing, transport and culture, as this would support our shared desire to retain talent within the region.	Agreed, this is an important matter but this is largely a matter for the greater Norwich local Plan, if wider issues are identified then this can be picked up in future versions of the NSF	No change to NSF
ANON-3C85-CA87-P	Resident/Town Councillor	Unsustainable housing is damaging the Environment	Noted	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	Please note points made earlier on need for high quality educational provision across the county not just to service numbers but as part of 'locational' proposition. NB also the interrelationship between the provision of schools on a local basis and trip generation. Communities should be planned such that children can walk to school, safely and independently. The drive towards larger school sizes can mitigate against smart footprinting of settlements to reduce trip generation. Co-location of after school care and nursery schools should also be considered along with public transport accessibility.	Noted	No change to NSF
BHLF-3C85-CACZ-4	Broadland District Council	The Education Standards is NSF pg 49 top of the page. I think this may be a bit out-of-date and the latest Ofsted results better – that doesn’t mean that the statement is wrong, but its probably worth checking with someone at County Education to check that the message is not now a bit different.	Noted changes made as part of an updated section provided by Norfolk county council	Rewritten education section included in update NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	<p>The section on Education should be updated to read: Norfolk’s School Capacity return to the DfE (SCAP) indicates that Norfolk’s school population will continue to grow over the next 10 years. Primary age population including the influence of housing with full permission will rise by around 4% and secondary by 22% (children currently in the school system including the additional 4% covered by growth). Further housing coming forward is likely to produce a higher increase percentage. More specifically, September 2017 school population is over 1300 more than in 2016. Year 10 currently has the lowest cohort of children and numbers have risen steadily since 2006 when that cohort joined the school system in reception. September 2016 reception cohort was nearly 800 pupils higher than it was 5 years ago. Recent years have seen a significant rise in the birth rate and demand for pupil places across the area. Pressure is mainly in urban areas which have seen the highest concentration of population growth. The speed of delivering houses is key to the requirements of school places so careful monitoring of housing progress is undertaken between County Council/District/Borough Councils. Standards in Norfolk schools have risen considerably over the past 5 years with 88% of schools being graded Good or Outstanding in 2017 compared with 70% 4 years ago. The Local Authority retains responsibility for ensuring that there is a sufficient supply of school places and works with a range of partners, eg. Dioceses and Academy Trusts to develop local schemes. Norfolk County Council’s School Growth and Investment Plan, published every January identifies three growth areas requiring more than one new primary phase school and a further 10 areas requiring one new school. Expansion to existing schools will also be required in some areas of the County. A new High School for north east Norwich is also being discussed and planned. Agreement 19 (Education) – is supported and would be strengthened by adding: “H. and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate” Also It would be useful if Agreement 19 could be expanded to indicate: “The authorities agree to continue supporting the implementation of the County Council’s Planning Obligations Standards as a means of justifying any S106 payments or</p>	Agreed	Rewritten education section included in update NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	Similarly, an increase in demand for places at local schools will prove unsustainable unless a sufficient supply of school places goes hand-in-hand with housing development.	Noted this is already part of the planning process with additional school places funded through S106/CIL where appropriate	No change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	Persimmon Homes supports the Agreement for LPAs and the County Council to work together to ensure a sufficient supply of school places and land (Agreement 19). Timely delivery of education infrastructure is critical to the delivery of housing and Persimmon Homes are proud to be a partner in the upcoming delivery of primary school sites in Brad\elf, Sprowston and Hethersett to ensure new school places are available when needed to support families in new housing.	Noted and support welcomed	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 7.3 - it would appear that electricity transmission is a limiting factor for any significant growth. This will be exacerbated if the need to charge electric vehicles becomes more widespread.	Noted, addressing capacity issues is part of the planning and delivery process	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	With many of the primary substations in Norfolk already reaching capacity, further housing growth in the local area would also put a greater strain on the electricity network.	Noted, addressing capacity issues is part of the planning and delivery process	No change to NSF
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Renewable energy: the Council supports the frameworks desire to support renewables. APC feels the focus needs to be on more small scale developments and that these should be focused on wind and not solar.	Noted	No change to NSF
BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	The scale of Figure 11 is too coarse to interpret – insets would be a great help.	Agreed, insert link to NBIS website which contains greater resolution maps	Reference added
BHLF-3C85-CACC-D	South Norfolk Council	Telecoms – chapter 7.5 The map shown in Figure 7 (NGA broadband access as at 2014) is now out of date. This should be replaced with the most recent information.	Noted and map updated	Link added to up to date maps and new map inserted
BHLF-3C85-CA3F-Z	Great Yarmouth Borough Council	A small correction to the ‘Coastal Evidence (Flooding and Coastal Erosion)’ paper published in support of the Norfolk Strategic Framework appears to be required. In the table of uncostered potential future projects at page 28 the reference to a ‘North Winterton flood risk project’ should be deleted: no project of this name is currently known. It appears to have been mistakenly named or listed as a potential project, and its inclusion has led to a degree of confusion and consternation locally.	Agreed and updated	Updated document added to related documents
ANON-3C85-CA87-P	Resident/Town Councillor	Recognises Flooding as an issue but with no money available to address this, just to say it is an issue is not at all helpful	Noted	No change to NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	Given our locality, Council is also very concerned about the risk of coastal flooding, and the funding of sea defences. There seems to be no overall view on this, other than to repeat the problems and leave it to the local authorities. We continue to express our view that NCC should be more involved in the flood defences, as part of a wider shared responsibility.	The Wash East Coastal Management Strategy was developed locally by the EA and Borough Council to provide the overall policy for this part of the Norfolk coastline. This is recognised in the NSF background paper on Flooding and Coastal matters. The County Council's role in coastal matters is outside the remit of the NSF.	No change to NSF

BHLF-3C85-CA3W-H	Hoveton Parish Council	Hoveton has experienced numerous problems in recent years with surface water flooding on roads within the parish, making some key routes impassable at times, and creating dangerous and difficult conditions for road users and pedestrians. Some residential properties have also been identified as being at risk of flooding, whether from surface water flooding, rising river levels, or extreme weather events. The Parish Council feels that, in many areas, surface water drainage is inadequate and unable to cope with current demand, and that these problems will only increase with further housing development. Further housing development would also put extra pressure on local water supplies and foul drainage capacity, which are already stretched in many areas.	Will be passed on to the lead local flood authority	Pass comments onto Norfolk county council
BHLF-3C85-CACM-Q	Savills	Support is given to the aim to minimise the risk of flooding through a co-ordinated and proportionate approach. It is understood that this is in the interests of protecting the communities of Norfolk from the effects of climate change and coastal erosion in accordance with Paragraphs 94 and 95 of the NPPF.	Support is welcomed and noted.	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	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.	Include reference to the Broadland Futures initiative (Broads Authority to provide text).	Include reference to the Broadland Futures initiative
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Flooding: APC supports the proposal but would like to add that a changing weather pattern causes deluges that the current drainage system cannot cope with. There is a need to maintain local low tech infrastructure of ditches and soakaways.	Noted	No change to NSF
ANON-3C85-CA87-P	Resident/Town Councillor	The anticipated departure of immigrants in the NHS and care sector on account of utterly stupid Brexit so called policies, means a breakdown of social infrastructure is inevitable. This section, as with other needs to take into account this elephant in the room.	Impacts too uncertain. It is not possible at this stage to predicted the impacts of Brexit on infrastructure provision	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited supports the commitment to infrastructure enhancements in Norfolk. To address social infrastructure capacity issues, the proposed SUE will include a new link road, two new primary schools, open space and sports pitch provision and other essential infrastructure such as local and neighbourhood centres and utility upgrades. Additionally, provisions will be considered to help enhance existing health and social care facilities through financial contributions, where viable and necessary, in line with the Strategic Services and Development Plan produced by the Primary Care Trust. Attleborough Land Limited also understands the need to upgrade and enhance appropriate utilities infrastructure to support the SUE. The utilities assessment submitted with the application, as part of the environmental statement, sets out the SUE's impact upon existing networks and the new infrastructure needed to support the development. This infrastructure will be upgraded/provided in conjunction with the relevant bodies and secured through the Section 106 legal agreement or direct agreements with infrastructure/utility providers.	Noted, support welcomed	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	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.	Reference to cycling in new transport agreement, other points are part of the objective sections	New transport agreement to include references to this in future version of the NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	Agreement 16 – Council has long had issues with the overall amount of development given problems with infrastructure etc. which it has repeatedly expressed in planning consultations. Hence it is puzzled, indeed shocked, to see that the numbers will be increased to speed up delivery, and that this is “additional” housing. Surely the number should be restricted to what is needed.	The delivery buffer is to ensure required development is met and not to exceed delivery requirements	No change to NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	Overall, the document disappoints, as so much of it seems to be the customary box-ticking exercise, rather than being a document of real value and utility to those whom it affects. Secondly, we see once again the West of the County being disadvantaged in every important respect, and would have hoped for some signs of an understanding of this, with the situation being addressed, given the supposed County-wide nature of a “strategic” document.	Concerns noted but it is unclear as to how the west of the county is being disadvantaged	No change to NSF
ANON-3C85-CA61-E	Define Planning & Design Ltd	The strategic objectives for infrastructure and the environment are supported and appropriately focus on strengthening connectivity through the delivery of new and enhanced infrastructure, linking to the rest of the UK and between and within Norfolk's main settlements. This is fundamental to the delivery of the anticipated development growth across the County and must include connectivity for all settlements already identified as key growth locations, not only the major urban areas. The critical role of other bodies in the planning, funding and delivery of infrastructure should also be explicitly referred to in order to encourage their proactive involvement. For example, the objective should reflect that it is the responsibility of the utilities company to provide the necessary water supply and wastewater infrastructure to support development. Their investment programmes are not necessarily integrated with Development Plans, and often will not address the development requirements for an area until specific proposals become committed, normally through the grant of planning permission. Given the largely rural nature of the County, the scale of growth proposed will inevitably require the development of previously undeveloped land and careful consideration of the environmental benefits will be important in achieving the environmental objectives of this framework. In this regard, the provision of green infrastructure in conjunction with development, and notably multi-functional green spaces to maximise associated recreational benefits, is fully supported. The objectives proposed to improve quality of life for the population overall, both now and in future, can be appropriately met through comprehensive development that encompasses identified social and community facilities and green infrastructure as an integral part of providing new housing and employment. This strategic approach has been applied in relation to the proposed strategic expansion of Fakenham.	Support noted issues engaging with utilities is a national issue. Utilities have been engaged in the production of the NSF particularly Anglian Water. Wider connectivity to be included in a new transport agreement. Agree that reference to how water and water recycling infrastructure is funded as part of the business planning process and by developers should be included in the final Norfolk NSF together with the work currently being undertaken by AW – WRMP and Long Term Recycling Plan.	Updates to water section and new transport agreement to include references to this in future version of the NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	We support the overall strategic and environmental objectives in the Framework. The recognition of the likely key infrastructure improvements that will ease congestion, increase road and rail capacity and will shape future travel patterns is also of importance and will lead part of the sequential analysis which could identify sites to come forward for planned garden communities. We are of the view that there are clear development opportunities linked to re-use of rail lines and the opportunities, should have greater recognition, as highlighted in Question 7 (Section 3), as well as the main rail network improvements, which are also to be supported. We feel that there should be a greater understanding of the role that developments can be made to meet the range of objectives included in this section, and what can be realistically funded by imaginative collective means. With the standard speculative housing model, as primarily advocated in the consultation, these objectives are difficult to secure. Garden community land value capture providing reliable and continuous income through a Garden Community Development Corporation or a long-term land owner/master developer working in partnership with local authorities, can secure funding streams to secure essential infrastructure and community facilities. This creates a genuine opportunity for change. Indeed, it might transform the future spatial expression of community development in Norfolk. The urban extensions to existing towns that are necessary to meet housing growth targets should also be selected on the basis of their ability to fund and deliver critical road, public transport and green infrastructure improvements to people lives through the use of land capture models. A real opportunity now exists to deliver a section of primary distributor road around the south side of Dereham through a series of small urban extensions to ease traffic congestion problems within the town. This approach seeks to extend the same route planned to be delivered through emerging housing allocations 2 and 5 in the pre-submission version of the emerging Breckland Local Plan. As the land required to deliver this route can now be made available through careful long term planning this scheme should be included as a priority road project for promotion within the emerging Framework	These are largely matters for local plans and not strategic cross boundary issues.	No change to NSF

ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	<p>Add to this para: To realise the economic potential of Norfolk and its people by: strengthening Norfolk's connections to the rest of the UK, Europe and beyond by boosting inward investment and international trade through rail, road, sea, air and digital connectivity infrastructure; and ensuring effective and sustainable digital connections and transport infrastructure between and within Norfolk's main settlements to strengthen inward investment.</p> <p>(insert) by strengthening Norfolk's place competitiveness through the delivery of well planned balanced new communities with a range of business space as well as high quality residential, well serviced by local amenities and high quality educational facilities.</p> <p>ie high quality mixed development is part of the infrastructure proposition; as is the provision of the appropriate social infrastructure . New trends in business location and investment trends are gravitating towards locations which make this offer</p> <p>(insert) ensuring the long term preservation of Norfolk's natural environment and heritage, recognising that these are key elements of the county's place competitiveness and locational proposition.</p> <p>As a general point, Norfolk's future infrastructure proposition should be attuned to the critical characteristics of its geography and quality of life proposition.</p>	Agree to add points to objectives with minor wording changes	Points added to objective with minor wording changes
ANON-3C85-CA3K-5	Natural England	<p>Section 7 - Infrastructure and Environment p40 The wording of the environmental objectives to improve and conserve Norfolk's environment should be amended in line with our revised wording for the objectives listed on page 9.</p> <p>p41 Second paragraph, fourth line down. It should read "...its historic City..." rather than "...it's historic City..."</p> <p>7.4 Water p43 Last paragraph, first sentence. Delete the word 'significant' so that it reads "...with no detriment to areas of environmental importance."</p> <p>7.8 Flood Protection and Green Infrastructure Flood Protection. p54 Third paragraph, first sentence. It may be better to replace the word 'could' with 'is likely to' as climate change research has concluded the probability is that these events would happen.</p> <p>p54 Fourth paragraph, second sentence. Add at the end of the sentence "...and away from flood plains wherever possible."</p> <p>p58 Agreement 20. The importance of all of Norfolk's environmental assets in contributing to the financial and social wellbeing of the county should be recognised in the wording of Agreement 20, rather than restricted to those which are located within the Brecks, the Broads and the Norfolk Coast Area of Outstanding Natural Beauty. Environmental assets outside of these areas are under development pressure too. We recommend that Agreement 20 is amended as follows:</p> <p>"a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty, together with environmental assets which lie outside of these areas, bring to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; and</p> <p>b) the pressure that development in Norfolk could place on these assets</p>	Updates made to cover the points mentioned	Updates outlined in comment have been made to NSF
BHLF-3C85-CACQ-U	Historic England	<p>The strategic infrastructure objectives again helpfully refer to the need to protect and enhance the built and historic environment. This section also recognises the need to protect the setting of existing settlements by preventing the unplanned coalescence of settlements. It is necessary to point out there that planned coalescence may also be harmful.</p> <p>The document outlines the need for large scale infrastructure delivery in the area and we are keen to ensure that the historic environment in all its forms is considered at an early stage to ensure its conservation and enhancement. We note that an Infrastructure Delivery Plan (IDP) is currently being prepared and we look forward to being consulted on that document.</p>	Noted, consultation will take place on the individual projects within the IDP	No change to NSF
ANON-3C85-CA62-F	Resident	1. This document contains some nice statements about environmental protection and encouraging alternatives to the car but the details show that the aim is to destroy yet more of what makes Norfolk special and unique. In particular, as areas around Norwich become more and more built up with ugly new housing, roads and business parks, our surroundings will become as degraded and ugly as many existing parts of southern England.	Noted	No change to NSF
ANON-3C85-CA62-F	Resident	3. I only found out about this on 19th September 2017. The consultation needs to be publicised and the consultation period should be longer if you are serious about "increasing community involvement in the development process at local level".	Concerns noted the length and nature of the consultation was considered appropriate for a document of this type.	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	<p>As a general point we would suggest that there is a mismatch between the planning aspiration set out and the infrastructure proposition envisaged.</p> <p>The planning proposition appears to be well grounded in the theory and practice of sustainable community building, however the infrastructure approach appears to take little cognisance of sustainability nor leading edge locational thinking, looking for rather dated heavy infrastructural and car based, rather than place based solutions.</p> <p>A further point is that while the planning proposition is enlightened , it is difficult to see what within this document can make it enforceable.</p> <p>We would welcome discussion on both of these points</p>	Concerns noted the document is a set of agreements which will inform local plans and help fulfil the duty to cooperate.	No change to NSF
ANON-3C85-CA6Q-E	Resident	Observation: As one reads further into this document, the strategy becomes less strong, and devolves its observations to other documents and initiatives outside the framework document. This weakens the value of the document. Infrastructure and environments is one such weak section, with many items of infrastructure and utility solutions being identified. These need to be bottomed out in the same way other sections of the document have done.	Noted, further changes have been made to the infrastructure section	No further change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	Persimmon Homes supports the Norfolk Planning Authorities holistic commitment to providing vital infrastructure enhancements. These enhancements are crucial to facilitate economic growth and meet housing demand in Norfolk. Many key pieces of strategic infrastructure, particular new roads, river crossing and utilities will need public and pooled funding, otherwise viability and delivery, particularly for large allocations, could be compromised.	Noted	No change to NSF
BHLF-3C85-CA34-E	Norfolk Geodiversity Partnership	<p>Strategic Objectives (page 40) No mention of conserving geodiversity. This is a requirement, as per NPPF sections 109 and 117, so needs mentioning here. <protecting sites of geodiversity interest and, where appropriate, enhancing them as part of development.></p> <p>If it is not mentioned as a separate bullet point then it needs adding to bullet point 1: <ensuring the protection and enhancement of Norfolk's environmental assets, including the built and historic environment, geodiversity assets, protected landscapes, Broads and coast;></p> <p>Green Infrastructure (page 57) Geodiversity has not been included in the baseline information scoped for the GI Strategy, contra Natural England's guidance document 2009. The NGP or NBIS can supply</p>	Agreed, this issue was also made by Natural England and their wording has been used.	No further change to NSF

ANON-3C85-CACS-W	Norfolk Wildlife Trust	Support objectives unde "To improve and conserve Norfolk's environment" GI and Environment: planning and provsion of green infrastrucure is critical to help mitigate for impacts of new development on sensitive wildlife sites and to coesate for loss of biodivevrsiyt as a result of new developments. The emerging ecological network and GI maps are an important part of this process. and provide evidence and rational for provsion of new gree space3. Follwing from tis it is critical that fudning meachnisms are in place to ensure that GI is provided as planned.	Support welcomed delivery and funding is subject to on going efforts	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited appreciates the impacts of the SUE upon ecological infrastructure. Therefore, mitigation measures will be exercised wherever possible to preserve and enhance ecological networks. The provision of the linear park and green corridors will enhance the areas biodiversity compared to its current use as arable fields, by providing for a wider range of habitats.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CA3P-A	Heaton Planning Limited on behalf of Brett Aggregates	Section 7 – Infrastructure and Environment Paragraph 7.8 Flood protection and Green Infrastructure Page 57 advocates that, 'Green Infrastructure should be provided as an integral part of all new development'. It may not be appropriate for all development to provide some or additional Green Infrastructure and we would suggest that this should be caveated by, 'where appropriate'. Figure 12 identifies draft Green Infrastructure corridors. Whilst we would support the Local Authorities in devising a general strategy for Green Infrastructure provision, we would suggest that this document is not the appropriate forum for defining these areas. There should be provision at a local level as part of the Plan making process or as part of Planning Applications to assess the quality and quantity of current Green Infrastructure levels and where it may or may not be appropriate to extend/replace.	Regarding the GI corridors, GI is a clear cross boundary issue so Norfolk Authorities working together to address GI not only brings with it economies of scale thus reducing individual Authority costs, but addresses a key cross boundary issue. Individual local plans will reflect this wider Norfolk work as the comment suggests. The NSF will identify more strategic corridors to inform local plans and local delivery opportunities.	Where appropriate added
BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	The Norfolk Coast, the Brecks and Broads are seen by the report as providing economic benefits partly through their attractiveness for tourism and recreation but also through their contribution to the quality of life and hence the attraction of Norfolk as an area in which to work, live and locate a business. This environment is regarded as an asset. There is emphasis within the report on the quality of the environment and the protection and management of environmental assets by ensuring that new development will not harm habitats and species. The impact of housing and recreation are seen as forces to be "monitored" and "mitigated". However in para 7.6 the report says "It is clear that health issues will become an increasingly important consideration in the future planning activities. Development should facilitate a healthy lifestyle through a healthy environment where pollution is controlled and there is adequate access to open spaces and green infrastructure." The report also says that as Norfolk grows considerable investment in the provision and maintenance of the Green Infrastructure network will be needed in order to facilitate and support growth whilst also ensuring that existing and new residents receive the health and quality of life benefits of green infrastructure. Comment: It is pleasing to see that so much emphasis has been put on the benefits of the environment for quality of life and health lifestyles. What is surprising is that there is no mention of Public Rights of Way within the heading of Green Infrastructure. Nor is it clear that the development and maintenance of the historic rights of way are seen as important in meeting the growing demand for walking activities as the requirements for access are only briefly mentioned in the context of development. We are very interested in the concept of Green Infrastructure corridors and the implications of these for access and the PROW network and would like to see more detail or be part of a consultative process. In this context it is worth noting that the Ramblers Association carried out an exercise in 2015 on the PROW network condition, benefits and issues entitled The Big Pathwatch. The results (based on physical surveys of a large and statistically significant random sample of OS squares carried out with online recording of data which involved members of Ramblers and the general public) showed that in Norfolk walking on PROWs was regarded as a positive experience in 25.6% of squares surveyed but that 22.1 % of surveyed OS squares had inconvenient or unusable paths (the remaining half were something in between). We would hope that the report could recognise the importance of developing and maintaining these PROW assets as a network in view of the trends of growth in demand and consistency with quality of life benefits which we note above. Commendable work has been carried out on the Coast path in Norfolk and in developing the network of trails. This attracts visitors and may be also used by local population for exercise. However the rural network of paths and bridleways as a whole is facing a backlog of maintenance and will require a proactive approach to asset management if it is to provide the foundation for the growing numbers of population seeking access and exercise in the countryside. The loss of permissive paths previously funded under the DEFRA environmental stewardship schemes will only add to the pressure on the network.	Green Infrastructure is a catch all term. As set out in this Natural England document, it includes rights of way: publications.naturalengland.org.uk/file/94026. So PROW improvements could be a way of mitigating the impact of development, but so could providing or enhancing other GI types. Authorities do consider PROWs important in the implementation of GI.	Add a footnote to GI giving some brief examples of what GI means. Perhaps reference to the NE guide.
BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	Many of the Neighbourhood Plans under development in West Norfolk are considering Green Infrastructure. In Holme-next-the-Sea, following initial discussions with NCC the NDP team has been looking at ways of dissipating some of the pressures on the immediate coast by extending and improving the accessibility of the parish footpath network (relevant to NSF Figure 11). It would be really helpful if the NSF team could consult or make their own work available to Neighbourhood Plan teams before finalising their ideas on this.	Noted.	Reference to mapping added to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	'Green infrastructure' is also important to Hoveton Parish Council, as the Council recognises that this underpins the tourism economy and the health and wellbeing of residents and visitors alike. The Council agrees that 'green infrastructure' should be provided as an integral part of all new developments, alongside other infrastructure such as utilities and transport networks, and it is pleased to see Local Planning Authorities will be working together to produce a GI Strategy for Norfolk which will aid Local Plans in protecting and enhancing local assets such as conservation areas and Areas of Outstanding Natural Beauty. "	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CA3G-1	Dereham Town Council	The Town Council welcomes Green Infrastructure being given a high profile in the Framework with important and key green corridors being identified . This however does not accord with the Breckland Local Plan pre-submission which explicitly states that there are no key green linkages worth protecting and all green infrastructure has the same value and should be protected.	Noted. This is a matter for the breckland local plan	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	An aspirational GI proposition should be designed in to be part and parcel of every development as it enhances value and encourages healthy lifestyles. It is critical to see this as part of a wider dialogue with the farming community who can cheply and effectively produce extended walks through the institution of permissive paths. The edge of settlement should also be seen as part of a positive dialogue with farmers around public access, small scale growing and supporting local food sourcing. As DEFRA is in process of rethinking its support of farming these issues should be considered and advanced as partb fo a new settlement with the farming industry. It is critical that a strategic GI proposition is accompanied by consideration of how people can sustainably access the Broads and Coast, and other key visitor and tourist destinations. Norfolks Coast and Broads are already experiencing capacity issues it is vital that these key natural resources are not undermined by excessive popularity, and maintained in their integrity. The wider Norfolk Countryside fulfils a critical role both in supplying the nations food and in operating to support retreat and peace and quiet. Even areas which are not of outstanding beauty or ecological value have a role to play in fulfilling this role within a complex national geography. This should be respected in planning for growth. It should further be recognised that the county may face an exponential rise in visits when the recreational needs of the growth agendas of Cambridgeshire, Norfolk, Suffolk and East Midlands are taken into account together with the trend towards staycation and the weak pound. It will be vital that sustainable movement and accommodation solutions are found that do not negatively impact on the integrity of Norfolks natural and heritage environment, reconciling positively the opportunity of economic growth and the daily needs of local residents.	Local Plans are required to assess any likely significant impact on European designated sites and some of these protected sites do exist in the protected landscapes quoted. To inform the Habitat Regulation Assessment of the Local Plans, Norfolk Authorities commissioned recreational impact surveys which provide evidence to help understand the impacts development in Norfolk and further afield can have on the protected sites.	No change to NSF
BHLF-3C85-CAC8-2	Suffolk County Council	It is noted that, as part of the Green Infrastructure Strategy, there are Green Infrastructure Corridors, some of which abut the county boundary. It would be helpful to have further discussions to consider whether there is merit in tying these into initiatives in Suffolk.	Agreed. We will share the findings of the mapping work on line and discussion with neighbouring authorities will taken place.	Reference to mapping added to NSF
BHLF-3C85-CACM-Q	Savills	Objection is raised with regard to the provisions relating to green infrastructure. The NSF should provide guidance to clearly outline what provision is required both on-site and off-site. In order to ensure the viability and deliverability of new developments, the NSF should ensure that policy requirements do not overlap and/or are not excessive (e.g. green infrastructure being required on site but also contributions required to provision off-site).	The NSF addresses strategic issues. This comment seems to relate to individual development sites. Each Local Plan will have policies relating to GI.	No change to NSF

BHLF-3C85-CACQ-U	Historic England	We support the consideration of Green Infrastructure (GI) at the cross boundary strategic level. The draft Norfolk Strategic Framework document does seek to protect, manage and enhance the built and historic environment which is welcomed. Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation. It may be helpful to make further reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as church yards to improve the setting of historic buildings or historic townscape. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term. "	Agree that the heritage benefits of GI could be referenced. Churchyards are an important part of GI. Comment regarding maintenance noted however this is a local issue.	Add reference to heritage into the first GI para of the NSF.
BHLF-3C85-CACQ-U	Historic England	The use of multi-functional greenspaces can help enhance the historic environment by better revealing it and making it more accessible. Therefore the strategic objective to provide a network of accessible multifunctional greenspaces should be beneficial to the historic environment and is welcomed.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	"New GI can also mitigate impacts on existing ECOLOGICALLY sensitive sites."	Agreed.	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	It is recognised that as the NSF is rolled forward and updated, there will be a need to add GI projects as they reach an appropriate stage in their development.	Noted, although this will be for future versions of the NSF.	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	'Green infrastructure' is also important to Hoveton Parish Council, as the Council recognises that this underpins the tourism economy and the health and wellbeing of residents and visitors alike.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	The Council agrees that 'green infrastructure' should be provided as an integral part of all new developments, alongside other infrastructure such as utilities and transport networks, and it is pleased to see Local Planning Authorities will be working together to produce a GI Strategy for Norfolk which will aid Local Plans in protecting and enhancing local assets such as conservation areas and Areas of Outstanding Natural Beauty.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CA36-G	Forestry Commission East and East Midlands	Thank you for consulting the Forestry Commission on the Norfolk Strategic framework. The Forestry Commission is a non-statutory consultee on developments in or within 500m of ancient woodland we are also Statutory Consultees for restoration of waste and mineral sites to forestry and the competent authority for Environmental Impact Assessments (forestry). Our role as a Government Department is to provide you with any information which can help you in decisions with regard to planning proposals which may impact on Ancient Woodland in particular and any other woodland where it may be relevant to your plans. Ancient Woodland as it is an irreplaceable habitat is a particular concern and in order to help Planning Authorities the Forestry Commission has prepared joint standing advice with Natural England on ancient woodland and veteran trees. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. The Standing Advice website will provide you with links to Natural England's Ancient Woodland Inventory, assessment guides and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. Case Decisions demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our website. We note that in the strategy it states in Agreement 20: In recognition of: a) the importance the Brecks, the Broads and the Area of Outstanding National Beauty bring to the county in relation to quality of life, health and wellbeing, economy, tourism and benefits to biodiversity; and b) the pressure that development in Norfolk could place on these assets the Local Planning Authorities will work together to produce a GI Strategy for Norfolk by the end of 2017 which will aid Local Plans in protecting and where appropriate enhancing the relevant assets. We also note that whilst the Brecks are mentioned there isn't any mention of Thetford Forest (the largest lowland Forest in England) or of Forest Enterprise England (FEE) the agency of the Forestry Commission that manages the Public Forest Estate. Given the significant importance of Thetford Forest to the tourist economy and the environment <ul style="list-style-type: none"> 1 million visitors/year it encompasses 20% of the Breckland Environmentally Sensitive Area and is therefore a significant contributor to Breckland conservation. 	Noted. Forestry Commission will be contacted regarding the GI mapping work.	NSF to involve the Forestry Commission regarding future GI work.
BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	The document notes the importance of tourism businesses, which are more dispersed than many other economic activities - and far wider than "Norfolk Coast, the Broads and the Brecks" listed. Comment: Norfolk has a number of promoted 'Norfolk Trails' across the county, plus, in many locations (though not all), a good network of PROW. Together these can constitute an opportunity to promote the county as a good destination for walkers and cyclists, but one that is not located within specific localities.	Noted. PROW have informed the Norfolk-wide green infrastructure mapping work that is ongoing.	Add PROW and 'Norfolk Trails' as an important asset
ANON-3C85-CA31-B	Wroxham Parish Council	'Green infrastructure' is also important to Wroxham Parish Council, as the Council recognises that this underpins the tourism economy and the health and wellbeing of residents and visitors alike. The Council agrees that 'green infrastructure' should be provided as an integral part of all new developments, alongside other infrastructure such as utilities and transport networks, and it is pleased to see Local Planning Authorities will be working together to produce a GI Strategy for Norfolk which will aid Local Plans in protecting and enhancing local assets such as conservation areas and Areas of Outstanding Natural Beauty.	Support for green infrastructure noted.	No change to NSF
BHLF-3C85-CACG-H	Persimmon Homes	Persimmon Homes acknowledge the recognition of the Brecks, Broads and AONB importance to the quality of life (Agreement 20). However, there does need to be a further recognition that these areas are also reasons why people will want to live and work in Norfolk. There needs to be an acceptance that these places will be used by new residents. Such pressure should not be used as a reason for not allowing new development where it is needed, particularly where impacts can be mitigated,	The agreement as drafted recognises that these landscapes are reasons why people live here and visit, through reference to the benefit they make to the quality of life, the economy and tourism. Local Plans are required to assess any likely significant impact on European designated sites and some of these protected sites do exist in the protected landscapes quoted. To inform the Habitat Regulation Assessment of the Local Plans, Norfolk Authorities commissioned recreational impact surveys which go some way to help understand the impacts development in Norfolk and further afield can have on the protected sites.	No change to NSF
ANON-3C85-CAXS-J	Resident	Improved services at NNUH must be achieved.	Noted the health protocol aims to help address these issues.	No change to NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	Council also notes a prediction of a 43% increase in the number of over-65s in the Borough of KL&WN. We know from our own research (during our Neighbourhood Plan preparation) that the single most pressing concern of residents is the provision of GPs, and the difficulty obtaining treatment and appointments. There does not seem to be anything about the number of doctors to cope with that increase, however, but much about the consultation of CCGs on house-building. As ever, we will not get the service sorted to cope with present levels before the additional housing is introduced, but will muddle through; it is simply not acceptable to say that the provision is a commercial decision for health providers. Something on attracting medical professionals to Norfolk, a well-documented problem, would be more useful.	Noted the health protocol aims to help address these issues.	No change to NSF

BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	<p>The plan clearly identifies some important trends which are likely to occur within this period. It notes in particular that there will be growth in terms of population, economic development (including tourism) and housing. Much of the growth in jobs is expected to occur in the greater Norwich area but corridors of growth are identified between Cambridge and Norwich, King's Lynn and Cambridge and along the A47 corridor between Norwich and King's Lynn. A number of interventions are planned in a new economic strategy to be published in 2017. Population as a whole is projected to grow by 14 % (2014 to 2036) with most of the growth occurring in the over 65s population which is projected to increase by 46%. This increase in the over 65s is especially marked in South Norfolk, Breckland and North Norfolk. Despite the relatively stable population for the under 65s, the number of jobs is projected to grow by over 60,000 of which about two thirds is in the Norwich area. It is expected that housing will grow to accommodate the growth in household formation but that excludes the need for social care where a deficit of over 8,000 care home places is projected (as against 9,900 care home places and a deficit of 600 now).</p> <p>Comment: With a recognition of increasing longevity there is a growing demand from the over 50s for physically active recreational activities which help manage risks of ill health through diabetes, heart attacks and strokes. Awareness of risk, including the lack of care facilities, appears to be driving more healthy behaviour and creating a fitter more active cohort of retirees. Health walking, rambling and strolling activities are being promoted as an effective and safe means of retaining good health and we are likely to see a significant growth in these activities as the population of over 65s increases. Variety of route and surroundings is an important feature of walking. The nature of the demand varies and ranges from individual short circular walks or strolls of up to 3 miles, brisk organised group walking usually around 3 miles and longer group led circular walks, mostly between 4 and 10 miles. Longer walks of up to 20 miles are usually the choice of younger and fitter walkers. City walking as an alternative to the use of cars will grow too but this is a more journey based, repetitive activity. We comment later on the steps already taken to develop rural walking infrastructure and the challenge of maintaining a viable network of public rights of way (PROW). At this point our main point is that the growth of the over 65 population is very significant and we believe that it is an omission of the report to fail to reflect the growth in their walking activities and the likely consequences for green infrastructure.</p>	It is considered that the points raised are covered in the first paragraphs of the health section	References made in GI section to the demographic changes likely in Norfolk and ensuring that they have appropriate access to recreational opportunities
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	All development should be designed with the aim of maximising walkability to underpin public health objectives, This means planning for and delivering mixed use development where daily needs can be served on foot or by other sustainable modes. The potential for active leisure should also be built into developments with the re-institution of funding (if not via DEFRA through a local CIL type mechanism) regimes that open up permissive paths into the countryside to facilitate extended walking and riding.	It is considered that the points raised are covered in the first paragraphs of the health section	No change to NSF
ANON-3C85-CACR-V	Norfolk & Waveney STP	<p>The Norfolk Strategic Framework for planning does not make any reference to the Norfolk and Waveney Sustainability and Transformation Partnership (STP), and does not appear to have considered how planning in health can be applied in conjunction with the principles of the STP. This is of concern to the STP partners for a number of reasons, as discussed below.</p> <p>The aims of the STP are to develop closer and more integrated working amongst the different partners and providers of healthcare across Norfolk and Waveney. This includes moving care closer to home and focussing on prevention of illness. In order to be able to achieve planned improvement to health and care, integration of services around local communities, and enable delivery of new models of care, it is important the estate function of the STP remains flexible and responsive to the planning system – leading to the development of fit for purpose health infrastructure that provides the health services required by the public. In order to do this, it is imperative that the planning process engages with the STP at the earliest opportunity, ensuring that the planning proposals meet the needs of all of stakeholders involved and the STP can be incorporated into the process moving forward rather than retrospectively applied to the possible detriment of all involved.</p> <p>As part of a collaborative and joined up approach to delivering healthcare, and considering the principles of the One Public Estate (OPE) programme, the estate space required may not be standalone but may be integrated with other public sector services, for example in a community hub. It is important that OPE/STP is considered at the very early stages of planning to ensure that buildings and services are future proofed and will be fit for purpose for future years. By engaging with the STP process at this early stage it would allow for input to ensure that this occurs and that where necessary, and to ensure future proofing, sufficient flexibility can be applied to any proposals involving health.</p> <p>The publication of the Health Protocol for engagement of health in planning matters recognises the role of Clinical Commissioning Groups (CCGs) as the primary authorities for planning of health services. The advent of introducing Sustainable Transformation Plans within the NHS has led to a collaboration of commissioning and provision across health systems. This is represented in all spheres of health service design, and as such, has become a single point of contact for Planning Authorities to link to for planning purposes within health infrastructure. The Norfolk & Waveney STP combines CCGs and health providers within its Estates Work stream to manage and plan strategy for health infrastructure development.</p> <p>In consideration of the recommendation 18 of the Consultation document (to adopt the Health Engagement Protocol as set out), feedback and agreement is sought to amend the published Health protocol to encompass development within the Health sector of the STP, and the role it plays in response to Planning matters. The current Protocol does not appear to have been authored by Health system representatives, and therefore a short period of review of the main document is recommended between Protocol authors and representatives of the STP / Health system to ensure the document and future form of engagement is in line with Health system strategy and development.</p>	The comment is noted and accepted. Contact has been made with Norfolk and Waveney Sustainability and Transformation Partnership to discuss ways in which the Planning in Health Protocol can be aligned with the priorities of the Sustainability and Transformation Panel.	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	The Parish Council supports the idea that 'health and wellbeing of the population' and health infrastructure should be considered in planning decision making. Hoveton's medical centre and other local healthcare services are already under pressure, and a population increase from further housing development would only exacerbate the problems being experienced by local residents when trying to access timely, quality health care.	Noted the health protocol aims to help address these issues.	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	<p>"Comments from a public health perspective Several of these comments relate to the potential for shared priorities and consistent approaches rather than specific strategic cross boundary issues. Nevertheless, the NSF provides the opportunity to consider this potential.</p> <ul style="list-style-type: none"> • Support the principle to develop a "good relationship between homes and jobs" as it supports active travel and minimises vehicular movements, while recognising the need to avoid any potential adverse environmental impacts on residential accommodation of the employment activity within a close proximity (air quality, noise, access to open spaces etc.) (p.8) • Support "a major shift away from car use towards public transport, walking and cycling" (p.8). Recent evidence review by Public Health England on spatial planning correlates provision of active travel infrastructure and public transport with better outcomes relating to health, cardio vascular disease and road traffic accidents / KSI • Provision of good quality housing (p.9) is a fundamental determinant of health and we would strongly support a mix of accommodation which meets a variety of income and physical needs. The same PHE report emphasises the importance of warm and energy efficient homes on health outcomes. There is also evidence which highlights the importance of upgrading existing stock as well as the quality of new build and some reference to this may be welcome. It may also keep existing housing stock in use for longer, reducing the need for new build. 	Support Noted	No change to NSF

BHLF-3C85-CAC5-Y	Norfolk County Council	<ul style="list-style-type: none"> The review also highlights the need to consider particular housing needs of other groups such as those with a learning disability, history of substance misuse, affordable housing for those who are homeless and those with chronic medical conditions such as HIV / AIDS. The need to plan for older people and students is referenced (p.37) so specific reference here may make sure these groups are not overlooked Access to sporting, physical activity and green and open spaces and facilities is supported and we want to ensure this is available across tenures and locations, with particular reference to the challenges within the housing White Paper on access to open spaces within urban areas1 With a 2036 end date for the framework, and the recent announcement on sales of petrol and diesel cars ending by 2040, the NSF could usefully reference cross border and cross agency work to support the switch to low emission vehicles, for example, charging points delivered both within new developments and at appropriate points on the road network (p.15). This is supported by recent NICE guidance on air quality Consideration could be given to a consistent approach on urban design for example the use of green walls and planting to mitigate poor air quality or avoid unintended consequences relating to “air canyons” may be useful With regard to population and household estimates and the impact of, for example, life expectancy we would also highlight a number of factors to consider from the recent 2017 Health profile for England : <ul style="list-style-type: none"> Life expectancy continues to rise, albeit at a declining rate, but the number of years spent in poor health is increasing. This will impact the need for particular housing, transport and service delivery solutions The life expectancy gap between men and women is closing which may later affect the size of older person households over time Deprivation and inequality continue to be key and enduring factors in poor health outcomes and so need addressing. Consequently access to housing and employment and the impact of spatial and economic planning on these factors needs consideration There is growing evidence of the link between incidents of flooding (p.55) and poor mental health 	Agreed reference made to charging points in new transport agreement. Point regarding urban design is a matter for local plans. Agreed to add demographic points to section 4.	Section 4 updated
BHLF-3C85-CAC5-Y	Norfolk County Council	<ul style="list-style-type: none"> It is recognised (p.31) that affordability is a key barrier to accessing good quality housing. Given the proposed changes in some definitions of affordability within the White Paper2 we would welcome some consistent approach across the county which would support adequate provision across localities and reduce the risk of development being piecemeal over geographic boundaries. Given the pressures on the electricity and water infrastructures we would support a countywide approach to increasing capacity which minimises environmental impact through construction materials and processes, noise and loss of green infrastructure Without underplaying the importance of physical inactivity and smoking on causes of death (p.47) the 2017 state of England does introduce concerns about other factors, some of which may be ameliorated by spatial planning interventions. These include dementia and Alzheimer’s and poor diet. There are some links back not only to physical activity but also accessibility of affordable and good quality food. A county wide approach to land use and affordable fresh fruit and vegetables in particular would be welcomed We would support use of the health Protocol, for example, to plan for and manage access to health care, although evidence suggests that other factors related to income, environment, education etc. are much more closely correlated to good health outcomes Underpinning this response are some key themes around: <ul style="list-style-type: none"> Air quality Affordable and good quality housing Physical activity and transport Diet and access to good food Employment for all We would also welcome cross-authority consistency on some of these key measures to reduce the risk of developments varying within the county and therefore impacting populations in different ways or enabling activity to pick locations where the health requirements are seen to be of a lesser order." 	First point affordability issues are best dealt with in local plans because needs and viability vary from district to district. Support for the health protocol noted and other issues are already covered by the NSF where appropriate. There is no evidence the final point will be a significant issue	No change to NSF
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Health: APC agrees that there is a desperate need for a new protocol on planning of health services and would ask that anything that can be done at a national level to make implementation mandatory, this be pursued	Noted	No change to NSF
BHLF-3C85-CAC8-2	Suffolk County Council	It is noted that Norfolk County Council is preparing an Infrastructure Delivery Plan and it would be helpful to engage at an appropriate point in this with the Suffolk LAs to consider whether there are wider issues that need to be dealt with together. There could usefully be reference to this within the Framework.	Agreed	No change to NSF
ANON-3C85-CAXF-5	No to Relay Stations	I repeat what I said earlier. There needs to be protection for all landscapes, not just 'protected' landscapes. Not everyone has the time or money to join conservation groups and visit reserves. Although I am a member of the Norfolk Wildlife Trust I have a rich variety of wildlife on my doorstep, easily accessible for example after I was recovering from injury. This landscape and this wildlife is at risk - and yet this is the kind of environment that most people can enjoy for free, and which enriches our daily lives. There is a short-sightedness which only places value on specific areas. It is the day to day quality of life of ordinary people which should matter, not just protection of the Broads and other designated areas	The same point was raised by Natural England and their wording has been used.	No further change to NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	The Somerleyton Estate would also like to see a strong case made for the Norfolk local authorities working with peripheral farmers and landowners like us to create an attractive accessible 'living landscape' around towns such as Great Yarmouth working closely with or being led by Norfolk Wildlife Trust and to an extent the Broads Authority National Park – much as the manner of Suffolk Wildlife Trust does at Carlton Marshes. The Somerleyton Estate believes that Great Yarmouth has traditionally looked out to sea but it also needs to look inland too and celebrate and breathe life and environmental protection into the Yare river valley, marshes and arable hinterland. The Somerleyton Estate is well positioned across both counties to assist the Norfolk local authorities and Great Yarmouth in particular in developing this strategy and would like to do so	Noted	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	The document should clarify what is meant by ‘protection and maintaining the Wensum, Coast, Brecks and the Broads’ and why these areas are significant. If the reference is targeted at designated sites of most significance to Norfolk e.g. Area of Outstanding Natural Beauty, National Park and European designated sites, these should be referred to in the appropriate context. The NSF should be specific that the GI network will also require enhancement in order to support growth	Agreement 20 will be updated to clarify.	No further change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	Hoveton Parish Council believes the locations of these extra stations should be carefully and sympathetically chosen so as not to adversely impact on local landscapes or quality of life.	Noted	No change to NSF
BHLF-3C85-CACA-B	Ashmanhaugh Parish Council	Light pollution: the Council would like to see this added as it feels the current level of planning and environmental health legislation does not sufficiently cover the problems of the countryside.	Light pollution is not a matter that the NSF can address	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	In the Appendix comments relating to page 58 of the NSF, a Member asked that consideration be given to including reference to the tributaries of the Wensum	The specific reference to the Wensum is in recognition of its international importance	No change to NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	Comments about Section 7 - Infrastructure and Environment In Section 7 ‘Infrastructure and Environment’ a number of strategic objectives are proposed under separate sub-headings. As with our comments on Section 2.3 set out above please add the following bullet points under the sub-headings in Section 7: “To realise the economic potential of Norfolk and its people by:” • Supporting the County’s tourism offer and the environment upon which it relies. “To reduce Norfolk’s greenhouse gas emissions as well as the impact from, exposure to, and effects of climate change by:” • Supporting and facilitating indigenous tourism development. Also in Section 7 under the sub-heading “To improve and conserve Norfolk’s environment” the following bullet point objective is noted as particularly important by the Somerleyton Estate in protecting assets such as the Fritton Lake Resort: • “Protecting the landscape setting of our existing settlements where possible and preventing the unplanned coalescence of settlements”.	No specific sectors are addressed in the vision and objectives however it is agreed to enhance the tourism reference in the economic section.	Tourism Reference added in Economic Section

BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	It would improve presentation if sections on Infrastructure and the Environment were separated – the Transport elements of Sections 7.1 and 7.7 seem to fit more logically alongside the presentation of the economic growth framework and connections. Footnote 37 refers to current and future travel times for Norwich – London. It would be helpful to see comparative figures for Kings Lynn – London.	While they could be separated they have been combined to highlight the importance of GI as a type of infrastructure	No change to NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	In Section 7.1 'Introduction' the Somerleyton Estate points to a statement which is of significant importance to them where it states: "As is reflected in the introductory text in this framework and is recognised in the agreed vision and objectives the future economic and social prospects for the County cannot be divorced from issues of environmental protection and infrastructure provision. The quality of Norfolk's environment, both in terms of the countryside, it's historic City and the wide range of distinctive towns and villages it includes, give access to a quality of life which is one of the key selling points of the County and the retention and enhancement of which will be crucial to attracting the growth in highly productive economic sectors that is sought". The Somerleyton Estate request that this section is highlighted because of its significance to maintaining the visibility of the tourism sector to the Norfolk Local Authorities.	Based on comments received references to tourism have been changed within the Economic section of the NSF. However Norfolk's environment plays an important role in all types of economic development not just tourism.	No further change to the NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	In Section 7.8 'Flood Protection and Green Infrastructure' and under the sub-heading 'Green Infrastructure and the Environment' the Framework states that: "Green infrastructure is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of economic, environmental and quality of life benefits for local communities. The provision of green infrastructure in and around urban areas helps create high quality places where people want to live and, work and visit. New GI can also mitigate impacts on existing sensitive sites." The Somerleyton Estate wholeheartedly supports that statement and requests the minor amendments as set out above. Further in this section the Somerleyton Estate again wholeheartedly support the section which states: "As Norfolk grows considerable investment in the provision and maintenance of a GI network will be needed in order to facilitate and support growth whilst also: • Minimising the contributions to climate change and addressing their impact; • Protecting, managing and enhancing the natural, built and historical environment, including landscapes, natural resources and areas of natural habitat or nature conservation value; • Ensuring existing and new residents receive the health and quality of life benefits of good green infrastructure; • Maintaining the economic benefits of a high quality environment for tourism; and • Protecting and maintaining the Wensum, Coast, Brecks and the Broads." This is precisely the message which the Somerleyton Estate wishes to see threaded throughout relevant sections of the Framework as discussed above.	Support Noted	No change to NSF
ANON-3C85-CAJF-Q	Resident	Social Infrastructure - health and education - under health provision there is no mention at all of access to health services, and for many this is a current and growing problem which will worsen over time. This arises from the confluence of NHS centralisation of health provision whilst at the same time the reduction of (particularly) bus services in the county due to funding constraints. Not mentioning it does not mean that it is not an issue, nor does it mean that the issue will disappear and the section needs amendment to include reference to it, and to indicate the planning authorities' view of how to lessen the extent of the issue.	Noted the health protocol aims to help address these issues.	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	6 Social infrastructure: we note the sections on education and health. Improving educational standards is essential to supply a more qualified workforce and this is especially so in West Norfolk which lags in aspiration and attainment standards. We are concerned that the growing aged population in West Norfolk is already having greater difficulty in accessing health services, and NHS continually centralises these facilities and at the same time transportation services are in decline, especially in rural areas	Concerns Noted	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	Hoveton Parish Council is also concerned that any future proposals for housing development should take into account the impact these developments would have on social infrastructure. The Parish Council supports the idea that 'health and wellbeing of the population' and health infrastructure should be considered in planning decision making. Hoveton's medical centre and other local healthcare services are already under pressure, and a population increase from further housing development would only exacerbate the problems being experienced by local residents when trying to access timely, quality health care. Similarly, an increase in demand for places at local schools will prove unsustainable unless a sufficient supply of school places goes hand-in-hand with housing development.	Noted this is a matter for local plans (for discussion with North Norfolk DC and Greater Norwich Partnership).	No change to NSF
ANON-3C85-CA8D-3	Norwich Cathedral	Whilst it is good that there is an emphasis on promoting tourism and heritage and improving infrastructure, thought also need to be given to what happens when tourists arrive. In particular Norwich is very poorly served for coach parks and we struggle to attract coach parties because of this and those that do come frequently complain and the lack of adequate coach parking. Similarly we regularly receive complaints about poor signage both for motorists within the city and pedestrians. Infrastructure plan needs to think not only about overall connectivity but also how people will be handled when they arrive at their destination otherwise this produces huge frustrations and then makes people wish they had not travelled	Noted. Issues for the Norwich Area Transportation Strategy (NATS) review and City Council planning department	No change to NSF
ANON-3C85-CA8T-K	Hockering Parish Council	Public transport should be developed instead of building new roads and destroying the environment.	Noted. The NSF recognises that there is a need for both strategic road and public transport improvements.	No change to NSF
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	To improve the quality of life for all the population of Norfolk by: ☑ ensuring new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure; This aim contradicts the earlier aim copied below: To reduce Norfolk's greenhouse gas emissions as well as the impact on, exposure to, and effects of climate change by: ☑ locating development so as to reduce the need to travel; Reducing the need to travel contributes to a healthier environment and would damage rural communities	These aims are considered to be compatible and reflect national policy. The approach does not prevent an appropriate scale of growth in rural communities, reflecting the availability of local services.	No change to NSF
ANON-3C85-CAXS-J	Resident	The missing NDR link must be built to achieve the full purpose of the road. The main spur roads out of Norwich eg to Cromer must not be overlooked. Workers and ambulances need faster routes from the rural areas.	Support for Norwich Western Link welcomed. Suggested needs for other improvements noted for consideration in future review of the Local Transport Plan.	Norwich western link to be considered in transport agreement in future version of the NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	All the proposed new housing brings with it an increase in traffic. You can't have it both ways. More people and less pollution does not work	Noted. Planning seeks to balance these issues and reduce the impacts of needed growth	No change to NSF
ANON-3C85-CAXA-Z	West Suffolk	West Suffolk supports the approaches advocated by the Norfolk Strategy Framework. We look forward to working together to achieve growth and consider that developments around the A11 would be best achieved after improvements are made to the A11 Fiveways junction.	Support welcomed	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited supports the identification of the Attleborough Link Road in the Priority Road Projects for Promotion (Table 12). If public funding is secured, the Link Road will be able to be delivered earlier than would be the case is funded through the proceeds of development alone.	Support welcomed	No change to NSF
BHLF-3C85-CAJB-K	Fen Line Users Association	Table 11: Committed Transport Projects We note and support the inclusion of the "half-hourly" King's Lynn-King's Cross Government franchise commitment in note 52 at the foot of this table. The comments above on Section 5 are made in the context of seeking the earliest delivery of this commitment. We request that the County Council includes in the Table details of Network Rail's current King's Lynn-Cambridge 8-car scheme which, as well as doubling the number of seats per train (446 in an 8-car class 387/1 train) will permit currently overcrowded King's Lynn-King's Cross trains to stop at the new Cambridge North station (as noted in the text in Section 5). Details can be found at: https://16cbgt3sbwr8204sf92da3xx5m-wpengine.netdna-ssl.com/wp-content/uploads/2017/06/Enhancements-Delivery-Plan-June-2017.pdf (page 33 of 189). Table "93" [13?] Priority Rail projects for promotion We note the inclusion of the Ely Area Enhancements in this table. This scheme is necessary but not sufficient for the introduction of the King's Lynn-King's Cross "half-hourly" service as well as to other rail service improvements. You will know that the Greater Cambridge Greater Peterborough LEP, the New Anglia LEP and the Strategic Freight Network have allocated £8.8m for feasibility studies to GRIP 3a in order to permit the earliest go-ahead of these works in CP6 (Growth deal 3 funding refers) and we request that this information be added to the notes to this Table. You will also note that the Secretary of State intends to issue the Statement of Funds Available (SOFA) for	NSF has been updated to include information on the King's Lynn-Cambridge 8-car scheme.	NSF has been updated to include information of the King's Lynn-Cambridge 8-car scheme.

BHLF-3C85-CAJD-N	Resident	Page 53 – Table 12 lists solely road projects. Are there also millions of £s proposed for cycle networks? I cannot find any reference yet they are essential. Firstly, is there reference elsewhere in the document to the provision of cycling infrastructure? And secondly has any account been taken of the government's new Cycling and Walking Investment Strategy? To give a simple example, I would love to cycle from Sheringham to Cromer, but certainly not along the A149, which would be 4 miles. Instead I would have to use country lanes on a circuitous route of 10 miles. Hardly appropriate if encouraging people to cycle to work instead of driving. There is a coastal path between the two towns yet coastal paths generally are being provided/improved without any thought being given to making them cyclable as well. No joined up thinking!	Support for cycling is welcomed. However, outside of the Norwich area, cycling is not a strategic cross boundary issue. Matter for Local Plans and the Local Transport Plan	No change to NSF
ANON-3C85-CAJG-R	Resident	The document fails to recognise that North Norfolk only has substandard A roads. It takes about an hour to access any dual carriageway route. The poor quality roads increase local flooding and cause increased damage to cars. The increasing risk of hitting deer due to rising numbers must be considered. Access must be improved including to rail stations and airports beside Norwich. All residents must have access to the same high quality broadband and mobile phone facilities, not have to pay the same charges to receive substandard service. North Norfolk requires affordable public swimming pool and gym access like other parts of the county so full time residents can undertake sports which improve heart rate etc at all times of the year. The NDR must be completed to provide access from Dereham, Fakenham and Swaffham. Housing design must allow proper maintenance and fire protection. The new developments of block work and cladding must be reviewed considering the likely twenty/thirty year maintenance impact. The county's planners must work with developers to encourage the building of more suitable properties for retired people and second home owners, including considering the parking and garden requirements. North Norfolk towns and villages are suffering increasing parking problems when second homers and tourists are about.	Noted. Local Plan issues	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	Para 7.7 - ideally we should be aiming at building an west east rail line from Peterborough via King's Lynn, Fakenham, Norwich to Great Yarmouth and Lowestoft. Where large scale housing is to be developed as at West Winch, an efficient reliable transport system should be integral with the design to take residents to places of work, shopping complexes and town centres. The sand line could be used from King's Lynn town centre to the A149 and then it could turn southwards past the Hardwick Industrial units and then through all 3 sections of the new development. This could be a tram or light rail system. Increasing the traffic around the Hardwick interchange and the congestion in King's Lynn town centre is not a sustainable policy. The A10 relief road should start near the junction with the A134 and then go over or under the A47 to then link with the A148 /A149 further north because a large amount of the traffic on the A10 is destined for the North Norfolk Coast. Such a design avoids the need for costly disruptive alterations to the Hardwick interchange. There is a group investigating the feasibility of re-instating the rail link between Hunstanton and King's Lynn using some but not all of the previous track bed and that it also seem sensible to safeguard the former trackbed from Heacham to Wells which would make an idea tourist route for walking and cycling.	For the New railway line as proposed there is no evidence that this proposal is feasible. Other comments noted - local plan issues.	No change to NSF
ANON-3C85-CA6U-J	Resident	Norfolk suffered particularly badly in the railway cuts of the 20th Century (Beeching 'Axe'). What are you going to do to press for reopening of railway routes if as you state in the document you are "effecting a major shift in travel away from car use"? I have personally witnessed the parking crisis where the experience of visiting any Norfolk town is let down by the enormous number of motor cars clogging up the streets. There are no places left to park. So I take the bus, but public transport is woefully inadequate and it does not connect with the rail services, particularly in North Norfolk e.g. at Cromer and North Walsham stations.	Noted. Local Transport Plan issue	No change to NSF
BHLF-3C85-CA6D-1	Middleton Parish Council	The Council generally felt that the Framework is very well thought out and tries to consider all aspects that can affect growth and development within Norfolk with a positive approach. However, there appears to be a lack of consideration or investment in the growing use of the A47 between Norwich and Kings Lynn. The improvement of the Hardwick junction only will not deal with the additional traffic using the A47 or the holiday traffic going to Hunstanton which blocks the junction every year.	Support welcomed. A47 improvements are supported by all the authorities (through A47 alliance) and will be specified in new transport agreement.	A47 to be considered in transport agreement in future version of the NSF
ANON-3C85-CA62-F	Resident	Under "Improvements Needed", you list "Norwich Western Link". This should be removed. It would complete the encircling of Norwich with roads and concrete and would sever cycling routes out of the west of the city and cause severe damage to the Wensum & Tud valleys and surrounding areas. Building a "Norwich Western Link" would have a further negative effect on the quality of life for city residents and is in complete opposition to the stated aims of "locating development so as to reduce the need to travel" and "effecting a major shift in travel away from car use towards public transport, walking and cycling". With limited budgets, money should be diverted from the road projects listed to railway improvements, otherwise the car will continue to dominate Norfolk at the expense of public transport. Figure 11 illustrates how Norwich is being cut off from surrounding green spaces. There are several "Accessible Nature Sites" just north of the city but the route of the NDR and the spread of Housing Allocations around its route block off access by cycle from the city to these sites.	The Norwich Western Link is a County Council priority and supported by the local planning authorities. The design of any scheme will need to take account of the needs of cyclists and the local environment.	Norwich western link to be considered in transport agreement in future version of the NSF
ANON-3C85-CAJF-Q	Resident	The analysis of current infrastructure makes no reference to the planned worsening of the Fen Line rail service to and from Norfolk nor the A17 main road linking Norfolk to the North Midlands and North of England. These are major deficiencies in the analysis and therefore the conclusions and actions do not accord to the full current situation.	While any deterioration of service is regretted it doesn't alter the overall approach to the NSF however mention of the A17 is included in section 3	Mention of the A17 is included in section 3
ANON-3C85-CAJF-Q	Resident	Local Buses: The generalised outcomes of the framework agreement between local planning authorities, either deliberately or otherwise, puts local bus use at the forefront of its vision to create housing and jobs growth but without consequential private car use growth. If bus use is to grow then the bus network has to be dependable, stable and attractive, and that it is not. The document does not address the issue of intervening in the market under the 2000, 2008 or 2017 Acts (yet implicitly rejects the much more limited interventions available under the 1985 Act) and unless it does so, then the vision will not, and cannot, be delivered. This is a massive failure to link inputs with outcomes and undermines the credibility of the document, probably more than any other omission. Local Buses: The analysis is deficient in that it does not use available data as a basis for the work as travel data is available to local authorities under the 2008 Local Transport Act and cannot be denied it by bus operators as if commercially confidential, and indeed that clause of the Act was specifically to enable high level strategic planning such as this document. The narrative needs rewritten based on the available evidence base rather than a series of generalised assumptions. Local Buses: Reference is made to Community Transport, implying that it will be a potential way ahead for rural transport provision. Yet in late July 2017 the Department for Transport issued a "re-interpretation" of the 1985 Act (to be consulted on this Autumn) which may end the use of community transport as a provider of rural bus services. This has the potential to cause significant social and economic detriment in a rural county such as Norfolk.	Noted, detail is a matter for Local Transport Plan	No change to NSF

ANON-3C85-CAJF-Q	Resident	<p>Rail: The narrative inaccurately describes the London to King's Lynn service currently as half hourly at peaks. It is not so in the afternoon peak, not at all from Cambridge northwards and from London the half hourly service is from 17.44 to 19.44, largely post-peak. This leads to severe overcrowding on the Fen Line north of Cambridge which is not considered in the document nor any agreement made to address it.</p> <p>Rail: The narrative is out of date in that train seat capacity on the Fen Line has been deliberately reduced from May 2017 by the allocation of newer stock, reducing seats from approx. 245 to 210 per train. This has significantly worsened peak hour overcrowding (ie beyond standing capacity) on Fen Line trains North from Cambridge during its afternoon journey from work peak.</p> <p>Rail: Journey times to other towns off the rail network are considered (Figure 4 of NSFTT) as rail plus car overall time. The analysis does not include either the variable locations of car parking facilities around the King's Lynn gyratory nor the closure of ticket office facilities at that station recently, the combined effect of which is that, for example, from Hunstanton, the road journey time at 30 minutes is grotesquely understated compared with reality - most people would allow that for the road travel journey plus the same again for the variability of where in the town to find car parking plus the variability of queue time to buy a ticket (including from the vending machines when the office is closed). This therefore understates the extent of isolation from the national network suffered by some of these towns and therefore enables the planning authorities to avoid making any agreements on the extent to which there is a case for land protection for possible new rail lines as the population and local economy both grow, bringing with them an exponential rise in the demand for travel (despite the lofty ideals of the plan to reduce it).</p> <p>Rail: The NSFTT SWOT analysis at Figure 5 includes no reference to the inadequacy of capacity on the Fen Line nor the planned downgrading of other aspects of the Fen Line service from December 2018 as threats, nor the opportunities that arise from putting this growing list of deficiencies on this line right. Outcomes and policies emerging from the SWOT analysis will therefore be deficient and this needs rectifying.</p> <p>Rail: Footnote 52 indicates a rail journey time from King's Lynn to Cambridge of 45 minutes. That it used to be but currently it is 48 minutes and planned to increase to just under 1 hour from 2018. This is considerable worsening that will depress demand for rail and economic growth and create modal transfer towards car in total contravention of the lofty ideals of the framework document. Yet the document is silent on this.</p>	While any deterioration of service is regretted it doesn't alter the overall approach to the NSF, the detail will be considered through the Local Transport Plan	No change to NSF
ANON-3C85-CAJF-Q	Resident	<p>Roads: as noted above, there is no recognition of the A17 as an important road for the county's business success, even though all but the first seven miles lies beyond the County boundary. This needs to be put right in the document and in doing so consideration given to the complete inadequacy of the road capacity for current, let alone future demand.</p> <p>Roads: it is noted in the supporting evidence (NSFTT, Figure 2) that average speed comparisons on trunk roads exclude A17 and A47 West from King's Lynn yet these are important to the county's connectivity. Average speeds in West Norfolk are below the rest of the county and yet very little strategic improvement (as different from individual local schemes) is focused on this area. This is a failing of the document and should be addressed.</p> <p>Roads: It is noted in the supporting evidence (NSFTT) that there are 2 congestion hotspots in West Norfolk and only one in a selection of a few other towns and cities (for example just one in Norwich). Yet the road network development plans focus on further infrastructure investment mostly excluding West Norfolk. If the funding does not follow the evidence trail then there is little purpose in writing and working to the document and the planning authorities should reconsider and rebalance this proposed</p>	Noted, detail is a matter for Local Transport Plan	Mention of the A17 is included in section 3
ANON-3C85-CAJF-Q	Resident	<p>Air Quality: quality issues in Norwich and King's Lynn are noted. In Norwich one central area is pinpointed and an action plan in development to address it. In King's Lynn there are two areas of concern (including the suburb of Gaywood) and plans are currently under consideration that have the potential to worsen it in other residential areas as well (the opening of part, and then all of Harding's Way to all traffic) so that the worst air quality in the county will be in King's Lynn. Yet the document proposes no action plan to address it. This needs to be amended and a commitment to urgently developing a plan to deal with it. Further, it makes the case for a general agreement across the authorities to not proceed with any plans that will knowingly worsen air quality.</p>	Air quality management areas are not strategic cross boundary issues	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	<p>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.</p>	These are the projects that have been put forward through the infrastructure delivery plan, additional projects can be considered in future versions of the NSF and IDP.	No change to NSF
BHLF-3C85-CA69-P	Snettisham Parish Council	<p>This focus on the County Town is also reflected in comments about roads. The prosperity of the region depends on getting goods and services into the County, yet, again, all road spending is focused in the East. Kings Lynn is now a bottleneck all year round, not just during the holiday season. Tourism is one of Norfolk's biggest sources of income, yet we are now hearing people saying they will not come again due to the delays on the roads – not the ones in the immediate environs of resorts, which may be expected, but those en route. This is before 1,000 houses, which have been given planning permission in just the last three years, are added on the A149 alone.</p>	Noted the schemes reflect the needs identified by the transport authorities in consultation with the district councils.	No change to NSF
BHLF-3C85-CA6H-5	Melton Constable Trust	<p>I write on behalf of the Melton Constable Trust which for many years has been actively pursuing the prospect of bringing back regular rail services to places such as Dereham, Fakenham and Holt by use of the existing heritage lines and existing Network Rail routes. To this end we have commissioned feasibility studies and purchased land at both Holt and Fakenham. As has been shown elsewhere in the country, we believe that this could make a massive contribution to the local economy, help address road congestion, be a further boost to tourism and help tackle rural isolation.</p> <p>To this end can we please suggest that there is a positive reference in the document to continuing support for the Bittern and Wherry lines and support in principle for the reconnection to the main network to Dereham, Fakenham and Holt ?</p>	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	<p>2 In this context, the failure to understand and recognise the transport infrastructure shortcomings in West Norfolk is disappointing. The A17, the major link from Norfolk to the North of England, is not mentioned once in the document, and there is scant comment on any shortcomings on the A10 from King's Lynn to Cambridge (save for the fact that Cambridgeshire County Council is studying what to do in its section of this road) nor the A47 West from King's Lynn to Peterborough and the A1. Additionally, whilst much is made of the rail investment in the County by Abellio nothing is said of the continual downgrading of service by Great Northern on the Fen Line serving West Norfolk. The NSF therefore needs major rewriting to recognise the very different transport infrastructure shortcomings and needs in the West of the county to ensure that its population and economic development are not 'left behind'.</p>	Noted the schemes reflect the needs identified by the transport authorities in consultation with the district councils. While any deterioration of train service is regretted it doesn't alter the overall approach to the NSF.	Mention of the A17 is included in section 3
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	<p>11 Transportation - servicing new developments: the NSF is largely silent on this issue, except to note that planning authorities have no legal right to require minimum broadband speeds to be delivered to new developments. It is possible, through a raft of available interventions, however, to intervene when new developments are planned, to provide appropriate local bus services which accord with the NSF Vision and Objectives. These can be by using the Acts noted above, or at a smaller scale by Section 106 or 272 agreements with developers, or through a CIL or development Levy. The NSF must be more explicit about these, how authorities would intend to use them, and include a template (section 106 for example) agreement, so that businesses and developers can have certainty that these interventions will be used and the outcomes of the intervention</p>	These are not matters for the NSF as they are not strategic cross boundary issues	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	<p>10 Transportation - local buses: the NSF Vision and Objectives makes the clear desire and commitment to improve connectivity between where people live and where they work and use other facilities (such as retail and education) and to create a modal shift from car towards public transport, cycling and walking. The major component of this shift is to ensure that the local bus service meets this vision and objective so that they are deliverable. But local bus services are privately provided and business owners have clear legal objectives to maximise shareholder value, not community or society value. As a result, the vision cannot be delivered without interventions in the free market. These interventions are permissible in Acts enacted in 1985, 2000, 2008 and 2017, and each Act has made it easier for the transportation authority (NCC) to intervene than the previous one. For the NSF Objectives and Vision to be fully realised, and the county's population and economy to reach their full potential, the NSF must actively discuss and make agreements on how, not whether, it will intervene, and to show how the intervention will meet the Vision and Objectives of the document. Leaving it to the market, as now, will no longer be an appropriate solution.</p>	Noted, detail is a matter for Local Transport Plan	No change to NSF

ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	9 Transportation - rail: the NSF narrative applauds the growth in rail passengers and the investment made and to be made in line upgrades and new stock in the new Greater Anglia franchise. We welcome these investments. However, they are in stark contrast to the decline apparent on the Fen Line in West Norfolk, a line with a recent past passenger growth rate above that in Greater Anglia and the national average and yet which has (a) had lower capacity trains put on the route in May 2017 and (b) faces a planned significant slowing down of journey times from December 2018. This has resulted in grotesque overcrowding North from Cambridge during its afternoon peak travel time and will result in the franchise requirement set by the Department for Transport not being complied with in terms of maximum journey times from next year. Yet the NSF makes no reference to these downgradings, nor the fact that the December 2018 timetable fails to meet the rail industry's objectives for half hourly afternoon peak travel time trains from next year (let alone its failure to meet the franchise requirement of daytime half hourly trains from 2017). The NSF must be rewritten to be more robust in its commitment to work tirelessly with the rail industry to put right these failings as priority two (after Norwich in Ninety is delivered) and before aspirational new links are implemented such as Norwich to Stansted Airport direct services.	While any deterioration of service is regretted it doesn't alter the overall approach to the NSF	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	8 Transportation - air quality: two areas of air quality concern are noted in the NSF, one in central Norwich for which there are plans to address the issue and the other in the King's Lynn town centre stretching out to the suburb of Gaywood for which no plan is included to address the issue. The NSF must be rewritten to include a commitment to addressing this issue at an early date. Indeed, to the contrary, West Norfolk is considering opening to all traffic King's Lynn's only bus priority road, which will potentially significantly worsen the air quality in South Lynn, thereby widening the area in which there is traffic generated health concern.	Air quality management areas are not strategic cross boundary issues	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	7 Transportation - roads: we have noted above the failure to properly assess the shortcomings and future needs of the infrastructure in West Norfolk, and ask that the NSF is rewritten to provide a proper and fair balance of investment, given the historic lack of investment in this part of the county. We note from the accompanying NSFTT document that (a) average road traffic speeds are lower in West Norfolk than the county or national average and (b) that there are two recognised congestion hotspots in West Norfolk compared with three for the rest of the county including only one in Norwich. We are concerned that both these features depress economic activity and business investment and also note that the NSF includes no plans to deal with these West Norfolk issues. We therefore believe there is a compelling case for the NSF to be substantially rewritten in respect of road investments	Noted, detail is a matter for Local Transport Plan	No change to NSF
BHLF-3C85-CA3J-4	The Somerleyton Estate	In section 7.7 'Transportation' in Table 12 the Framework lists a number of priority road projects for promotion. The Somerleyton Estate support the inclusion of the Great Yarmouth third river crossing and the A47 Acle Straight Dualling but, reflecting our comments above, such projects need to be considered alongside initiatives to support town centres such as Great Yarmouth so that footfall is directed into them rather than away to out of town retail parks.	Noted	No change to NSF
BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	Statistics reveal that the north of the County is almost totally dependent on road-based travel for most journeys – and yet there is only limited evidence / published data available to support transport assessments. Consequently the evaluation of impacts relies on developer submissions intended to support development proposals. Can the NSF provide background information on road traffic flows and forecasts of traffic growth? This is a particular issue along the A149 Coast Road which suffers massive fluctuations in seasonal traffic and is destined for significant housing growth in the Hunstanton area - a clear obstacle to those wishing to access employment opportunities along this route and especially in the larger towns (maybe developers could fund the costs of an independently developed transport model or CIL could be hypothecated to pay for this?)	Noted, these are matters for the Local Transport Plan or local plans.	No change to NSF
ANON-3C85-CA3V-G	Resident	With regard public transport, the downside of improving rail services from Norwich is an inevitable increase in car journeys into Norwich to connect with those services. The Bittern line (more than Yarmouth and Lowestoft where there is the facility to get to London more readily without going to Norwich) will currently be saving many car trips into Norwich daily by those going to London (and the Midlands). It is frustrating that other towns with similar needs, notably Fakenham and Dereham, have no corresponding facility and, whilst recognising the likely difficulty of restoring rail services to them, I would like to see the strategy at least acknowledging that possibility and the need to assess viability (and the possible consequences).	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CA3T-E	Norfolk Orbital Railway	I am interested in reinstating 'some' redundant railway routes in Norfolk, in particular the Fakenham to Dereham route with longer term aspirations to get from Fakenham to Holt creating the Orbital route: http://norfolk-orbital-railway.co.uk/say-norfolks-shared-vision-development-including-transport/ Have your say on Norfolk's shared vision for development including Transport... Norfolk councils are asking residents for their views on a joint vision for the county's future to 2036 and beyo... A site for a railway station at Fakenham is with North Norfolk District Council, please scroll down to 2a Fakenham. the area in yellow towards the bottom of the map is the protected railway route : https://www.north-norfolk.gov.uk/tasks/planning-policy/view-proposals-map/ The route from Fakenham to County School where the Mid Norfolk Railway runs to the mainline at Wymondham is protected at Norfolk County Council level: Safeguarding Land for Sustainable Transport Uses 3.5.22 The likely availability and use of public transport is a very important element in determining planning policies designed to reduce the need for travel by car. To this end, national policy requires local planning authorities to explore the potential, and identify any proposals, for improving public transport by rail, including the re-opening of rail lines. Such routes could also provide walking and cycle routes as an interim measure prior to the introduction of rail services. 3.5.23 Whilst the Government recognises that road transport is likely to remain the principal mode for many freight movements, it considers that planning policies can help to promote more sustainable distribution, including where feasible, the movement of freight by rail and water. Accordingly, it also requires local planning authorities to identify and, where appropriate, protect sites and routes, both existing and potential, which could be critical in developing infrastructure for the movement of freight (such as freight interchange facilities allowing road to rail transfer). 3.5.24 A potential link between the privately-run North Norfolk Railway and the national network across Station Road in Sheringham is protected. Such a scheme could enable railway services to operate between the outskirts of Holt and Norwich and would provide for a longer platform and improved customer facilities at Sheringham Station. Although the scheme is not identified in the Norfolk Local Transport Plan 2006-11, it would provide tourism as well as transport benefits. 3.5.25 The current Norfolk Railfreight Strategy promotes the re-use of the former rail corridor linking Fakenham with the Mid-Norfolk Railway at County School in Breckland District and beyond for both rail-passenger and rail-freight transport use. The route of this corridor insofar as it relates to North Norfolk District is protected from prejudicial development. The Norfolk Railfreight Strategy identifies sites in Cromer, Fakenham, Great Ryburgh, Hoveton and North Walsham where it wishes land to be safeguarded for use as rail-freight terminals through planning policy; the sites at Fakenham and Great Ryburgh being dependent on the previously mentioned reinstatement of the railway line between Fakenham and County School. Only the site at North Walsham, presently operates as a freight terminal. The land at Hoveton has more recently been taken off the protected list due to poor road access to the site and lack of facilities. Therefore this land is not protected by planning policy. Policy CT 7 Safeguarding Land for Sustainable Transport Uses Former railway trackbeds, and other railway land will be protected from development that would be prejudicial to the re-use of railway, or sustainable transport links and facilities in the following locations:	Noted	No change to NSF
BHLF-3C85-CA3E-Y	Resident	I wish to support the submission by the Melton Constable Trust. The reinstatement of rail services must surely be a priority . It will help reduce pollution and the movement of freight by rail would reduce the number of heavy vehicles. Not everyone has a car and rail access would bring great benefit to them , Other areas have begun to reinstate long lost rail services with great success and Norfolk should follow. A large rural county with so little rail access is surely not acceptable in this day and age.	Noted	No change to NSF
BHLF-3C85-CA3D-X	Other	Although I'm not resident in Norfolk I regularly visit the county and would like to visit more, but struggle to get to even the larger market towns as I am a non-driver. I would argue that Norfolk lost a disproportionate number of its railway lines under the Beeching cuts and consideration should be given to re-instating a number of these, particularly to towns like Fakenham and Melton Constable. I would suggest that offering greater connectivity, by rail, would significantly boost economic activity in the county.	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF

ANON-3C85-CA37-H	Other	<p>When ever I use the Bittern line I'm always impressed by how popular it is. But I can remember when it came close to being closed. I'd like to see continued support for the local rail services.</p> <p>I also think that, in light of ever increasing road congestion,that more support should be given to proposals to reinstate closed railways, like the orbital project and the link to Hunstanton. I know such things are expensive but I believe that every railway reopened has been more popular, and created more value, than expected.</p>	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	<p>One of the first local issues to be tackled by the Wroxham and Hoveton Joint Action Group is the increasing problem of traffic congestion on the A1151. This heavily-used main road runs through Hoveton and Wroxham; with a recent study carried out by Wroxham Parish Council showing half a million vehicle movements passing through the two villages in just over two months. There are many practical problems posed by such congestion – queues of traffic causing long delays in entering and leaving the villages, particularly at peak times (work commutes/school runs) and over the holiday season; difficulties for local residents in joining the main road traffic from driveways and residential roads; delays experienced by emergency vehicles, etc – but of particular concern is the noise and air pollution resulting from this level of traffic, which will have a serious impact on local quality of life. Hoveton Parish Council feels that further housing development in either village will only add to the already unacceptable congestion on the A1151, and will therefore further erode quality of life for local residents.</p>	Noted, this is a mater for local plans.	No change to NSF
BHLF-3C85-CA3W-H	Hoveton Parish Council	<p>As noted in its comments on Section 5, Hoveton Parish Council believes there is a need for the provision of local jobs in order for the local economy to thrive. It therefore agrees with proposals to ensure effective and sustainable digital connections and transport infrastructure between and within settlements, and to support employment allocations that minimise travel distance and maximise the use of sustainable transport modes, both of which would hopefully help to alleviate problems with local traffic congestion. There is also a demonstrable need for further investment in local road maintenance and ensuring that heavily-used roads such as the A1151 are fit for purpose.</p>	Noted	No change to NSF
ANON-3C85-CA3C-W	Resident	<p>As highlight in this paper, many upgrades are needed to the road network in Norfolk. The A47 upgrades will inevitably bring more traffic onto the A47 which, at peak times, is already congested. Putting in place new rail connections will ease the pressure on the road network, as well as providing a greener and more reliable transport link. For example a links between Fakenham and Norwich, and Dereham and Norwich would prove undoubtedly beneficial (and potentially viable).</p>	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	<p>Te single carriage way road network serving most of the county is one of the key characteristics that make Norfolk so unspoilt and attractive both to residents and tourists. This should be approach creatively with much more consideration given than in the past through:</p> <p>a) trip reduction through planning for greater settlement self containment b) a multi modal movement proposition including the reinstatement of local rail c) land release to support multi modal and sustainable movement.</p> <p>A critical feature of Norfolk's geography is the very strong pull Norwich exerts on its extended hinterland to service jobs, culture , education and shopping. This is also relatively predictable in terms of timings - its has been characterised as a tidal flow morning and evening by planning officers. This offers an almost unique opportunity for Norwich - over other UK cities - to reinstate its local rail network as a key element of a sustainable movement provision.</p> <p>The list of key infrastructures fails to address this key opportunity. This should be rectified - not least in order to support the forms of sustainable growth sketched in the document as the aim of the growth strategy.</p> <p>We suggest the following should be considered included:</p> <ul style="list-style-type: none"> - improvement in the frequency/capacity of the Bittern Line - tram/train connection between Norwich Business Park and Norwich Airport - reinstatement of the Marriott Way as either a light rail connection - investigation feasibility of connecting Marriott Way route to UEA and NNUH - Consideration of local rail connections between Wymondham and NNUH/UEA - North Norfolk Circular route - institution of rail based park and rides across the proposed local rail network <p>Furthermore the list of infrastructure aspirations does not include the improvement of the Norwich-Cambridge rail connection. (While it does mention the Oxford-Cambridge connection- which has little or no bearing on Norfolk). This should be brought forward as a key priority servicing a potential step change in the economic potential of the County. All other movement priorities should be tested against the question of whether they enhance multi modal and sustainable movement and place competitiveness on a 21st C not 20th C movement model. The funding model for infrastructure that is directly related to development should be reviewed against the alternative SLiIM business model which we have referred to previously which could potentially work in parallel to create long term value and returns. We would like to interrogate the background paper that is refrrd to below:</p> <p>"Furthermore, the background paper produced identified three key strategic issues affecting the County including: the relatively poor transport connectivity between our main settlements and destinations outside Norfolk resulting in long journey times; the poor connectivity within the County particularly for east-west journeys, exacerbated by congestion and unreliable journey times on parts of the network (especially the A47) adding to business costs; and difficulties in delivering major enhancements to transport networks within our urban areas and market towns which tend to have historical street patterns where the scope for major improvements is limited." the report upon which this is based seems to make a fundamental mistake in iots assessment of the specific qualities of Norfolk its geogranhvy and in its over-emphasis on connection</p>	The majority of the schemes mentioned are matter for the Norwich Area Transport Strategy and the Greater Norwich Local Plan, there is currently no evidence that a Circular railway route is economically feasible for regular rail services. Norwich to Cambridge service improvement is a priority and this should be clarified in the NSF.	Mention of Norwich to Cambridge line improvements mentioned in section 3
ANON-3C85-CAC4-X	Stalham Town Council	<p>In order to effect a major shift in travel away from the car towards public transport, then this needs to be greatly improved in North Norfolk. The lack of railway stations in North Norfolk does not help. Also, as mentioned in Section 1, a bus service that goes direct to Norwich Railway Station from Stalham would be of great benefit to the area. Drainage of the roads needs to be improved to prevent continuous flooding when there are heavy rainfalls.</p> <p>At present Norwich Airport provides a very limited service for Norfolk to other European countries, so I would suggest it would definitely benefit the county if this was greatly improved in the very near future.</p>	Noted but these are not issues the NSF is able to address	No change to NSF

BHLF-3C85-CACX-2	Other	<p>Please note that bringing back old train routes has now become popular in many parts of UK (chiefly for commuting and/or freight, not just heritage or tourism purposes).</p> <p>Please urgently view these websites:- a) https://www.change.org/p/government-reinstate-train-line-from-king-s-lynn-to-hunstanton?utm_campaign=fb_dialog&utm_medium=email&utm_source=signature_receipt#_=_ b) http://www.freightonrail.org.uk/ c) http://www.heritagetrains.com/index.php</p> <p>Action needs to be taken before new houses are built on these railway routes</p> <p>Please convey our thoughts to your decision makers</p> <p>If there is to be an East Anglian Powerhouse then our area should get equivalent government money:- to that being planned for the Northern Powerhouse to link Leeds with Manchester across the Pennines.</p> <p>We already have (thanks to forward-thinkers of the early 20th century) superb railway routes East- West in Essex and also across Norfolk.</p> <p>Why, for lorry traffic, waste funds dualling parts of the A47 causing clogging and new jams due to excess speed and essential new roundabouts?</p> <p>Such money should be spent on re-opening the East West lines for agricultural freight as well as for passengers.</p> <p>The rail lines never should have been closed.</p> <p>Such important very-much growing towns as Braintree (not far from Stansted), some suffolk towns, Kings Lynn, Dereham, Hunstanton have been cut off, and the opportunities for cheaper transit of sugar beet etc, and passengers lost for no good reason.</p> <p>There are similar east west tracks which could be opened on the Lincolnshire Fens to the east of Peterborough, where people have lobbied in vain for commuter "stops" to be re-opened.</p> <p>As at Narborough next to the main east west route being built on by Persimmon next to the railway line.</p>	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
ANON-3C85-CACY-3	Resident	I would like to see a comprehensive review of the route hierarchy undertaken, that properly addresses the impact of HGV's and other large vehicles (including agricultural) on our village roads which are simply not able to cope with such traffic. Residents whether they live in a village or town, should not have to put up with vehicles mounting pavements, excessive noise because the road infrastructure is inadequate.	Noted, these are matters for the Local Transport Plan or local plans.	No change to NSF
BHLF-3C85-CACQ-U	Historic England	There are a number of major transport infrastructure projects on-going or upcoming within Norfolk. These are large projects, the details of which cannot be adequately considered here. We support a cross boundary strategic level consideration of transport infrastructure and look forward to being involved in specific proposals as they progress. All proposed transport infrastructure schemes and route options should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.	Noted	No change to NSF
BHLF-3C85-CAC9-3	Resident	<p>With reference to your consultation on Norfolk's strategic development, I would like to point out that Norfolk needs railways, principally those which it used to have. Large towns are left without connection to the national network. It is ridiculous that there is no connection between King's Lynn and Norwich. Market towns such as Dereham and Fakenham now have no national connection. The Norfolk Orbital Railway offers a solution to the latter problem, and I would urge you to include them in your consultations.</p> <p>As to the former, there seems no particular reason why Network Rail should not be coerced into rebuilding the line from March to Lynn.</p> <p>It should also be considered whether there are places which were never served by railways which could now, because of increased housing, industry or tourism, benefit from railway access.</p>	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CACH-J	Other	<p>The levels of vehicle traffic seem to be growing alarmingly all over the county, and, indeed, over the country. There can be traffic jams and gridlock at any time, anywhere, and this is a really worrying trend. Congestion on this scale is simply a complete waste of time & resources, as well as a major contributor to air pollution. It is vital that we take action NOW to persuade people out of their cars for both business & leisure, and reduce greatly the use of road vehicles for "distribution".</p> <p>Therefore the NSF should quickly decide on urgent measures to deal with the over-use of motor vehicles, with a many-pronged attack, eg park and ride (at sensible times and fares, not just stopping at 18.00), and improving all transport routes and capacity, (over-crowded 2-car trains, or buses crawling through rush-hour towns on busy routes are not an encouragement for people to leave their vehicles at home).</p> <p>I also urge you to look most seriously and in detail at the Norfolk Orbital Railway which could be an excellent way of transporting tourists, and possibly goods, and could be linked into a coherent integrated county wide park-and-ride scheme.</p>	Noted, these are matters for the Local Transport Plan or local plans. There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CAC5-Y	Norfolk County Council	<p>Under 'Current Network' the text says 'The A47 continues as the A12 trunk road from Great Yarmouth to Lowestoft'. Highways England have recently resigned this section of road as A47.</p> <p>The document could make reference to development and improvement of the Major Road Network (MRN) following the announcement from Dft to invest monies from road fund duty. (There are no specific schemes identified but we expect to be asked for funding bids within the next 12 months).</p>	All references to A12 are updated in the NSF.	NSF Updated
BHLF-3C85-CACK-N	Hoveton Parish Council	One of the first local issues to be tackled by the Wroxham and Hoveton Joint Action Group is the increasing problem of traffic congestion on the A1151. This heavily-used main road runs through Hoveton and Wroxham; with a recent study carried out by Wroxham Parish Council showing half a million vehicle movements passing through the two villages in just over two months. There are many practical problems posed by such congestion – queues of traffic causing long delays in entering and leaving the villages, particularly at peak times (work commutes/school runs) and over the holiday season; difficulties for local residents in joining the main road traffic from driveways and residential roads; delays experienced by emergency vehicles, etc – but of particular concern is the noise and air pollution resulting from this level of traffic, which will have a serious impact on local quality of life. Hoveton Parish Council feels that further housing development in either village will only add to the already unacceptable congestion on the A1151, and will therefore further erode quality of life for local residents. As noted in its comments on Section 5, Hoveton Parish Council believes there is a need for the provision of local jobs in order for the local economy to thrive. It therefore agrees with proposals to ensure effective and sustainable digital connections and transport infrastructure between and within settlements, and to support employment allocations that minimise travel distance and maximise the use of sustainable transport modes, both of which would hopefully help to alleviate problems with local traffic congestion. There is also a demonstrable need for further investment in local road maintenance and ensuring that heavily-used roads such as the A1151 are fit for purpose.	Noted, these are matters for the Local Transport Plan or local plans.	No change to NSF

BHLF-3C85-CAJD-N	Resident	<p>The Transport Constraints paper</p> <p>There is too much emphasis on transport improvements being about heavy infrastructure and little if anything about 'lighter touches'. These include:</p> <ul style="list-style-type: none"> •Cycle networks – you admit that “Networks have not been identified in most of the market towns and no audit of cycle provision has been undertaken”. But you do not say why not! •Traffic reduction •Travel Plans <p>The policy context is now totally different to a few decades ago when new and improved roads were seen as the answer to traffic congestion. Now it is widely accepted that traffic expands to fill the available capacity and that you cannot build your way out of congestion. The case for sustainable travel and less travel is now generally accepted, yet your paper does not seem to recognise that. The facts are straightforward:</p> <ul style="list-style-type: none"> •There is too much traffic. •Air quality is poor in places. The UK has had illegal air pollution in many places since 2010 and the government keeps being taken to court. This negligent attitude alone should herald urgent policies of traffic reduction. •Road casualties are not reducing since 2011. •Carbon dioxide levels are not falling enough, and transport is the reason. <p>So the messages are loud and clear. You need a totally different approach and a pro-active one featuring Travel Plans, Park and Ride, cycle networks, car sharing, high quality bus services. I'm afraid your approach seems out of date.</p> <p>The paper could usefully refer to the county council's Transport Plan for 2036 ('Connecting Norfolk') and also what progress has been made on it since 2011.</p>	Noted, these are matters for the Local Transport Plan or local plans.	No change to NSF
BHLF-3C85-CA6D-1	Middleton Parish Council	<p>The Council generally felt that the Framework is very well thought out and tries to consider all aspects that can affect growth and development within Norfolk with a positive approach. However, there appears to be a lack of consideration or investment in the growing use of the A47 between Norwich and Kings Lynn. The improvement of the Hardwick junction only will not deal with the additional traffic using the A47 or the holiday traffic going to Hunstanton which blocks the junction every year.</p>	Support welcomed, the A47 is a priority and will be considered in a new transport agreement, the issues around the Hardwick junction are scheme specific or relate to the local transport plan.	A47 to be considered in transport agreement in future version of the NSF
ANON-3C85-CA62-F	Resident	<p>2. The document does not contain any means of encouraging or improving public transport, cycling or walking. This is a wasted opportunity.</p>	There are largely local issues although their role will be considered in a new transport agreement	Public transport, cycling and walking to be considered in transport agreement in future version of the NSF
BHLF-3C85-CACP-T	Melton Constable Trust	<p>I write as a supporter of the Melton Constable Trust which for many years has been actively pursuing the prospect of bringing back regular rail services to places such as Dereham, Fakenham and Holt by use of the existing heritage lines and existing Network Rail routes. To this end it has commissioned feasibility studies and purchased land at both Holt and Fakenham. As has been shown elsewhere in the country, it believes that this could make a massive contribution to the local economy, help address road congestion, be a further boost to tourism and help tackle rural isolation.</p> <p>To this end I would urge that you make a positive reference in the document to continuing support for the Bittern and Wherry lines; and support in principle for the reconnection to the main network to Dereham, Fakenham and Holt.</p> <p>The technical feasibility of the proposed Wroxham and Hoveton line from a technical point of view is not in question.</p>	The role of the Bittern and Wherry lines will be considered in the new transport agreement. There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	Bittern and Wherry lines to be considered in transport agreement in future version of the NSF
BHLF-3C85-CAC3-W	Other	<p>Where Norfolk needs to focus is I believe mainly on transport. Please consider rail, in particular the heritage rail experiences offered by your three main railways all of which have a vision for the future that is progressing at only a snails pace. More should be done.</p> <p>Something also has to be done about the rail pinch points due to old bridges on the Norwich main line to London</p> <p>My second request is to ask for bypasses for some of the smallest most traffic jammed villages which spoil everyones experience of your great county. Cley being a case in point where this year I twice spent 30 minutes stuck in jams.</p> <p>My final request is the desire for more off road cycle paths. If only the wonderful north norfolk coastal path would also allow bikes it would add to tourism significantly. It is an underused resource that should have a wider group of users.</p>	Noted. Matter for the Local Transport Plan	No change to NSF
BHLF-3C85-CACE-F	Resident	<p>In view of the unstoppable growth of motor traffic in the County, I consider it essential to undo the mistakes of the 60's by protecting and improving the rail lines we still have, where possible reopening lines and stations to market towns which have been closed, and using lines for freight where such use has been discontinued. As such I applaud the efforts of the Norfolk Orbital Railway and the Melton Constable Trust and ask that all the former lines and accesses be protected against development so that such a circle is possible, probably not in my lifetime but we must plan for the Future when the oil runs out and abandon short-termism which is the bane of our Country.</p>	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
ANON-3C85-CA31-B	Wroxham Parish Council	<p>One of the first local issues to be discussed by the Wroxham and Hoveton Joint Action Group is the increasing problem of traffic congestion on the A1151. This heavily-used main road runs through Hoveton and Wroxham. A recent study carried out by Wroxham Parish Council recorded half a million vehicle movements passing through the two villages in just over two months. There are many practical problems posed by such congestion – queues of traffic causing long delays in entering and leaving the villages, particularly at peak times and over the holiday season, when the northbound queues regularly stretch several miles towards Norwich; difficulties for local residents in joining the main road traffic from driveways and residential roads; delays experienced by emergency vehicles, etc – but of particular concern is the noise and air pollution resulting from this level of traffic, which will have a serious impact on local quality of life. This is regularly brought to the attention of Wroxham Parish Council by Parishioners.</p>	Noted. Matter for the Local Transport Plan	No change to NSF
BHLF-3C85-CACJ-M	Tunstead Parish Council	<p>Also of concern are the road network and support for rural communities and rural services.</p>	Noted	No change to NSF
BHLF-3C85-CACC-D	South Norfolk Council	<p>Transport – Table 12</p> <p>For the avoidance of doubt, Table 12 should be amended to say “A140 Long Stratton bypass (including Hempnall Crossroads improvements)” to reflect the fact that the crossroads improvements are considered by the council (as reflected in the Long Stratton Area Action Plan) as an integral part of the Long Stratton bypass project.</p>	NSF updated to include Hempnall scheme	NSF updated
ANON-3C85-CA6U-J	Resident	<p>Please see comments for Section 7. Norfolk has enormous potential for railway reopening as not many miles of the "lost routes".</p>	There is currently no evidence that opening these railway lines is economically feasible for regular rail services.	No change to NSF
BHLF-3C85-CA6K-8	Hunstanton & District Civic Society	<p>Also under Section 7 - Infrastructure - It is essential to preserve through routes that have become redundant for their original use, ie rail track beds, canals, so that they can be used as footpaths, cycleways or possibly for re-instatement as public transport routes. There is a strong likelihood that the rail link between March and Wisbech will be reopened for passenger traffic. It is perverse that the former trackbed from Magdalen Road / Watlington to Wisbech has lost its protection because it could be developed into a through route at some time in the future.</p>	Noted. Each route is a matter for the Local Plan	No change to NSF

ANON-3C85-CA31-B	Wroxham Parish Council	<p>It seems inevitable that too much development will seriously harm the rural character of the local area. Wroxham Parish Council feels the fragile coastal, Broads and rural environment must be retained if it is to contribute to a strong and valuable tourist industry.</p> <p>However we are mindful of the growth imperatives and targets of the Greater Norwich Growth Board (or it's successor) which will have a significant effect on our community and limited infrastructure. The Council feels that Wroxham, as it is structured today, cannot sustain continued development. A by-pass, as referred to in section 5, would not only alleviate the terrible traffic congestion and air pollution issues but also open up significant housing development opportunities throughout the by-pass corridor. It is unlikely that such a by-pass would start or finish in the parishes of Wroxham or Hoveton but significant social, economic benefits shall be derived from its construction to the villages and wider community.</p>	Noted, these are matters for the Local Transport Plan and local plans.	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	Page 46 under 'coverage in Norfolk'. Weak rather than week.	Agreed	NSF updated
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	<p>There are serious utilities, travel and environmental infrastructure deficits in North Norfolk and Broads Authority areas. These are being covered up by the utility providers by failing to reveal capacity and performance shortfalls at the Local Plan stage and by planning officers by failing to either recognise or hold fast to major constraints and exploit opportunities for developers to fund improvement or mitigation schemes. There are similar capacity deficits in drainage and flood protection systems especially in remote areas and small villages which have seen great population growth over the past 40 years. These deficits need to be identified and addressed by agreements to invest to increase capacity and overcome existing problems.</p>	Noted - the authorities are continuing to work to address these issues	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd	<p>1 The NSF vision and objectives are to a large extent based on agreements to implement policies that improve connectivity to enable to economy to grow. It is therefore regrettable that transportation, still the backbone of connectivity and economic activity, is not treated separately from wider issues of investment in utilities and environmental considerations. We believe the NSF is weaker for this not being so.</p>	A New transport agreement has been added to the NSF to enhance the transport section	New transport agreement added.
BHLF-3C85-CAJT-5	Catfield Hall	<p>Consultation Response by Mr and Mrs Harris, Catfield Fen with input from specialist advisers on ecology and hydrology</p> <p>Adequacy of Water Resources</p> <p>These comments should be considered in the context of the European Habitats and Water Framework Directives which provide the legal framework for environmentally important sites such as Catfield Fen which are threatened by water related issues.</p> <p>In section 7.4 "Water" on page 43 the following statement is made:</p> <p>"Anglian Water's Water Resources Management Plan to 2040 demonstrates how sufficient water for future growth will be provided and therefore water supply is not a strategic constraint to development."</p> <p>For the Norfolk Broads area this assertion is too optimistic, even facile, for the following reasons:</p> <p>1. The Anglian Water Resource Management Plan (AWRMP)2015 which is quoted, shows that the Norwich and the Broads area currently has, by some way, the highest water deficit area across the whole Anglian Water Region [see attached RZ(Resource Zone) Supply Maps for 2019-20 and 2039-2040 from the AWRMP which show a consistent deficit].</p> <p>2. Neither Anglian Water nor the Environment Agency in their recent publications have caught up with the implications for water abstraction in the Broads arising from the Catfield Feb Public Inquiry which were published in September 2016. Simply put these are:</p> <p>i. Water abstraction was the probable cause of damage to Catfield Fen, a wetland of international significance with the highest levels of conservation designation, and abstraction should cease. This includes Anglian Water's public water supply abstraction at Ludham.</p> <p>ii. The monitoring systems used by Natural England and the Environment Agency were found to be inadequate in identifying the deleterious effects of abstraction on Wetlands. This conclusion has now been accepted by these statutory bodies which has clear implications for other wetlands in the Broads which are exposed to abstraction.</p> <p>Catfield Fen was recognised as an important test case, as demonstrated by the need for a Public Inquiry, and its implications need to be considered (and applied) throughout the Broads where many fens have deteriorated in recent years. An Environment Agency map from its recent "water for life and livelihoods" publication is</p>	<p>The Catfield Fen public inquiry focussed specifically on two private water abstractions close to the fen. It is the Environment Agency who have extended the Inquiry decision to the Anglian Water Ludham source and have requested it to be moved. It has been programmed into AMP 6 (2015 to 2020) for appraisal of options to reduce and ultimately relocate the abstraction source. Closure of the current source is required during the AMP7 period (2020 to 2025). AWS are required under the Habitats Regulations to close the source as soon as practically possible. The monitoring systems used by NE and the EA are fit for the purposes for which they was installed – for the EA this was for constructing and calibrating the Regional Groundwater Model, not specifically for detecting and monitoring abstraction impacts on ecology within Habitats Directive sites. While some fens may be deteriorating, this could be down to one or more of many factors, including water quality and site management. They have not identified any other sites in the Broadlands area where abstraction is believed to be the cause of deterioration. At present the EA is concentrating it's efforts on examining the Ant Broads and Marshes SSSI which is part of The Broads SAC (Habitats Directive site). We have no current plans to extend our assessment of abstraction impacts to other SSSIs, although we will be guided by Natural England's advice in this respect. Anglian Water have a statutory obligation under the Water Industry Act 1991 to propose appropriate supply and demand measures to ensure that they can continue to supply existing and new customers. Consideration is given to reducing the potential demand for water before proposing supply measures in their WRMP. It is acknowledged by Anglian Water that large AMP6 deficits are forecast in the Norwich and the Broads Resource Zone. The WRMP outlines the measures which are proposed by Anglian Water to address the projected deficit.</p>	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	Also within this section, the commentary on Essex and Suffolk Water who are a provider of water is not included.	Agree, add reference to Essex and Suffolk Water	Reference to Essex and Suffolk Water added
BHLF-3C85-CA6A-X	Broads Authority	<p>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.</p>	<p>Anglian Water have a statutory obligation under the Water Industry Act 1991 to propose appropriate supply and demand measures to ensure that they can continue to supply existing and new customers. Consideration is given to reducing the potential demand for water before proposing supply measures in our WRMP. It is acknowledged by Anglian Water that deficits are forecast in the following WRZs:</p> <ul style="list-style-type: none"> • Fenland (AMP 6) • Huntstanton (AMP 7) • Norwich and the Broads RZ. (AMP 6) <p>The WRMP outlines the measures which are proposed by Anglian Water to address the projected deficits.</p> <p>To ensure that all opportunities are taken to reduce demand they are keen to promote measures to encourage improved water efficiency as part of new development including the inclusion of the optional higher water efficiency standard for residential development (110 litres/per person/per day) in Local Plans and innovation in water efficiency/re-use to contribute long term water resilience within the Anglian Water region.</p>	<p>Add new agreement to adopt the optional higher water efficiency standard for residential development (110 litres/per person/per day) in local plans</p>

BHLF-3C85-CA65-J	Greater Norwich Local Plan	<p>I am pleased to see that there is a commitment in the Strategic Infrastructure and Environmental Objectives section to reducing the demand for and use of water and that the section on water promotes high standards of water efficiency in new development. However, in my view it is important to make it clear just how Local Plans in this area of low rainfall can promote water efficiency. To do this, I think it is necessary to have an agreement concerning implementing the optional higher Building Regulations standard of 110 litres per person per day (lppd) in new housing development and to promote water efficiency in other types of development. The optional higher Building Regulations can be required through Local Plans in areas of water stress, which applies to all of Norfolk. To my mind, it is important that all LAs commit to this approach through their Local Plans. Information in the attached document, which identifies the possible policy approaches for Greater Norwich through its emerging Local Plan, can be adapted to provide a justification for promoting water efficiency, information on how it can be done and to inform the content of an additional agreement in the NSF.</p>	<p>The Environment Agency has advised the Secretary of State that the areas classified as 'Serious' in the final classification table of the above document should be designated as 'Areas of serious water stress'. The Anglian Water company area is considered to be such an area and includes the majority of Norfolk including Greater Norwich. Breckland and Broadland Districts Councils, and the Broads Authority (in the AW area only) have included the reference to the optional higher water efficiency standard for residential development in their adopted or emerging local plans. Anglian Water is supportive of the inclusion of the optional higher water efficiency</p>	Add new agreement to adopt the optional higher water efficiency standard for residential development (110 litres/per person/per day) in local plans
BHLF-3C85-CA35-D	Holme-next-the-Sea Parish Council	<p>This section notes that the capacity of sewage works and receiving water courses, together with quality of outputs are all strategic issues - and further that it will be necessary co-ordinate the approach to water management. It would be helpful to understand how this approach is being co-ordinated through the NSF.</p> <p>Also – what arrangements are in hand to monitor water quality- especially environmentally sensitive areas in the Protected Sites outside The Broads? Norfolk has a number of rare chalk streams that provide important wildlife habitats but which are facing pollution issues. These include the River Hun which flows through Holme next the Sea – and falls outside the EA’s monitoring responsibilities. Once again West Norfolk seems to be under-represented here - the NSF notes that in considering the distribution of growth, LPA’s need to avoid cumulative detrimental impacts on the most sensitive water courses - particularly those in the Broads and on the Wensum. Can the NSF provide an overall approach to monitoring and caring for these rivers – and also for other water bodies including the lagoons which support rare birds and other wildlife – many of which currently enjoy SAC / SPA / Ramsar / SSSI status (such as Broadwater Lagoon in Holme)?</p> <p>The identification of the cumulative impacts of incremental change is especially welcomed – and we believe is a growing issue for the AONB and the Protected Sites in Holme-next-the-Sea.</p>	<p>Permits issued by the Environment Agency for water recycling centres (formerly sewage works) state a variety of conditions including the permitted dry weather flow (DWF) and the chemical standard of discharge. Permits are issued by the Environment Agency and the conditions within are site specific, set at a level to ensure sufficient water quality at the discharge point. Anglian Water regularly monitor the position against both the DWF and the standards which can prompt further investigation, a change in working practices and/or investment through their business plan where required. There is a need to consider the scale and timing of development outlined in Local Plans to ensure it is aligned with water recycling centre capacity (formerly sewage works) and the NSF has complete work to address this.</p>	No change to NSF
ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	<p>It is critical that the approach to water is approached holistically and that constructive approaches to water supply and management are considered at the early stage of allocating land for development which also fully take into account flood risk, and the water requirement of the agricultural and other industries.</p>	<p>Water resource planning is undertaken on a much larger scale than individual local authorities – it is undertaken on a sub-regional scale. Anglian Water has been working with a range of organisations including representatives from the agricultural sector as part of the Water Resources East Anglian project on long term water resilience. Therefore the availability of water resources within the Anglian Water region is unlikely to have any impact on the delivery of individual sites in Norfolk County. However consideration should be given to water supply as part of the identification of allocation sites in Local Plans currently under preparation.</p>	No change to NSF
BHLF-3C85-CA6A-X	Broads Authority	<p>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.</p>	<p>Water section has been updated in light of comments received</p>	No further change to NSF
ANON-3C85-CA6C-Z	Environment Agency	<p>We would ask that consideration is given to recognising the importance of the county’s rivers. This could possibly be added to the first bullet point of the To improve and conserve Norfolk’s environment by: section on page 40. The Wensum is mentioned in particular in section 7.4 at the top of page 44. This is good as it recognises it’s SAC designation, but we should not forget that we have duties under WFD and through the River Basin Management Plan to improve all waters that are below target status, and not to allow deterioration in any element. The wording in the very last paragraph of section 7.4 may therefore not go far enough. It states : In considering the distribution of growth Local Planning Authorities will need to ensure that distribution avoids cumulative detrimental impact on the most sensitive water courses particularly, those in the Broads and on the Wensum which cross a number of Local Planning Authority boundaries.</p> <p>One mechanism to help with this welcome approach to joint working is to ensure that each public body discharges their duty to have regard to River Basin Management Plans to ensure that their plans and actions do not risk delivery of the environmental objectives for each water body in the County (not just protected sites). Most of our rivers are not of the environmental quality that they could be for various reasons. The potential for sensitive development to improve this should be harnessed.</p> <p>There may be significant opportunities for obtaining external funding for activities that delivered shared environmental improvements (last bullet on first page of introduction). EA WEIF (Water Environment Improvement Fund) may be one such example where new activities are designed so as to deliver improved environmental outcomes, and other organisations may have similar opportunities where shared objectives can be identified.</p> <p>We welcome the acknowledgement that development may need to be phased to ensure water quality is maintained in regards to sewage discharges. As your document states water cycle studies should be used as evidence to maintain water quality.</p> <p>The document quite rightly states that flood waters do not respect administrative boundaries and would support a joint approach to minimising flood risk through collaborative working.</p> <p>The sentence at the top of page 56, mentions the epoch 2 scheme, for clarity we feel this should clarify it relates to epoch 2 of the Great Yarmouth Tidal defence project.</p> <p>The Great Yarmouth tidal defences epoch 2, runs from 2016 - 2021 with a start date of 2026. We would support funding from various sources as indicated in the document but feel contributions should also be sought from developers.</p> <p>We feel that the text regarding funding could be expanded and strengthened - we have included a possible suggested text below The Great Yarmouth tidal defence works planned until 2061 manage the risk of flooding to the town in a changing climate. The defences protect not only people, property and businesses in the town, but also important infrastructure links and services that serve the whole of Norfolk and enable growth and development. Government will provide funding for a proportion of the works based on the number of homes better protected. However partnership funding will be required to fully fund the project and</p>	<p>Support noted and updates made as required including the inclusion of the following text - Each public body will have regard to River Basin Management Plans to ensure that their plans and actions do not risk delivery of the environmental objectives for each water body in the County (not just protected sites).</p>	NSF updated

<p>BHLF-3C85-CA3R-C</p>	<p>Member of Parliament</p>	<p>Re: Consultation Response from the Rt Hon Norman Lamb MP to the Norfolk Strategic Framework I write with regard to the above. I enclose a copy of the consultation response submitted by my constituents, Mr and Mrs Harris of Catfield Hall in Catfield. As you can see, Mr and Mrs Harris' response directly challenges the assertion on page 43 that: "Anglian Water's Water Resources Management Plan to 2040 demonstrates how sufficient water resources for future growth will be provided and therefore water supply is not a strategic constraint to development." Mr and Mrs Harris' submission goes on to make the point that the outcome of the public enquiry in respect of Catfield Fen has not been sufficiently understood and acted upon in terms of the implications for water abstraction in the Broads and the sufficiency of water resources in the Broads area in respect of future growth. I do hope that you will take very serious note of the full consultation response submitted by Mr and Mrs Harris. These are clearly important issues given the fact that Catfield Fen is a wetland of international significance with the highest level of conservation designation and also that there are other significant and sensitive sites across the Broads area.</p>	<p>Please see point above regarding Catfield Fen</p>	<p>No change to NSF</p>
	<p>Dereham Town Council</p>	<p>. The Dereham waste water capacity improvements are not listed. . Table 12 – this table does not give any certainty, most of the start dates are not known, two that have been given a date will start at some point over the next 10 years. Most of the estimated costs are to be confirmed and 'likely funding sources' does not really provide any certainty either. It would be useful to know what funding has actually been confirmed. Certainty over deliver is important particularly for Thetford being a major growth area which can only deliver 300 houses without the energy supply being installed, it would therefore be expected that there is a greater level of certainty on this matter.</p>	<p>Anglian Water are currently in the process of bringing forward a scheme which will involve the construction of a new rising main and associated infrastructure to direct foul flows from Dereham. The scheme is expected to be completed by December 2018. Table 11 and 12 separate out commit and promoted development projects, further details will be added in future version of the NSF and Infrastructure Delivery Plan</p>	<p>No change to NSF</p>

CONCLUSION AND NEXT STEPS COMMENTS

Response ID	Organisation	Answer	Officer response	Action
ANON-3C85-CA87-P	Resident	I would urge that this costly waste of ratepayers money be suspended until the outcomes of Brexit are clearer as it will impact on so many areas and make this document , in its current form effectively useless	Norfolk Authorities have a duty to plan strategically and are unable to suspend work until Brexit outcomes are clear, however this work is an on going process and will be reviewed when the Brexit position is clearer.	No change to NSF
ANON-3C85-CA8T-K	Hockering Parish Council	We are appalled at the amount of money being spent on roads when public services are deteriorating.	Noted	No change to NSF
ANON-3C85-CA8V-N	Hunstanton Coastal Community Team	Inter agency co-operation is vital to making it happen.	Support Noted	No change to NSF
ANON-3C85-CAXN-D	East Ruston Parish Council	Will the people of Norfolk be listened to or will we be dictated to by central government who will threaten us with economic sanctions if this new building does not take place	In reality it is acknowledged that local authorities will only have limited influence over the level of housing they seek to plan for owing to central government requirements related to OAN.	No change to NSF
ANON-3C85-CAXP-F	Bidwells (on behalf of Attleborough Land Limited)	Attleborough Land Limited fully supports the Norfolk Planning Authorities and their holistic commitment to vital infrastructure enhancements. These enhancements are crucial to facilitate economic growth and meet housing demand in Norfolk. Where public funding is available it should be used to help support new development and improve the viability of strategic development schemes which generally require considerable upfront investment in infrastructure before substantial housing growth can be delivered.	Support Noted	No change to NSF
ANON-3C85-CAJC-M	Borough Council of King's Lynn and West Norfolk	<p>OVERALL COMMENTS ON THE NORFOLK STRATEGIC FRAMEWORK</p> <p>On 6 September the Borough Council Cabinet resolved that the Norfolk Strategic Framework be supported.</p> <p>The decision was taken to do this so as to ensure that the Council discharges its legal duty to co-operate with neighbouring authorities in relation to strategically important land use issues which cross administrative boundaries. The result of such cooperation is expected to be better planning outcomes.</p> <p>The Borough Council has actively co-operated in a number of joint studies with the wider group of authorities and has found this to be beneficial strategically and financially. The agreements specified throughout the document are acceptable as a starting point for further co-operation in the next round of local plan work, and could potentially be developed further.</p> <p>(The full Cabinet report can be found at: http://democracy.west-norfolk.gov.uk/documents/s16561/NSF%20Report%206%20September%202017.pdf)</p>	Support Noted	No change to NSF
ANON-3C85-CAJG-R	Resident	Work must be done with NNDC and local full time NNDC residents so the proposals take account of the district's needs. Currently the document fails to do this.	Noted	No change to NSF
ANON-3C85-CA63-G	Hunstanton & District Civic Society	The collaboration and cooperation demonstrated in this document is very welcome and must continue so that there are coordinated approaches to the challenges and opportunities facing Norfolk.	Support Noted	No change to NSF
ANON-3C85-CA6U-J	Resident	Please see comments for Section 7. The infrastructure is the backbone of economic growth.	See response in section 7	No change to NSF
ANON-3C85-CAJF-Q	Resident	That this is a Draft is welcome, because there are considerable deficiencies between the input policies and agreements and outcomes (the vision). This is probably nowhere more so than in the provision of local bus services, but it is more widely apparent than that.	Noted	No change to NSF
BHLF-3C85-CA34-E	Norfolk Geodiversity Partnership	The Norfolk Geodiversity Partnership would welcome opening a dialogue with the NSF process, as part of improved networking re. objectives for the natural environment.	Noted	No change to NSF
ANON-3C85-CA6Y-P	King's Lynn Business Improvement District Ltd (KLBID)	<p>1 KLBID hopes that its input in answers to the previous questions will be given due consideration in the process of writing the final NSF, and in particular weight will be given to its view, set out in the various sections above, that the countywide document is widely at odds with the economy and experience in the West of the county, and for that reason alone, it needs redrafting to recognise the differences and how they be addressed.</p> <p>2 KLBID does not agree with the setting up of a secretariat to administer, review and refine the NSF following its adoption by Members. This creates another level of bureaucracy and sucks funds away from frontline services, and for that reason must be resisted.</p>	Input is appreciated and other views noted	No change to NSF

BHLF-3C85-CA3S-D	Holme-next-the-Sea Parish Council	<p>Section 8 – Conclusions and Next Steps</p> <p>The NSF is a new and very strategic document with some sound objectives and a commitment to joint working. For this reason it is not always easy to translate how the underlying principles and proposals might be followed through and implemented in practice. We understand that much of the document may change in the run up to the final version but in the meantime, it would be extremely helpful if NCC could arrange for a “roadshow” to allow Parish Councils, Neighbourhood Plan Teams (not mentioned within the NSF but now growing in number across the County) and other interested organisations to get a better understanding of the way in which the framework document will / can be used on a practical level.</p>	In practice resources will be insufficient for detailed engagement at the parish or neighbourhood level in relation to the NSF. It is important that neighbourhood groups continue to engage directly with their relevant district in relation to planning matters.	No change to NSF
ANON-3C85-CA3V-G	Resident, business	<p>The planning process is too slow and inflexible. Documents such as this need to be 'live' - and under constant rolling review and adjustment.</p> <p>The days of producing a printed plan to sit on a shelf for reference are behind us. The up-to-date version can be accessed on line at any time. So let's keep it (and indeed associated LDFs etc) up-to-date and relevant rather than the system we have had of working to a plan clearly out-of-date but with half an eye to an 'emerging' replacement.</p> <p>In particular, we will need an urgent review of all plans when the implications of Brexit are clearer - both to address any problems and to seize opportunities before they are missed.</p>	Comments noted, Norfolk Authorities are committed to ensuring the NSF is a live document and envisage that it will be continue to be updated and enhanced, this is particularly important given the current review of the NPPF and the expect Statement of Common ground which will be addressed through the NSF	No change to NSF
ANON-3C85-CA6C-Z	EA	whilst we have no specific comments on this section, we would welcome the opportunity to work with you in the future to assist in the delivery of the plan producing environmental outcomes for people and wildlife	Future input and support is welcomed.	No change to NSF
ANON-3C85-CA3N-8	Heritage Railway worker, Chairman of BBNWA and local Residents Assoiaton	<p>I write as a member of the Melton Constable Trust and The Mid-Norfolk Railway and as a constant visitor to Norfolk mainly to visit the heritage railways and Norfolk on Holiday.</p> <p>I support those that actively pursue the prospect of bringing back regular rail services to places such as Dereham, Fakenham and Holt by use of the existing heritage lines and existing Network Rail routes. To this end I support the feasibility studies of those groups hoping to link up the railways of both MNR & NNR which would be an superb addition and tourist attraction to Norfolk. This would be by using purchased land at both Holt and Fakenham. As has been shown elsewhere in the country, we believe that this could make a massive contribution to the local economy, help address road congestion , be a further boost to tourism and help tackle rural isolation.</p> <p>To this end can we please suggest that there is a positive reference in the document to continuing support for the Bittern and Wherry lines and support in principle for the reconnection to the main network to Dereham, Fakenham and Holt ?</p> <p>The technical and financial hurdles are recognised. We are only asking for support in principle for the work we are pursuing and that all any future development of properties is only given consent where it does not hinder our work in moving forward with our aims.</p>	Noted	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	<p>We support the joint working that this Framework generates and hope that this can evolve to create the strategic approach essential to the successful development of a cross cutting planning framework, to address the specific issues of economy, housing and infrastructure in the County.</p> <p>We also advocate the role of a special set of workshops to explore the more imaginative aspects of our comments and vision, led by a consortium of politicians, business interests, agricultural advocates, conservationists, and community and youth organisations. This process would not only explore the viability of garden communities as part of the new Framework. It would also re-examine some of the spatial improprieties of its smaller scale housing devilmnt proposals, and set the high benchmark for the provision of only energy, water, waste and carbon efficient properties and community values which must surely be the lifeblood of any community designed to exist for more than fifty years to come.</p> <p>As the leading independent planning practice in Norfolk, we would be keen to work with the County and District Councils to help develop this Framework and this vitally important ensuing stage.</p>	Comments noted. Offer of future engagement on future planning matters is welcomed.	No change to NSF

ANON-3C85-CA3Z-M	BUILDING GROWTH Place Land & Markets Group	We would look forward to meeting with the NSF to explore how BG PL&M can support the emergence of a positive , sustainable and deliverable grow agenda for Norfolk	Comments noted. Offer of future engagement on planning matters is welcomed.	No change to NSF
ANON-3C85-CA31-B	Wroxham Parish Council	Wroxham Parish Council supports the Norfolk Strategic Framework's aim to improve quality of life for the population of Norfolk by ensuring new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure. It agrees with the assessment that Norfolk's infrastructure needs significant enhancement if growth is to be delivered without compromising the quality of life and environment on offer. The key word to remember, the Parish Council feels, is 'sustainable'. We firmly believe that a by-pass would provide the housing growth necessary in this area and alleviate the existing pressures on the heart of our twin communities.	Support and comments Noted	No change to NSF
ANON-3C85-CA35-F	Tunstead & Sco Ruston Parish Council	The document is far too wordy and should be more precise. Much further consultation and public awareness should be distributed. Suggest local media is used to promote the draft document to encourage response through local press.	Noted	No change to NSF
ANON-3C85-CA3K-5	Natural England	Natural England welcomes the opportunity to comment on the draft NSF. We support the production of shared objectives for all planning authorities to help ensure that Norfolk's environmental assets are protected and enhanced. We welcome further engagement in this strategic process. If you have any questions about our comments please contact me.	Support Noted	No change to NSF
BHLF-3C85-CACV-Z	Gladman	Conclusions Gladman welcome this initial opportunity to comment on the draft Norfolk Strategic Framework Statement and hope that these comments are found to be constructive. Gladman would like to remain on the consultation database and kept informed of any further stages of consultation.	Support Noted	No change to NSF
BHLF-3C85-CACK-N	Hoveton Parish Council	Hoveton Parish Council supports the Norfolk Strategic Framework's aim to improve quality of life for the population of Norfolk by ensuring new development fulfils the principles of sustainable communities, providing a well-designed living environment adequately supported by social and green infrastructure. It agrees with the assessment that Norfolk's infrastructure needs significant enhancement if growth is to be delivered without compromising the quality of life and environment on offer. The key word to remember, the Parish Council feels, is 'sustainable'.	Support Noted	No change to NSF

Response ID	Organisation	Answer	Officer comment	Action
ANON-3C85-CAFP-W	The residents and businesses of Hoveton & Stalham Division	In case it was missed earlier, I ask that Agreement 1 at Sect 1.3 be amended to include: employment, economic, infrastructure and environmental needs. This shouldn't be limited to housing.	Response noted in Section 2	No change to NSF
ANON-3C85-CAFT-1	Resident	I'm interested to see that there is no mention of CIL / S106 payments and use in order to support the same outcomes desired by the strategic framework. If the funds generated by the development in areas isn't well used (as it often isn't now) and without the engagement of communities then it's a missed opportunity. Too often generic consultation overrides genuine community engagement in decision making, and decisions are taken by a small handful of people in councils with very little true involvement of others.	Different approaches exist towards CIL and sec 106 across the County and this is really a matter for the LPAs to address individually or collectively (for example through the Greater Norwich Growth Board) within the confines of legislation	No change to NSF
ANON-3C85-CAXF-5	N2RS - No to Relay Stations	The picture shown is an example of the working landscape which we value so much. This is at risk of development with cable relay stations proposed for the area. This will have huge impact on the area. I write on behalf of N2RS which currently has around 350 people who oppose these relay stations. Instead they support HVDC technology to ensure onshore wind farm development respects our countryside.	Noted	No change to NSF
ANON-3C85-CAJ1-2	Resident	I have found it all most impossible to use this website. Two scrolling bars make it difficult to focus on any one section. The outer one simply covers the first page of each section and then takes you to the comment box. Clicking on the inner bar makes the image jump around so that I found it impossible to read more than 2 or 3 lines on a page. Sometimes moving the outer bar allowed me to read a bit more of the substantive passages, but then switching to the inner bar put me on a small piece of text, less than a page. Scrolling back was impossible.	Noted	No change to NSF
ANON-3C85-CAJW-8	Chedgrave Parish Council	Please be advised that at our last Parish Council meeting on 7th September 2017, there was a general discussion about the document which was considered to be too lengthy and incomprehensible for detailed comment. The Councillors also felt that their views would not be taken into consideration anyway. Thank you.	Noted	No change to NSF
BHLF-3C85-CA6B-Y	Northwold and Whittington Parish Council	Please be advised that Northwold and Whittington Parish Council discussed the Norfolk Strategic Framework at its meeting on 5th September. No comments were raised for submission.	Noted	No change to NSF
BHLF-3C85-CA6Z-Q	Cringleford Parish Council	Cringleford Parish Council is grateful to have been consulted. We have noted the contents which will inform our responses in the future.	Noted	No change to NSF
BHLF-3C85-CA34-E	Norfolk Geodiversity Partnership	The Norfolk Geodiversity Partnership would welcome opening a dialogue with the NSF process, as part of improved networking re. objectives for the natural environment.	Noted	No change to NSF
BHLF-3C85-CA33-D	Norfolk Area of the Ramblers	SUMMARY Norfolk Area Ramblers welcomes the clear identification and quantification of growth in the over 65 population and the importance of investment and maintenance in the Green Infrastructure network. We see 3 areas of omission: 1. The need to recognise explicitly the implications of rapid growth in population among the middle aged cohort who will be interested in developing and maintaining their health through fitness. Walking is likely to be the most popular of these activities which will vary from strolling, short brisk walks and group led middle distance walks and a significant level of demand is likely to occur from walkers wishing to exercise in rural areas. 2. Although there is recognition of the need for investment and maintenance of Green Infrastructure, there is no explicit mention of the PROW network and its importance in providing the variety and scale of opportunity for walking, riding and cycling exercise for this growing cohort of demand. 3. In order to maintain the PROW network over the 20 year horizon envisaged by the report a strategic and proactive asset management plan approach will need to be adopted at all levels of local government.	The points raised are addressed in other sections of the document as they are raised.	No change to NSF

BHLF-3C85-CA3J-4	The Somerleyton Estate	<p>We are instructed by The Somerleyton Estate to write to you in response to the above-named public consultation. The Somerleyton Estate has enjoyed a very productive mutual relationship with the Borough with specific regard to Fritton Lake for over ten years and it is because of this close working relationship the Estate has taken care to make representations to planning-related consultations representing the 'rural point of view' as they do successfully in other local authority areas.</p> <p>As a significant land owner and provider of one of the Borough's primary inland tourist attractions the Somerleyton Estate have an interest in the sensitive development of the Borough and more specifically the area of, and approach to, this attraction. This interest therefore extends to any strategic planning documents which would inform future local plans.</p> <p>We understand that whilst "concentrating only on those matters where there is a clear need for agreement between the Local Authorities" two key aims of this Norfolk Framework are "to inform the preparation of future local plans and high levels plans such as the Strategic Economic Plan". As such The Somerleyton Estate is keen that the Framework fully recognises the importance of facilitating sustainable rural tourism whilst ensuring sufficient environmental safeguards are in place to prevent harm to those special qualities that tourists visit Norfolk for.</p> <p>In 2012 and 2015 The Somerleyton Estate made representations to the Gt. Yarmouth Core Strategy and look forward to being consulted on the site specific and development management policies as they progress. In those earlier consultation responses the Estate were keen to make clear the need to have regard to the defining characteristics of the landscape character of the Beacon Park area and specifically to seek to avoid the coalescence of settlements which might encroach upon the strategic countryside gap between Browston and Gorleston/Bradwell. Our responses to this consultation compliment the earlier approach and we have provided specific responses via the consultation website in the format required. This letter reiterates the responses made there.</p> <p>The main point we would make about the draft Norfolk Strategic Framework is that tourism is conspicuous by its absence from a great deal of the document not getting its first mention until page 22. As a result there is little outward appreciation of the contribution tourism makes to the Norfolk economy and how this relies on both promoting related economic growth but also protecting the environment upon which Norfolk tourism relies.</p> <p>We understand from the Great Yarmouth Tourism Strategy 2013 to 2018 that "tourism is one of the key sector industries within Norfolk, supporting over 51,000 people and contributing some £2.6 Billion to the local economy". We also understand that "the most recent Tourism in Norfolk Strategy covered the period 2009 to 2012". https://www.great-yarmouth.gov.uk/CHttpHandler.ashx?id=980&p=0</p> <p>We appreciate the Framework's focus on trying to attract hi-tech industries and supporting the off-shore energy industry but this should not be at the expense of existing key industries.</p> <p>As the Great Yarmouth Tourism Strategy points out "tourism is Great Yarmouth's biggest single sector, and it directly and indirectly represents an economic impact of £531 million per annum (2011 figures) and 29.3% of the borough's employment".</p> <p>We would ask the Borough Council to make sure it fights to ensure the tourism industry gets adequate representation in this Norfolk Framework in particular focussing on supporting the whole county and not just the 'Norfolk Coast, the Broads and the Brecks'.</p>	Noted the tourism reference in the economy section has been updated	No further change to the NSF
ANON-3C85-CA6Q-E	Resident	<p>The conclusion says that the document may change considerably. Any major revisions will need to be comprehensively reviewed again by the same audience as this draft.</p> <p>As one progresses through the document, its proposed solutions seem to become weaker. It is almost as if it is was structured to put those sections, where the most effort and strength in is its authoring, at the front of the document. The latter sections need to be strengthened and not devolve its observations and its proposals to other documents. Otherwise the framework appears to dissolve.</p>	Noted, the document has been enhanced from feedback received through the consultation.	No change to NSF
BHLF-3C85-CA3F-Z	Great Yarmouth Borough Council	<p>Great Yarmouth Borough Council endorses the Draft Norfolk Strategic Framework and the agreements in it.</p> <p>The Borough Council looks forward to working with its partners to finalise the document in the light of comments and suggestions received during the course of this consultation, and to continue to address strategic planning matters on into the future.</p>	Noted	No change to NSF
ANON-3C85-CA3Y-K	Lanpro Services Ltd	<p>GENERAL REPRESENTATION – NEW NORFOLK GARDEN TOWN</p> <p>As Norfolk's largest independent planning practice, we have a comprehensive understanding of the social, economic, environmental, community and spatial requirements within our County. We would like to convey our own experiences into this consultation over the Norfolk Strategic Framework. We especially want to advance the case for a revolutionary approach to meeting future housing and community infrastructure needs based on an updated vision of the garden settlement as advanced by planning pioneers Ebenezer Howard and Frederik Osborn a little over a century ago. These men were holists who envisioned health, beauty, work, leisure and society all as one, intricately connected to natural beauty and the enhancement of nature. They were convinced that health, natural surroundings, social support and an overwhelming commitment to decency and fairness would lead to creative and productive people thriving on innovation and enterprise. Letchworth and Welwyn Garden City were established using these principles and we contend that a new garden town in Norfolk to meet known growth requirements should be explored through the emerging Strategic Framework. Our vision is a to create a new stand-alone 21st Century highly accessible, inclusive and smart settlement comprising a connected network of modern living and employment spaces set in the context of sustainability principles and practices.</p> <p>We share your aspirations for a County that will thrive and grow whilst respecting its heritage and meeting the challenges of this Century. We believe that this will require joint working between Local Planning Authorities, communities, funding partners and developers, in order that shared aspirations and joint commitments can be brought forward in a planned manner. We would like to be involved in this process.</p> <p>In addition to the proposed garden town, limited development through the careful expansion of our existing towns and larger villages will also be required to support and sustain existing communities in the period up to 2036. We acknowledge and recognise that this additional growth is required as the coming 20 years will see at least 14% increase in Norfolk's population, excluding growth through certain sectors of housing and via the Greater Norfolk Joint Core Strategy.</p> <p>This will also lead to a need to provide additional jobs, social care, community infrastructure and public transport improvements across the region. We consider that properly planned development within a new garden town could be used to cross fund and support wider initiatives and inter-District transport improvements to benefit Norfolk's existing rural population. There is also a growing problem of affordability, low paid employment, social inclusion, an increasing need for elderly and specialist accommodation, and problems with increasing social exclusion and disillusionment amongst the young. We believe that a new bespoke garden town could be the answer to addressing some of these problems. (continued below)</p>	Noted	No change to NSF

ANON-3C85-CA3Y-K	Lanpro Services Ltd	<p>(continued from above) We envisage a garden town that captures, retains and recycles part of the development value from the land being developed. This money will be channelled through long term stewardship models governed by Community Trusts to reinvest the wealth created back into the garden town in a variety of ways to create real long-term community benefits and provide opportunity. These are the very best of Howard's principles and linked with modern, sustainable development, with place making at its heart. Through this strategic approach to meeting Norfolk's longer-term housing needs we can delivery local and sub-regional benefits whilst causing minimal harm to existing communities and the Norfolk landscape.</p> <p>In addition to high quality place making, appropriate site selection has the potential for improvements to local infrastructure, road and rail based public transport networks, schools, medical facilities, care and community facilities, benefitting communities far beyond the immediate environs of the new settlement. It is this value-added element which is the hallmark of the garden community practice and an approach that should be seriously considered as part of this strategic priorities assessment process. The same opportunities cannot be delivered through more traditional dispersed housing strategies.</p> <p>We request that serious consideration be made in the strategic review to create the guidelines and opportunities for a planned new garden town within Norfolk, based on the full suite of garden community principles, which will create certainty in meeting the aspirations of this document and ensure genuine betterment for the local community. We urge Norfolk's Local Planning Authorities to work land owners, private sector developers and experts in stewardship, land capture and futurism to understand whether a garden town opportunity exists and we would encourage a full debate as to how these principles can be applied to benefit our County.</p>	Noted	No change to NSF
ANON-3C85-CA35-F	Tunstead & Sco Ruston Parish Council	Our Parish Clerk and Councillors were unaware of the document. The response deadline was far too short to consider the document properly.	Noted	No change to NSF
BHLF-3C85-CAC8-2	Suffolk County Council	<p>The Suffolk local authorities (Forest Heath District Council; St Edmundsbury Borough Council; Mid Suffolk District Council; Babergh District Council; Ipswich Borough Council; Suffolk Coastal District Council; Waveney District Council and Suffolk County Council) welcome the opportunity to comment on this draft document. They also welcome the on-going involvement of the Suffolk authorities in the development of the framework.</p> <p>There are important common issues for Norfolk and Suffolk both at strategic and more local levels. Many of the strategic issues have been identified within the New Anglia Local Economic Partnership's New Economic Strategy. It will be important for the planning policies that emerge from the Framework (and for those in Suffolk) to relate closely to that Strategy if the area as a whole is to be successful both in its growth ambitions and in achieving the infrastructure required. In doing this it is welcome that the time horizon for the Norfolk Strategic Framework is 2036 which aligns with the most if not all of the end dates for local plans in Suffolk now being prepared. (It is acknowledged that parts of both counties also lie within the area of the Greater Cambridge Greater Peterborough LEP and there may also be a need to link to initiatives in that strategy as it develops along with the spatial strategy of the mayor of the combined authority for that area.)</p>	Noted	No change to NSF
BHLF-3C85-CACM-Q	Savills	<p>Support is given to the collective authorities for seeking to formalise the cooperation between neighbouring authorities and seeking to provide a framework through which they can address cross-boundary planning issues. It is considered that this proactive approach to strategic planning is in accord with the core principles for planning as stated in Paragraph 17 of the National Planning Policy Framework (NPPF).</p> <p>It is, however, considered that further guidance is required to clarify what weight should be given to the document once adopted.</p>	The matter of weight to be ascribed to agreements and text in this document will vary depending on circumstances and will be a matter for each local planning authority	No change to NSF
BHLF-3C85-CACV-Z	Gladman	<p>The Duty to Cooperate (DtC) is a legal requirement established through Section 33(A) of the planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on crossboundarystrategic issues through the process of Plan preparation. As demonstrated through the outcome of the2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of a Local Plan. This mattercannot be rectified through modifications.The Planning Practice Guidance (PPG) provides guidance upon compliance with the DtC which makes clear that local planning authorities should explore all available options of delivering the planning strategy within their ownarea, and should approach other authorities with whom it would be sensible to seek to work to deliver the planning strategy1. This should be achieved through co-operation between local planning authorities, county councils andother public bodies to produce effective policies relating to strategic cross boundary matters2. Whilst there is no definitive list of actions that constitutes effective cooperation under the duty, cooperation shouldproduce effective policies relating to cross boundary matters and may involve local planning authorities and publicbodies entering into agreements on joint approaches, which may involve joint evidence and strategies to define the scope of Local Plans across the Housing Market Area (HMA). It is clear that the Central Norfolk HMA is affected by the influence of a dynamic market area with an emphasison meeting the HMA's economic growth ambitions. It is therefore important that the authorities contained in the HMA do not lose sight of this objective and the that the DtC is a process of ongoing engagement and collaborationand that it is intended to produce effective policies on cross boundary strategic matters3. Accordingly, the Councilswill need to continue to engage and work with each other to satisfactorily address any cross boundary strategic issues.</p>	Noted	No change to NSF

		<p>Central Norfolk Strategic Framework</p> <p>Any issues of unmet housing need arising from the relevant authorities in the HMA must be fully considered through the preparation of Local Plans, working under the requirements of the DtC. To achieve this, it is vital that this matter is carefully explored through joint working with all local planning authorities within the HMA, together with any other relevant local authorities that the HMA has a clear functional relationship with. Where necessary, a strong policy mechanism will be required within each Local Plan to demonstrate that unmet housing needs arising from any relevant authorities and those with a clear functional relationship will be met during the plan period.</p> <p>The need to tackle any issues of unmet housing need through the plan making process was highlighted in an appeal decision at Land off Watery Lane, Curborough, Lichfield which was recovered by the Secretary of State (SoS) and determined in a letter dated 13th February 2017. At paragraph 40 of the SoS's decision letter, the distinct possibility of Lichfield having to provide for a proportion of Birmingham's unmet housing need through the local plan making process is highlighted:</p> <p>"... while there is a distinct possibility of Lichfield having to provide for some of Birmingham's housing need, there is a mechanism for a review in the Local Plan and it would be inappropriate now to speculate on any contribution by Lichfield. As such the Secretary of State agrees that this should not be considered when assessing the merits of this appeal scheme."</p> <p>Although it was considered inappropriate to speculate on any contribution towards Birmingham's unmet needs within Lichfield in the context of an appeal made under Section 78 of the Town and Country Planning Act 1990, this decision makes it clear that any issues of unmet development needs must be addressed through the local plan making process. Accordingly, it is important that the Strategic Framework sets out a clear approach to dealing with any unmet housing needs which may occur over the plan period. The Strategic Framework should include an agreement setting out a clear mechanism of how growth will be apportioned and how each authority should include a policy within each Local Plan in the HMA should any authority be unable to meet its housing needs in full.</p>	Noted	No change to NSF
ANON-3C85-CA39-K	Salhouse Parish Council	<p>As a Parish Council we have concerns about how our voice will be heard with the next level, the District Council, and how much influence we will have on the decision making process.</p> <p>As the Parish Council we have knowledge of the village and local area and have concerns that our opinions and recommendations will not be listened to as we are at the lower level of the consultation process. An example for Salhouse is the Neighbourhood Plan which has recently been adopted, yet there is no mention of Neighbourhood Plans within the document.</p> <p>We feel there is not enough information given as to how this Strategic Plan will be delivered.</p>	Noted	No change to NSF
BHLF-3C85-CACC-D	South Norfolk Council	<p>Preamble</p> <p>The response below is an officer-only response at this stage, but it has been informed by comments made at the meeting of the Council's Regulation and Planning Policy Committee on 20th September 2017. The Council will submit its formal response following consideration at Cabinet on 9th October 2017, and so there may be some modifications to the response below.</p> <p>Response</p> <p>South Norfolk Council has considered the draft NSF and believes that it is, overall, a very useful and significant document, which will assist all Norfolk authorities in discharging their ongoing Duty to Co-operate requirements. It is also likely to put the Norfolk local authorities in a good position to meet the emerging requirements to produce a Statement of Common Ground with neighbouring authorities (as proposed in the current consultation on Planning for the right homes in the right places: consultation proposals).</p> <p>Overarching diagram</p> <p>Finally, the Council asserts that the NSF would be improved with the inclusion, early on, of a "bubble" diagram, showing how the NSF relates to current and emerging Local Plans, Neighbourhood Plans, the NPPF and other relevant documents, so that it can easily be understood by all.</p>	We would be happy to include any overarching diagram provided by South Norfolk DC.	No change to NSF
BHLF-3C85-CAFA-E	Marine Management Organisation	<p>Thank you for giving the Marine Management Organisation the opportunity to comment on the Norfolk Strategic Framework.</p> <p>It is pleasing to note reference to marine/coastal matters such as ports, the AONB, and Shoreline Management Plans.</p> <p>I am not sure where reference would best fit given the nature of the document, but consideration of the East Inshore and Offshore Marine Plan would increase the soundness of the document.</p> <p>I know you will have received the standard lines already, but the section of these that you may wish to consider for the above is:</p> <p>As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe.</p> <p>You may also wish to consider referencing specific policy from the marine plans where relevant eg PS3 around port development, objective 8 in support of marine protected areas, and GOV1 around infrastructure provision to support marine activities.</p>	General	Agree there's a need to make a reference, this will be added to the NSF in section 3