

Planning Policy & Built Heritage Working Party



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Wednesday, 13 November 2024

A meeting of the **Planning Policy & Built Heritage Working Party** of North Norfolk District Council will be held in the **Council Chamber - Council Offices** on **Thursday, 21 November 2024** at **10.00 am**.

At the discretion of the Chairman, a short break will be taken after the meeting has been running for approximately one and a half hours

Members of the public who wish to ask a question or speak on an agenda item are requested to notify the committee clerk before 10am on the Thursday before the meeting and arrive at least 15 minutes before the start of the meeting. This is to allow time for the Committee Chair to rearrange the order of items on the agenda for the convenience of members of the public.

Further information on the procedure for public speaking can be obtained from Democratic Services, Tel: 01263 516108, Email: Lauren.Gregory@north-norfolk.gov.uk.

Anyone attending this meeting may take photographs, film or audio-record the proceedings and report on the meeting. Anyone wishing to do so must inform the Chairman. If you are a member of the public and you wish to speak on an item on the agenda, please be aware that you may be filmed or photographed.

Please note that this meeting is livestreamed:

<https://www.youtube.com/channel/UCsShJeAVZMS0kSWcz-WyEzg>

Please note that Committee members will be given priority to speak during the debate of agenda items

Emma Denny

Democratic Services Manager

To: Cllr M Hankins, Cllr A Varley, Cllr M Batey, Cllr H Blathwayt, Cllr A Brown, Cllr N Dixon, Cllr P Fisher, Cllr P Heinrich, Cllr V Holliday, Cllr L Paterson, Cllr J Punchard and Cllr J Toyne

All other Members of the Council for information.

Members of the Management Team, appropriate Officers, Press and Public



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

If you would like any document in large print, audio, Braille, alternative format or in a different language please contact us

Chief Executive: Steve Blatch

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A G E N D A

1. APOLOGIES FOR ABSENCE

2. PUBLIC QUESTIONS

3. MINUTES

1 - 12

To approve as a correct record the Minutes of a meeting of the Working Party held on Thursday, 10th October 2024.

4. ITEMS OF URGENT BUSINESS

To determine any other items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act 1972.

5. DECLARATIONS OF INTEREST

13 - 18

Members are asked at this stage to declare any interests that they may have in any of the following items on the agenda. The Code of Conduct for Members requires that declarations include the nature of the interest and whether it is a disclosable pecuniary interest. Members are requested to refer to the attached guidance and flowchart.

6. NORFOLK GREEN INFRASTRUCTURE AND RECREATIONAL IMPACT AVOIDANCE AND MITIGATION STRATEGY

19 - 122

Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy	
Executive Summary	The purpose of this report is to consider progress made on the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy and to endorse the new Action Plan and governance arrangements following endorsement by the Norfolk Strategic Framework.
Options considered.	Not to endorse the Action Plan.
Consultation(s)	The Action Plan has been informed by stakeholder engagement and community events
Recommendations	Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that: I. The Action Plan and Governance arrangements are endorsed II. Nominate appropriate Member to sit on the GIRAMS board.
Reasons for recommendations	To Implement the GIRAMS and fulfil the Councils' responsibilities in relation to Habitat Regulation

Background papers	<u>Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy March 2021.</u>
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Wards affected	All
Cabinet member(s)	Cllr Andrew Brown, Portfolio Holder for Planning & Enforcement
Contact Officer	Iain Withington, Acting Planning Policy Manager <u>iain.withington@north-norfolk.gov.uk</u>

7 PLANNING IN HEALTH PROTOCOL

123 - 160

Planning In Health Protocol	
Executive Summary	The purpose of this report is to consider progress made on the Planning in Health Protocol following endorsement by the Norfolk Strategic Framework
Options considered.	Not to endorse the Protocol.
Consultation(s)	The Action Plan has been informed by stakeholder engagement and the Norfolk Strategic Framework
Recommendations	Members of the Planning Policy & Built Heritage Working Party: <ol style="list-style-type: none"> I. note the updated content and the new approach to embedding health and wellbeing in spatial planning and II. recommend to Cabinet that the revised Planning for Health Protocol be used when preparing Local Plans and determining planning applications.
Reasons for recommendations	To ensure appropriate consideration of Health in Planning
Background papers	Health Protocol

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown, Portfolio Holder for Planning & Enforcement

Contact Officer	Iain Withington, Acting Planning Policy Manager Iain.withington@north-norfolk.gov.uk
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8. ANNUAL MONITORING REPORT - PRESENTATION

9. EXCLUSION OF PRESS AND PUBLIC

To pass the following resolution (if necessary):

“That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A (as amended) to the Act.”

PLANNING POLICY & BUILT HERITAGE WORKING PARTY

Minutes of the meeting of the Planning Policy & Built Heritage Working Party held on Thursday, 10 October 2024 at the Council Chamber - Council Offices at 10.00 am

Committee

Members Present:

Cllr M Hankins (Chairman)	Cllr A Varley (Vice-Chairman)
Cllr M Batey	Cllr A Brown
Cllr N Dixon	Cllr V Holliday
Cllr P Heinrich	
Cllr J Toye	

Members also attending:

Cllr K Toye

Officers in Attendance:

Director for Place and Climate Change
Acting Planning Policy Manager
Senior Planning

Apologies for Absence:

Cllr H Blathwayt
Cllr L Paterson
Cllr J Punchard
Cllr P Fisher

10 APOLOGIES FOR ABSENCE

Apologies for absence were received from Cllr L Paterson, Cllr J Punchard, Cllr H Blathwayt and Cllr P Fisher.

11 PUBLIC QUESTIONS

None received.

12 MINUTES

The Minutes of the Planning Policy & Built Heritage Working Party meeting held Thursday 18th July were approved as a correct record.

13 ITEMS OF URGENT BUSINESS

None.

14 DECLARATIONS OF INTEREST

None.

15 LOCAL PLAN EXAMINATION: MAIN SOUNDNESS ISSUES & ACTION PLAN

The Acting Planning Policy Manager introduced the Officer's report and recommendations. Regarding the Action Plan (Appendix 2), the Acting Planning Policy Manager advised that this Plan sought to address the

soundness issues raised by the Planning Inspector. Subject to Member endorsement, the Team intended to conduct a further six weeks of public consultation starting around the 6th of November. Following the proposed public consultation, additional hearings would be held with the Inspector, at which time all the main and additionally proposed modifications would be consolidated and subjected to sustainability appraisals and habitat regulations assessments.

The Acting Planning Policy Manager stressed that the Action Plan presented to the Committee was the minimum approach necessary. Further options had been considered, which were outlined in section four of the Officer's report.

The Acting Planning Policy Manager provided the recent history behind the Local Plan and updated the Working Party on developments since the 18th of July meeting. He noted that in the Inspector's July Letter (Appendix 1), the Inspector advised of three main soundness issues that needed to be addressed before the examination could proceed. These issues, detailed in 2.2 of the Officer's report, included a shortfall in housing provision, a challenge to small growth village provision, and updates required to the Gypsy and Traveller evidence base to reflect a change in definition used by the Government in 2023.

Regarding the shortfall in overall dwellings, the Acting Planning Policy Manager advised that this was due to changes to the plan period, which had shifted at the Inspector's request from 2016–2036 to 2024–2040. The Inspector had discounted those sites delivered in the intervening years and had further moved some of those sites back in the period due to concerns about when delivery might start. Planning permission had been granted for some of the sites included within the emerging Plan but would achieve fewer dwellings than had been allocated. Other sites had been deleted, including Weybourne Road, Sheringham (West Wood), which had been built. Critically, the Acting Planning Policy Manager advised that the Council's argument regarding deviation from the Standard Methodology had been lost. As a consequence, the dwelling requirement per annum had increased from 480 dwellings per year to 557 dwellings per year.

In terms of small growth villages, the Acting Planning Policy Manager stated that the Inspector accepted that the approach taken was potentially sound. The Acting Planning Policy Manager noted that similar approaches were taken by neighbouring authorities in Norfolk. However, the Inspector had concerns regarding the effectiveness of this approach in delivering growth and supporting the rural economy.

Regarding the Gypsy and Traveller policy, the Inspector considered the evidence supplied to be insufficiently up to date due to the change in definition. He requested the Council to commission a new study and identify

more current data based on the revised 2023 definition.

The Acting Planning Policy Manager made it clear to the Working Party that there was only one opportunity to get the Plan sound and address the issues raised. He confirmed that the new Housing Minister had written to the Planning Inspectorate advising of a change in practice regarding Local Plans. Previously, it was understood that the Inspectorate was broadly supportive to the extent of whatever it took to get a plan approved. Consequently, some Local Authorities had taken advantage of this position and went years without having an adopted Local Plan. The Acting Planning Policy Manager affirmed that following the exchange of letters, it was considered that a pragmatic view had its limits, and the Inspectorate was instructed to take a harder line: 'Pragmatism should not be used to address fundamental issues with the soundness of a plan which would likely require pausing or delaying the examination process for more than six months overall'. Copies of the letters were provided in Appendix 1.D.

The Acting Planning Policy Manager confirmed that the Inspector had seen the Working Party Agenda and was cautiously encouraged by the proposals, noting that much work had been undertaken to address the main soundness issues. He considered the additional housing allocation, if supported by Members and upheld to public scrutiny, would be a good basis for the examination to proceed. In particular, the additional extended allocations and additional small growth villages should be reliable sources for extra housing. Furthermore, the Inspector emphasized the limits to pragmatism, meaning there was really only one chance for the soundness issues to be addressed. The Acting Planning Policy Manager affirmed it was important that the Council move forward with the Local Plan, and at pace.

The Acting Planning Policy Manager detailed each of the Appendices provided.

The Inspector considered that 1,000 dwellings would be required to address the shortfall and strongly indicated that this would be seen as a minimum, expressing a preference for a higher number. The Inspector sought certainty of delivery, which would be best achieved through allocated sites. The Acting Planning Policy Manager agreed that it would be sensible to include a higher target figure to accommodate any unforeseen slippages in delivery, and emphasized the need for flexibility, noting that ongoing issues with Nutrient Neutrality might cause delays.

The Acting Planning Policy Manager stressed the importance of addressing the 5-year housing land supply and the need to deliver sites early in the plan period. Failure to address the 5-year housing land supply position would be an issue at examination.

At this stage of the Local Plan, the Working Party was asked to consider the principle of allocations rather than specific details, which would come at the planning application stage. Some sites were being progressed through pre-application advice, which is a separate process that would be scrutinized separately at the Development Committee. The Acting Planning Policy Manager confirmed that all the sites outlined in the Action Plan were considered by officers to be necessary to provide a sound basis for progressing with the next hearing sessions. He acknowledged that some of the sites were controversial and confirmed that the consultation feedback received would be provided to the Inspector and discussed at examination hearings

Members debate

- a. Cllr N Dixon confirmed that it was made clear a pragmatic and timely approach was required, and acknowledged the risks should the Plan fail to be delivered in time. He considered these risks to be paramount. Failing to deliver the plan, which had been over six years in the making, would not serve the residents or businesses of North Norfolk well and might lead to chaos. Cllr N Dixon stressed the need to expedite the Local Plan with minimum delay. He confirmed that he was content with the suggested approach and the outlined action plan.

Cllr N Dixon suggested that each Ward Member be asked to study the Action Plan and the proposals located within their Ward, particularly those small growth villages which were late additions to the Plan and had not been subject to the same degree of examination. He noted that within his own Ward, there were some small discrepancies with the maps that required amendments before being consulted upon, but he considered there to be enough time for this to be sorted before the 6th November target date.

- b. Cllr P Heinrich endorsed the views expressed by Cllr N Dixon regarding the need to act swiftly and acknowledged the risks associated with failing to have a Local Plan in place.

As a Local Member for North Walsham, he expressed his grave concerns for site NW16. He noted that North Walsham was expected to take an additional 2,200 new dwellings without this new proposed site. He reflected that the essential access from Cromer Road into the industrial estate was not viable at this time, which would impact economic growth in the town and be exacerbated by further population growth. Cllr P Heinrich noted this site had been previously rejected,

having been considered remote from the Town Centre and associated services, located within the designated countryside, and it was felt that development would have an adverse effect on the landscape. He considered that this development would place additional pressures on the local GP surgery, which could not accommodate existing demand, and argued there was not a safe walking route to local schools, the medical centre, or town centre from the site, resulting in reliance on private vehicles which would congest the medieval streets. In addition, further pressures would be placed on Coltishall on top of the increased traffic movements anticipated for North Walsham West, with many residents seeking employment in Norwich. Cllr P Heinrich argued that traffic assessment modelling for North Walsham West might need to be revisited if NW16 were allocated, which would be at a cost. The Local Member stressed the need for affordable housing and argued the Local Plan should prioritize homes for local people.

He expressed some sympathy with the Planning Inspector, who was responding to the mandate issued by central government, but concluded it was unreasonable and unrealistic to increase the housing target so significantly, particularly with North Walsham set to accommodate a significant proportion of Local Plan development already.

Cllr P Heinrich accepted additional growth for small villages, which may help bring vitality to rural communities through the influx of younger families.

- c. The Chairman agreed infrastructure considerations were important and affirmed that views could be expressed through the 6-week consultation period.
- d. Cllr V Holliday accepted the need for pragmatism and the need to proceed with the Local Plan consultation. However, she reflected that additional growth in Blakeney and Weybourne would be unpopular, and the loss of Clifton Park was regrettable. With respect to the Gypsy and Travellers policy, Cllr V Holliday considered more could have been detailed regarding the difference in longevity for travellers and reduced educational attainments. She asked that thought be given to this matter when considering the locality of Gypsy and Traveller sites.
- e. Cllr A Brown extended a warm welcome to the Chairman and wished him success in his role.

Cllr A Brown endorsed the Officer recommendation and expressed his frustration with the seismic change in methodology mandated by the new government, which he felt took power away from Local Authorities to determine their own housing need. He felt the prescriptive housing targets were unrealistic and stated it was developers and not the Local Authority who would provide new housing and ensure delivery. Cllr A Brown noted that between 2001 and 2024, a total of 8,604 new dwellings were delivered in the district, equating to 374 per annum. Officers had, through the emerging Local Plan, sought to challenge the standard methodology, to use the 2016 census figures as opposed to the 2014 figures, establishing a 480 dwellings per annum delivery target. This then increased to 557 dwellings during the Plan process, with the Inspector subsequently communicating that 943 dwellings per annum should be delivered.

Cllr A Brown questioned the government's justification for the 70% increase for North Norfolk, noting that London had a minus target, though recognized the issue was worse in West Norfolk with an 80% increase. He felt central government failed to give proper consideration to the constraints in North Norfolk – 45 miles of coastline, 35% of the district located within the designated national landscape, 81 conservation areas, and 56% of the district affected by Nutrient Neutrality. He argued that the prescriptive approach mandated did not allow local communities to make their own decisions and devalued the power of consultation. This was further exacerbated by the 6-month timeframe to adopt the plan.

Cllr A Brown thanked officers for their hard work and noted the immense pressure the team had been under since July.

- f. Cllr J Toye noted the increase in housing was government-driven and recognized the risks which would arise if the Local Authority failed to have a Local Plan. He reflected that the Plan period had been changed, allowing more time to develop the Plan, and considered that the pressures noted with respect to infrastructure were pre-existing. Cllr J Toye stated it was incumbent on the Local Authority, outside of the Working Party, through devolution deal discussions to forge links and work collaboratively to ensure a connected infrastructure network. With respect to small growth villages, Cllr J Toye felt consideration needed to be given to transport and reflected that while it would not be realistic for there to be a bus in every village, a bus in the neighboring village a mile away might be sufficient. He considered a holistic approach was required.

- g. The Chairman encouraged engagement by Local Members with parish councils regarding the Local Plan.
- h. Cllr M Batey stated the Council had little choice but to proceed with the consultation and reflected that there might well be local residents who were dissatisfied with the proposed changes.
- i. Cllr A Varley thanked Officers for their fantastic work. He stated that it was important Local Members engaged with their communities on this matter to ensure local knowledge and views were shared through the public consultation. As Local Member for Ludham, he stated that he was broadly in support of the proposal but stressed the need for affordable housing, cautioning that developers had historically watered down the amount of affordable housing through viability assessments. Within the Ludham and Hoveton area, there was local concern about existing foul drainage capacity, with views expressed that additional development might exacerbate this issue
- j. Cllr N Dixon advised that his views expressed at the Working Party were as an appointee of the Working Party, giving due consideration to the district as a whole, rather than speaking as a Local Ward Member for Hoveton and Tunstead. While he shared the concerns expressed by Cllr P Heinrich regarding North Walsham and transport links, he recognized the need to assess the Plan more broadly. Local Members would be afforded the opportunity to share their views through the consultation. Cllr N Dixon noted that the delivery of the Plan was a separate matter, presenting challenges that the Local Authority did not have direct control over. Developers and the market more broadly would steer what was delivered and when. Cllr N Dixon stated that the risks associated with not adopting a Plan were unacceptable and remained paramount in his mind.

Cllr N Dixon considered there might be some merit in clustering small villages together, recognizing that they could support and contribute to one another, ensuring greater viability.

Cllr N Dixon stressed the importance of Local Ward Members engaging with the Local Plan, reviewing the Action Plan, verifying if details were correct, and communicating the proposals with their Local Communities and Parish Councils.

- k. The Acting Planning Policy Manager thanked Cllr N Dixon for his comments. He stated this was a strategic plan that sets the framework

for the Council and emphasized the importance of moving the Plan forward to allow policy changes to be introduced. He confirmed the documents provided to the Working Party were working documents, with ongoing work to finalize them until the consultation was launched. The Acting Planning Policy Manager advised he would write to all Members and Parish Councils advising them of the changes.

- l. Cllr V Holliday considered the need for pragmatism and noted that the rush for Local Plan adoption did not serve North Norfolk well with respect to homelessness, pointing out that the prescriptive housing targets did not address matters of affordability.
- m. The Senior Planning Officer outlined the site proposals and provided a brief overview of the methodology behind the choices made. He confirmed the sites now included had previously been discussed. Given the acute time constraints, the approach was not taken to undertake a call for new sites, as it was recognized that such sites might not ultimately be considered suitable. He noted that many promoters of the sites had continued to pursue the sites even though they had not been included in the Plan, so a significant amount of technical information was available.

Category A sites were those which had been previously assessed and considered suitable but not selected for allocation due to strategic reasons. This allocation also included sites already detailed in the emerging Plan which had been proposed for extension.

Category B sites required a more detailed review of the site assessment process, considering those sites which had been previously discounted from the original process but which had some capacity to come forward, albeit on a smaller scale. The Senior Planning Officer advised that C19 (Land at Compit Hills, Cromer) was discounted on highways grounds, and H35 (Land at Horning Road, Hoveton) was discounted due to its countryside designation and lack of evidence to justify whether mitigation would be able to overcome this policy constraint. He noted that the site promoters for Land at Horning Road had keenly pursued the site's inclusion in the Plan in recent weeks. Officers were open to reviewing the inclusion of the site upon Member instruction.

The Senior Planning Officer advised that some of the site boundary maps had been updated and summarized the proposed changes.

- n. The Senior Planning Officer (CD) outlined the changes to the small growth villages and reiterated the Inspector's guidance that the Council explore this particular tier of distribution growth across the district. A review of small growth villages had been undertaken based on the Inspector's advice, details of which were set out in Appendix 4. It was noted that Beeston Regis was an anomaly to the methodology, as the key services were located in the adjacent settlement (Sheringham). However, given these services were within accessible range, this scored Beeston Regis as being suitable for inclusion. Two sites had been discounted out of the 12 detailed in the review, with details contained in the appendix.

The Senior Planning Officer (CD) advised that 9% growth was proposed for the small growth villages. It was noted that the NPPF sought approximately 10% growth on small to medium scale development sites. The inclusion of the 10 additional small growth sites to the existing list at 9% growth would provide approximately 873 dwellings.

Alternative villages were considered which offered secondary level services, but not enough to qualify at this time for inclusion in the small growth village strategy. The Senior Planning Officer (CD) commented that these villages might be considered appropriate for infill development, should this be of interest to members.

- o. The Acting Planning Policy Manager stressed that exploring additional options at this stage might risk the Plan, given that additional work would be required, causing a time delay. He confirmed that clustering (dispersed growth) of villages had been considered as an option in the Local Plan but had been rejected some time ago. The Acting Planning Policy Manager welcomed consideration of clustering with future Local Plans, noting that this would be beneficial in meeting higher targets anticipated to come through the NPPF.
- p. Cllr N Dixon considered it important, as a matter of contingency planning, to have a variety of options available should issues with deliverability occur at some of the designated sites.
- q. Cllr J Toye asked if services located outside the district, but in close proximity to villages and towns within the district, were considered for their service value.
- r. The Senior Planning Officer (CD) advised that while officers were spatially aware of the nearest towns to small settlements, this wasn't

given a great deal of consideration. Officers instead focused on matters of sustainability and whether residents would be reliant on private cars to access day-to-day services. The Senior Planning Officer (CD) confirmed the 'main road' descriptor for secondary services incorporated public transport links.

- s. Cllr P Heinrich reflected that it was important to consider where residents of small growth villages perceived their main services to come from, as while the Local Authority might consider residents would use the services in one place, the residents might instead use services elsewhere.

Cllr P Heinrich agreed the Working Party must consider the whole district in its recommendation, and while he held reservations about specific sites, he acknowledged the need to act quickly and proceed with public consultation.

- t. Cllr J Toye advised that as Portfolio Holder for Sustainable Growth, work was underway for a rural strategy. He agreed it was important to understand where residents used services.
- u. The Acting Planning Policy Manager outlined the Gypsy and Traveller changes detailed in the officer's report.

The Acting Planning Policy Manager confirmed the consultation arrangements. The dates provided were designed to ensure responses were received before Christmas, allowing time for comments to be summarized and provided to the Inspector. It was hoped this would expedite dates for hearings early in 2025. Online responses to the consultation would be preferred, though written responses would be accepted.

- v. Cllr A Brown asked where the statutory notices would be located.
- w. The Acting Planning Policy Manager advised these would be located on the Council's website, issued to all those who had contributed to the Plan, sent to Town and Parish Councils, and advertised in the local press.
- x. Cllr V Holliday asked if paper versions of the consultation document and response form would be available.
- y. The Acting Planning Policy Manager advised the documents would be

available from the council offices in library form. If a request was received from a parish council for a hard copy, this would typically be accepted. Hard copies of the response form were available as standard.

Cllr N Dixon proposed the Officer's recommendation. Cllr J Toye seconded the motion.

UNANIMOUSLY RESOLVED

Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that:

- I. the draft Action Plan is endorsed and taken forward to the timelines outlined;**
- II. the updated evidence and background papers are endorsed;**
- III. the consultation arrangements and communication Plan are endorsed;**
- IV. that delegated authority is given to the Acting Planning Policy Manager in consultation with the Planning Portfolio Holder to finalise the Action Plan and consultation material and continue to respond to the Inspectors questions during the Examination period and hearing(s)**

16 PLANNING REFORM UPDATE

The Acting Planning Policy Manager introduced the report, which was for information only.

17 NPPF CONSULTATION RESPONSE

The Acting Planning Policy Manager introduced report, which was for information only. A summary of the response to the public consultation was detailed within the agenda. The most consequential change related to a revised approach for housing growth, referred to by Cllr A Brown in the prior item.

18 EXCLUSION OF PRESS AND PUBLIC

The meeting ended at 11.42 am.

Chairman

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Registering interests

Within 28 days of becoming a member or your re-election or re-appointment to office you must register with the Monitoring Officer the interests which fall within the categories set out in **Table 1 (Disclosable Pecuniary Interests)** which are as described in "The Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012". You should also register details of your other personal interests which fall within the categories set out in **Table 2 (Other Registerable Interests)**.

"Disclosable Pecuniary Interest" means an interest of yourself, or of your partner if you are aware of your partner's interest, within the descriptions set out in Table 1 below.

"Partner" means a spouse or civil partner, or a person with whom you are living as husband or wife, or a person with whom you are living as if you are civil partners.

1. You must ensure that your register of interests is kept up-to-date and within 28 days of becoming aware of any new interest, or of any change to a registered interest, notify the Monitoring Officer.
2. A 'sensitive interest' is as an interest which, if disclosed, could lead to the councillor, or a person connected with the councillor, being subject to violence or intimidation.
3. Where you have a 'sensitive interest' you must notify the Monitoring Officer with the reasons why you believe it is a sensitive interest. If the Monitoring Officer agrees they will withhold the interest from the public register.

Non participation in case of disclosable pecuniary interest

4. Where a matter arises at a meeting which directly relates to one of your Disclosable Pecuniary Interests as set out in **Table 1**, you must disclose the interest, not participate in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest, just that you have an interest. Dispensation may be granted in limited circumstances, to enable you to participate and vote on a matter in which you have a disclosable pecuniary interest.
5. Where you have a disclosable pecuniary interest on a matter to be considered or is being considered by you as a Cabinet member in exercise of your executive function, you must notify the Monitoring Officer of the interest and must not take any steps or further steps in the matter apart from arranging for someone else to deal with it

Disclosure of Other Registerable Interests

6. Where a matter arises at a meeting which **directly relates** to one of your Other Registerable Interests (as set out in **Table 2**), you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting but otherwise must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

Disclosure of Non-Registerable Interests

7. Where a matter arises at a meeting which **directly relates** to your financial interest or well-being (and is not a Disclosable Pecuniary Interest set out in Table 1) or a financial interest or well-being of a relative or close associate, you must disclose the interest. You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation. If it is a 'sensitive interest', you do not have to disclose the nature of the interest.
8. Where a matter arises at a meeting which **affects** –
 - a. your own financial interest or well-being;
 - b. a financial interest or well-being of a relative, close associate; or
 - c. a body included in those you need to disclose under Other Registrable Interests as set out in **Table 2**

you must disclose the interest. In order to determine whether you can remain in the meeting after disclosing your interest the following test should be applied

9. Where a matter **affects** your financial interest or well-being:
 - a. to a greater extent than it affects the financial interests of the majority of inhabitants of the ward affected by the decision and;
 - b. a reasonable member of the public knowing all the facts would believe that it would affect your view of the wider public interest

You may speak on the matter only if members of the public are also allowed to speak at the meeting. Otherwise you must not take part in any discussion or vote on the matter and must not remain in the room unless you have been granted a dispensation.

If it is a 'sensitive interest', you do not have to disclose the nature of the interest.

10. Where you have a personal interest in any business of your authority and you have made an executive decision in relation to that business, you must make sure that any written statement of that decision records the existence and nature of your interest.

Table 1: Disclosable Pecuniary Interests

This table sets out the explanation of Disclosable Pecuniary Interests as set out in the [Relevant Authorities \(Disclosable Pecuniary Interests\) Regulations 2012](#).

Subject	Description
Employment, office, trade, profession or vocation	Any employment, office, trade, profession or vocation carried on for profit or gain. [Any unpaid directorship.]
Sponsorship	Any payment or provision of any other financial benefit (other than from the council) made to the councillor during the previous 12-month period for expenses incurred by him/her in carrying out his/her duties as a councillor, or towards his/her election expenses. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract made between the councillor or his/her spouse or civil partner or the person with whom the

	<p>councillor is living as if they were spouses/civil partners (or a firm in which such person is a partner, or an incorporated body of which such person is a director* or a body that such person has a beneficial interest in the securities of*) and the council —</p> <p>(a) under which goods or services are to be provided or works are to be executed; and</p> <p>(b) which has not been fully discharged.</p>
Land and Property	<p>Any beneficial interest in land which is within the area of the council.</p> <p>‘Land’ excludes an easement, servitude, interest or right in or over land which does not give the councillor or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners (alone or jointly with another) a right to occupy or to receive income.</p>
Licenses	<p>Any licence (alone or jointly with others) to occupy land in the area of the council for a month or longer</p>
Corporate tenancies	<p>Any tenancy where (to the councillor’s knowledge)—</p> <p>(a) the landlord is the council; and</p> <p>(b) the tenant is a body that the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were spouses/civil partners is a partner of or a director* of or has a beneficial interest in the securities* of.</p>
Securities	<p>Any beneficial interest in securities* of a body where—</p> <p>(a) that body (to the councillor’s knowledge) has a place of business or land in the area of the council; and</p> <p>(b) either—</p> <p>(i) the total nominal value of the securities* exceeds £25,000 or one hundredth of the total issued share capital of that body; or</p> <p>(ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the councillor, or his/her spouse or civil partner or the person with whom the councillor is living as if they were</p>

	spouses/civil partners has a beneficial interest exceeds one hundredth of the total issued share capital of that class.
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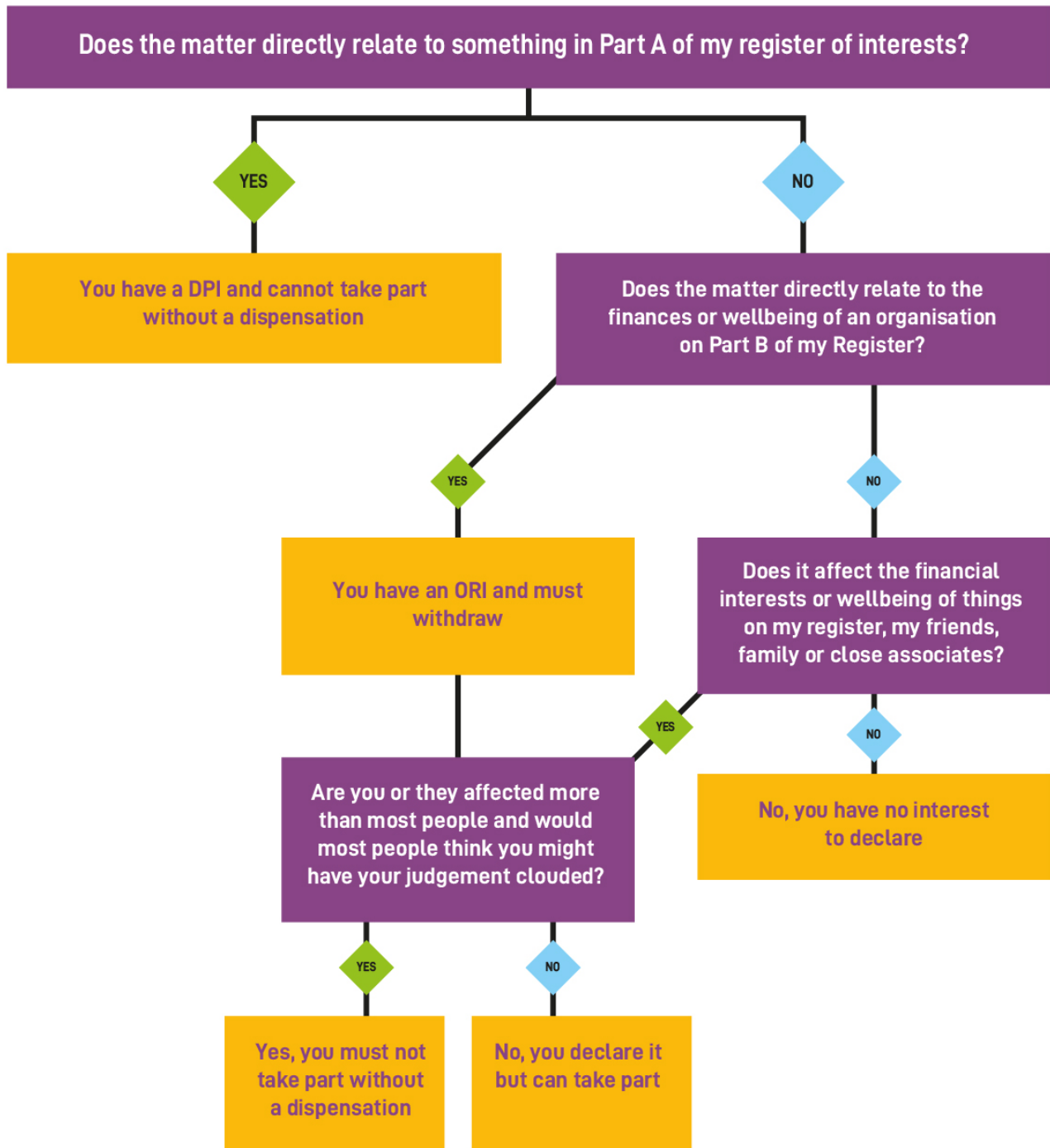
* 'director' includes a member of the committee of management of an industrial and provident society.

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

Table 2: Other Registrable Interests

You have a personal interest in any business of your authority where it relates to or is likely to affect:

- a) any body of which you are in general control or management and to which you are nominated or appointed by your authority
- b) any body
 - (i) exercising functions of a public nature
 - (ii) any body directed to charitable purposes or
 - (iii) one of whose principal purposes includes the influence of public opinion or policy (including any political party or trade union)



REPORT TITLE	Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy
Executive Summary	The purpose of this report is to consider progress made on the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy and to endorse the new Action Plan and governance arrangements following endorsement by the Norfolk Strategic Framework.
Options considered.	Not to endorse the Action Plan.
Consultation(s)	The Action Plan has been informed by stakeholder engagement and community events
Recommendations	<p>Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that:</p> <p>I. The Action Plan and Governance arrangements are endorsed</p> <p>II. Nominate appropriate Member to sit on the GIRAMS board.</p>
Reasons for recommendations	To Implement the GIRAMS and fulfil the Councils' responsibilities in relation to Habitat Regulation
Background papers	<u>Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy March 2021.</u>

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown, Portfolio Holder for Planning & Enforcement
Contact Officer	Iain Withington, Acting Planning Policy Manager <u>iain.withington@north-norfolk.gov.uk</u>

Links to key documents:	
Corporate Plan:	The report addresses all five themes: Our Greener Future, Developing Our Communities, Meeting Our Housing Need, Investing in Our Local Economy and Infrastructure and A strong, Responsible & Accountable Council.

Medium Term Financial Strategy (MTFS)	N/A
Council Policies & Strategies	Adopted and emerging local plan

Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	<p>Norfolk Strategic Framework 23rd October 2024</p> <ul style="list-style-type: none"> • PPBHWP 14 December 2020 • Cabinet 1 February 2021

1. Purpose of the report

- 1.1 The purpose of this report is to consider progress made on the Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy and to endorse the new Action Plan and governance arrangements following endorsement by the Norfolk Strategic Framework.

2. Introduction & Background

- 2.1 Habitat Regulation Assessments (HRAs) are a legal requirement for Local Plans, are a soundness and legal consideration at examination, and a legal consideration at planning application stage. These Assessments are undertaken to ensure that the Plans policies and proposals will not result in any likely significant effects on internationally recognised wildlife sites and, where the potential for such impacts arises, implement an agreed process of mitigation.
- 2.2 All Norfolk authorities Local Plans have been subject to HRA and conclude that the in-combination growth that is planned has the potential to have significant adverse impacts on designated wildlife sites (with the exception of the Broads Authority).
- 2.3 Local Planning Authorities (LPA) are the designated competent bodies and as such are responsible for ensuring that policies and proposals contained in their Local Plans do not have an adverse effect on the integrity of European sites.
- 2.4 Recreational pressures from growth and its impact on designated Habitats Sites is a cross-boundary issue which affects all Local Plans in Norfolk. Individual authorities can only address the effects of growth within their own boundaries. The best available evidence categorically and irrevocably identifies likely significant effects from in combination growth as a result of cross boundary growth. With the best available evidence now clearly

showing that the levels of growth proposed trigger in combination effects across the LPAs from growth that originates outside each LPA, the issue is better addressed at a more strategic level similar to the approach taken in many other parts of the country

What has been completed?

- 2.5 Working through Norfolk Strategic Planning Member Forum, the member authorities have developed a single shared approach to first understand the pressures and impacts of residential growth on European protected sites and then how to address potential impacts.
- 2.6 The Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy was endorsed in 2021 and all Local Authorities have now introduced the tariff for qualifying developments.
- 2.7 Alongside the implementation of the tariff members requested the review of the mitigation package. The key principle of the review was to provide a more detailed action plan of mitigation through:
- A detailed review of all individual Natura 2000 sites looking at site improvement plans, existing access and visitor management measures and identify other proposed measures within the protected sites
 - The identification of the degree of intervention needed to avoid likely significant effects based on visitor increases expected
 - Working with site managers/landowners to identify and prioritise the key projects and priorities
 - Maximising use of existing resources at sites
 - Ensuring the action plan covers the period to 2046 to align with any forthcoming local plans.
- 2.8 Footprint Ecology were commissioned in early 2023 to complete this work and an update on progress was given to members of the Norfolk Strategic Framework in January 2024. This work is now complete, and their action plan accompanies this report. The report has identified a large range of projects to be delivered across the county in the next 22 years costing £22 million. The action plan will lead to a small increase in the tariff cost per dwelling to £293.53
- 2.9 The Action Plan and Governing arrangements were agreed and authorised for local authority circulation and endorsement by Members of the Norfolk Strategic Framework on October 23rd, 2024. Attached in Appendix 1

3. Governance and Management of Fund

- 3.1 Members have already endorsed the approach at previous working party and cabinet meetings (December 2020 and February 2021). At the Member Forum held in December 2021 members agreed to the principle of exploring the option of the county council being the accountable body and hosting organisation for the Mitigation. It proved not possible to reach agreement with the county in managing the Mitigation Fund, so officers have been developing a governance process with the delivery manager role being hosted by a district council instead.

- 3.2 Norwich City Council already host the Norfolk Strategic Framework Manager and have kindly offered to host the GIRAMS delivery manager and will hold a central pool of funds for projects. However, they will not be accountable for the operation of the scheme which will remain with the districts and the board.
- 3.3 It is proposed that a board:
- Is responsible for overseeing the delivery of the mitigation identified as being required to support the planned growth for the county.
 - Agrees an annual programme of projects to be delivered by the Norfolk RAMS Mitigation Programme which will be funded wholly from the Norfolk RAMS Fund.
- 3.4 The Board would be made up of Members from all authorities support by Ecologist and/or Planning Officers from all authorities. There may be other groups that support the board in an advisory role or provide advice; this may include Natural England, The Environment Agency and Ecologists from other interested groups.
- 3.5 An Officer steering group reporting to the Norfolk Strategic Planning group created terms of reference for the overarching board and a job description for the Delivery Officer Role.
- 3.6 A Memorandum of Understand has been drafted which sets out the operation of the scheme alongside the terms of reference with Norwich City Council acting as host authority. This is now ready for endorsement by each authority and contained in Appendix 2 and Appendix 3.

4. Options

- 4.1 Whilst there is the option not to sign up to the governance arrangements there are no alternatives in place to meet the Council's legal responsibility to accord with the Habitat Regulations. In the absence of any other option the Council would leave itself open to legal challenge in relation to meeting its obligations under the Habitats Regulations with regard to individual planning applications and the policy requirements of the emerging Local Plan.

9 Legal Implications

- 9.1 Habitat Regulation Assessments (HRAs) are a legal requirement for Local Plans, are a soundness and legal consideration at examination, and a legal consideration at planning application stage. These Assessments are undertaken to ensure that the Plans policies and proposals will not result in any likely significant effects on internationally recognised wildlife sites and, where the potential for such impacts arises, implement an agreed process of mitigation.
- 9.2 Local Planning Authorities (LPA) are the designated competent bodies in relation to the Habitat Regulations and as such are responsible for ensuring that policies and proposals contained in their Local Plans do not have an adverse effect on the integrity of European sites

10 Risks

- 10.1 In the failure to implement a mitigation the Council would leave itself open to legal challenge in relation to meeting its obligations under the Habitats Regulations with regard to individual planning applications and the policy requirements of the emerging Local Plan.

11 Net Zero Target

- 11.1 No assessment has been made against the council's [Net Zero 2030 Strategy & Climate Action Plan](#)..

12 Equality, Diversity & Inclusion

- 12.1 Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to –

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 12.2 There are no direct implications on equality within this report.

13 Community Safety issues

N/A

14 Conclusion and Recommendations

Members of the Planning Policy & Built Heritage Working Party recommend to Cabinet that:

- I. The Action Plan and Governance arrangements are endorsed**
- II. Nominate appropriate Member to sit on the GIRAMS board**

Appendices

Appendix 1: Action Plan

Appendix 2: Memorandum of Understanding October 2024

Appendix 3: Board Terms of Reference

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Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

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Summary

This plan has been commissioned by Norfolk Planning Authorities to review and refine their existing mitigation approach for recreation impacts to European sites, associated with planned housing growth. It builds on the approach established in 2020 in the in the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy ('GIRAMS') and sets out detailed actions relating to mitigation measures.

The plan covers the following broad areas, many of which cover multiple European sites (i.e. Special Areas of Conservation, SACs; Special Protection Areas, SPAs; and Ramsar sites):

- Breydon Water
- Dersingham & Roydon
- East Coast
- Norfolk Valley Fens
- North Norfolk Coast
- Ouse Washes
- The Brecks
- The Broads
- The Broads SAC
- Wash

These varied sites encompass much of the Norfolk countryside. Access to the countryside is important for health and well-being, brings economic benefit to rural areas (e.g. through tourism) and helps foster connectedness with the natural environment. Access can also cause problems at sites, for example through damage, contamination, disturbance and increased fire risk. Achieving the necessary balance can be difficult and is potentially exacerbated by the cumulative effects of new housing across the county. Local planning authorities, as competent authorities under the Habitats Regulations, need to be able to rule out adverse effects on integrity as a result of housing, alone or in-combination with other plans or projects. This plan is about achieving that balance.

The sites all differ markedly in their draw for recreation, the habitats and species present and their vulnerability to recreation impacts. A wide range of organisations are involved in managing them are/or providing for recreation use. As such the plan sets a blueprint for collective working and collaboration, enabling development by ensuring adequate protection is secured. A level of developer contribution is set, based on the overall cost (£22 million) of a suite of project ideas (provided in part by potential delivery organisations), divided by the overall level of housing growth anticipated across Norfolk to 2046 (nearly 75,000 new dwellings).

The ideas for mitigation projects cover a range of interventions including infrastructure, engagement, redistributing access, monitoring (targeted at supporting the mitigation delivery) and support/collaboration across organisations. A delivery manager will coordinate the

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

mitigation and work with partners to allow them to draw on the funds and further develop projects as appropriate. The project ideas provide the outline for the mitigation – some are close to fully worked up proposals and could be implemented quickly while others are likely to require refining and review with time. The role of the delivery manager will ensure mitigation is linked to where housing growth takes place and phased to match the housing growth coming forward. Oversight and the necessary governance ensures diligence and flexibility. This provides the necessary mechanism for local planning authorities to ensure compliance with the Habitats Regulations.

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Acknowledgements

This report has been commissioned by the Norfolk Planning Authorities comprising Broadland District Council, Breckland District Council, Great Yarmouth Borough Council, The Borough Council of King's Lynn & West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council and the Broads Authority. We are grateful to Trevor Wiggett (Norwich City Council) for overseeing the work.

Thanks to the steering group comprising Natalie Beal (Broads Authority), Michael Burton (Borough Council of King's Lynn & West Norfolk), Judith Davison (Norwich City Council), Nick Fountain (Great Yarmouth Borough Council); Cherry Harper Jones (Norfolk County Council), Paul Harris (South Norfolk/Broadland District Council), Rachel Gibbs (Breckland District Council), Claire May (Borough Council of King's Lynn & West Norfolk), Keith Moore (Environment Agency), Rocio Salado-Egido (Norfolk County Council), Kerys Witton (Natural England) and Iain Withington (North Norfolk District Council).

We are grateful to a wide range of people who have provided information, project ideas and contributed to discussion around mitigation measures and visitor management at sites in Norfolk.

1. Introduction

- 1.1 This report has been commissioned by Norfolk Planning Authorities¹ to review and refine their existing mitigation approach for recreation impacts to European sites, associated with plan-led housing growth.

Legislative context

- 1.2 European sites are the cornerstone of UK nature conservation policy. Each forms part of a 'national network' of sites that are afforded the highest degree of protection in domestic policy and law. They include Special Protection Areas (SPA) classified under the 1979 Birds Directive and Special Areas of Conservation (SAC) designated under the 1992 Habitats Directive². The designations made under the European Directives still apply and the term, 'European site' remains in use. According to long-established Government policy³, European sites also comprise 'Wetlands of International Importance' (or Ramsar sites).
- 1.3 European sites have the benefit of the highest level of legislative protection for biodiversity. Public bodies, including local planning authorities, have specific duties in terms of avoiding deterioration of habitats and species for which sites are designated or classified, and stringent tests have to be met before plans and projects can be permitted. Importantly, the combined effects of individual plans or projects must be taken into account. For local planning authorities, this means that the combined effect of individual

¹ Broadland District Council, Breckland District Council, Great Yarmouth Borough Council, The Borough Council of King's Lynn & West Norfolk, North Norfolk District Council, Norwich City Council, South Norfolk Council and the Broads Authority.

² For the avoidance of doubt, the list of statutory European sites also comprises: A site submitted by the UK to the European Commission (EC) before Exit Day (a candidate SAC or cSAC) as eligible for selection as a Site of Community Importance (SCI) but not yet entered on the ECs list of SCI, until such time as the Appropriate Authority has designated the site or it has notified the statutory nature conservation body that it does not intend to designate the site. After Exit Day, no further cSACs will be submitted to the EU. Statutory European sites also include SCI included on a list of such sites by the European Commission from cSACs submitted by the UK before the UK left the EU, until such time as the UK designates the site when it will become a fully designated SAC.

³ ODPM Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System (16 August 2005), to be read in conjunction with the current NPPF, other Government guidance and the current version of the Habitats Regulations.

development proposals needs to be assessed collectively for their cumulative impact.

- 1.4 The designation, protection and restoration of European wildlife sites is embedded in the Conservation of Habitats and Species Regulations 2017, as amended, which are commonly referred to as the 'Habitats Regulations'. Importantly, the most recent amendments (the Conservation of Habitats and Species (amendment) (EU Exit) Regulations 2019⁴) take account of the UK's departure from the EU.
- 1.5 The application of the European legislation needs to be made with regard for the way in which the protective requirements should be secured by public bodies. The legislation requires public bodies to be proactive, not reactive. The overarching objective is to maintain sites and their interest features in an ecologically robust and viable state, able to sustain and thrive into the long term, with adequate resilience against natural influences. This requires public bodies to put measures in place to prevent deterioration of European sites, not to wait until there is harm occurring that needs to be rectified. Where European sites are not achieving their potential, the focus of attention by public bodies should be on restoration.
- 1.6 Public bodies are referred to as 'competent authorities' within the legislation. The duties set out within the Habitats Regulations in relation to the consideration of plans and projects are applicable in situations where the competent authority is undertaking or implementing a plan or project, or authorising others to do so. The legislation is founded on the 'precautionary principle' and it is necessary to rule out harm, rather than demonstrate impacts.

Relevant European sites

- 1.7 Norfolk is one of the richest and most important counties for biodiversity in England. Within the county there are a range of European sites encompassing estuary, coast, heathland, wetland, grassland and woodland habitats and designated for a range of species. The sites include extensive areas such as the Norfolk Broads, the North Norfolk Coast, the Wash and the

⁴ The amending regulations generally seek to retain the requirements of the 2017 Regulations but with adjustments for the UK's exit from the European Union. See Regulation 4, which also confirms that the interpretation of these Regulations as they had effect, or any guidance as it applied, before exit day, shall continue to do so.

Brecks. Smaller sites include Roydon and Dersingham Bog, and the Norfolk Valley Fens. Some of these sites support multiple designations.

- 1.8 We have reviewed all the European sites within a 5km radius of the Norfolk County Boundary in order to ascertain which need to be included in this Strategy Action Plan. A separate annex sets out the content of that review and provides context to the relevant sites. From the review we have identified 19 European sites (that fall into 8 areas/groups of sites) where the cumulative impacts from plan-led housing growth trigger a need for mitigation within this action plan. In addition, the Ouse Washes SPA/Ramsar is flagged as there is a lack of data and some uncertainty regarding the scale of impact and need for mitigation.
- 1.9 The sites and areas selected are shown in Map 1 and summarised in Table 1.

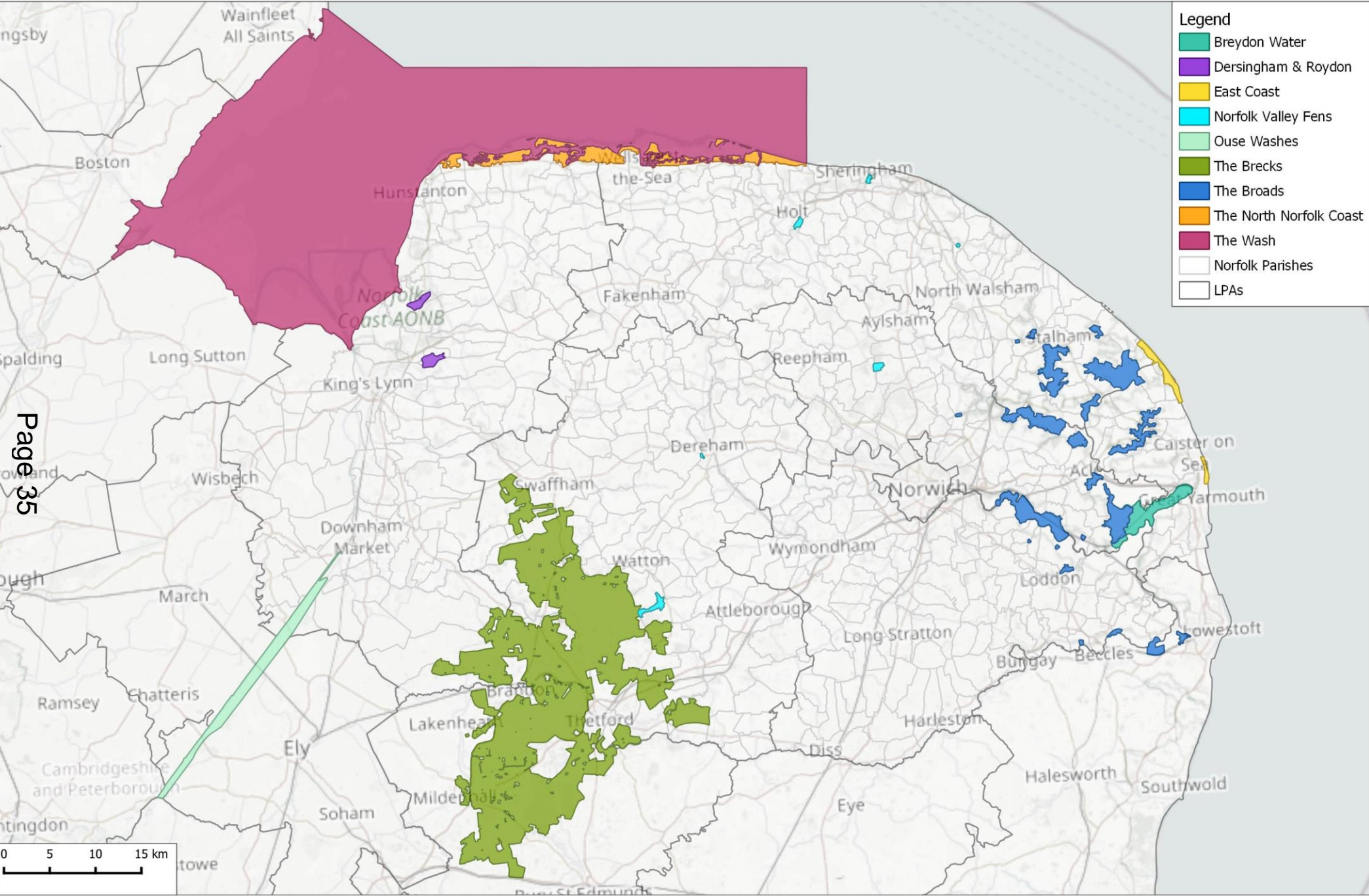
Recreation use

- 1.10 The relevant European sites have varying levels of public access, ranging from a simple network of public footpaths to nationally-promoted sites with visitor centres, cafes, etc. Some sites are open access land, for example granted under the CROW Act (2000). Some sites have extensive tourist infrastructure. In the Broads and along the North Norfolk Coast much access occurs on water (via boating and watersports) as well as by land.
- 1.11 Concern about recreation impacts to many of the European sites extends back over many years (Mahon, 1994; Norfolk Coast Project, 1995; Liley, 2008; Skeate and Perrow, 2008). Visitor surveys of most of the sites were conducted in 2015/16 by Footprint Ecology (Panter, Liley and Lowen, 2017), and that work included predictions of how access might change as a result of plan-led housing growth. That visitor survey was commissioned to provide necessary evidence for Habitats Regulations Assessments of Local Plans.
- 1.12 Table 1 highlights relevant types of recreation impacts are relevant for each site, with respect to the following impact pathways:
- **Damage:** encompassing trampling and vegetation wear, soil compaction and erosion;
 - **Contamination:** including nutrient enrichment (e.g. dog fouling), litter, invasive species;
 - **Disturbance:** relevant to fauna only, and relating to the avoidance of otherwise suitable habitat, direct flushing and direct mortality (e.g. dogs killing wildlife, eggs being trodden on, nests deserted);
 - **Fire:** increased incidence and risk of fire, and;

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

- **Other:** all other impacts, including harvesting and activities associated with site management, for example the difficulties in achieving necessary grazing.

Map 1: Relevant areas.



Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Table 1: Summary of key sites where mitigation required and some of the potential general impacts from recreation to the European Site interest features. Potential zone of influence reflects the 75th percentile (visitors from home only) from the 2015/16 visitor survey. Grey shading (Ouse Washes) reflects the site with some uncertainty.

Area	European Sites or component sites	Disturbance to breeding birds	Disturbance to wintering/passage birds	Disturbance to non-avian interest	Damage (Trampling/erosion)	Increased fire risk	Contamination	Other	Notes
Breydon Water	Breydon Water SPA/Ramsar	✓	✓						Key concerns relate to eastern end of site, which is accessible from the edge of Great Yarmouth.
Dersingham & Roydon	Roydon Common & Dersingham Bog SAC, Dersingham Bog Ramsar, Roydon Common Ramsar	✓ ¹	✓ ¹		✓	✓	✓	✓	SAC comprises both Ramsar sites
East Coast	Winterton Horsey Dunes SAC Great Yarmouth North Denes SPA	✓	✓		✓	✓	✓	✓	Little Terns (SPA feature) mobile and breeding sites vary over time
Norfolk Valley Fens	Norfolk Valley Fens SAC (Buxton Common SSSI, Holt Lowes SSSI, Potter and Scarning Fens SSSI, Sheringham and Beeston Regis Commons SSSI, Southrepps Common SSSI and Thompson Water, Carr and Common SSSI).				✓	✓	✓	✓	Only some of the component SSSIs vulnerable as not all have access or vulnerable features
North Norfolk Coast	The North Norfolk Coast SAC/SPA/Ramsar	✓	✓	✓	✓		✓	✓	
Ouse Washes	Ouse Washes SPA/Ramsar	✓	✓						
The Brecks	Breckland SAC/SPA	✓			✓	✓	✓	✓	
The Broads	The Broads SAC, Broadland SPA/Ramsar	✓	✓		✓	✓	✓		
Wash	The Wash and North Norfolk Coast SAC, The Wash SPA/Ramsar	✓	✓	✓	✓		✓	✓	Wash and North Norfolk Coast SAC extends a long way east and some overlap with North Norfolk Coast

¹ Note that while Roydon Common & Dersingham Bog are not designated as SPAs, both have supported notable numbers of nightjars in recent year and Hen Harriers have roosted at Roydon.

Existing mitigation and the benefits of a strategic approach

- 1.13 A strategic approach to mitigation was set out in the Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy ('GIRAMS') (Hooton and Mills, 2020). This covered all Norfolk European sites and built on the visitor survey results (Panter, Liley and Lowen, 2017) to establish mitigation approaches. The latter included green infrastructure (to draw visitor use away from European sites) and access management measures on the European sites themselves.
- 1.14 A strategic and plan-led approach to protecting European sites from the impact of recreation is now widely recognised as being more effective than dealing with these impacts on a development-by-development basis. Similar approaches have been established around the country (for example on the Dorset Heaths, the Thames Basin Heaths, the Solent, the Suffolk Coast, within Poole Harbour, the South Pennine Moors, and on the Northumbria Coast).
- 1.15 Recreation pressure is complex, as the way visitors use a site can change with time, and the distribution of a European site's qualifying features can also change. Furthermore, to ensure effectiveness, mitigation needs to include a package of measures that work together in an integrated way. For example, educating visitors, reinforcing messages with site-based staff, and providing the right infrastructure to meet visitor needs and influence visitor behaviour could all fit together as part of a mitigation package, but are the kinds of measures that cannot be delivered in a piecemeal way, implemented by individual developments. The situation in Norfolk is particularly complex, given the range of European sites and the different organisations involved in looking after them. It is only through partnership and collaboration that mitigation will work, and this cannot be achieved piecemeal.
- 1.16 Collective funding is therefore essential for measures on and around the European sites, and these fit alongside the provision of alternative green infrastructure in the right places, and with the right facilities to make a meaningful reduction in visits to the European sites.
- 1.17 A strategic approach also ensures that mitigation can be secured in a way to maximise benefits for local communities and wildlife, ensuring a positive

approach that provides for recreation use, and ensures long-term protection for the European sites.

Aims of this plan

- 1.18 The current GIRAMS strategy has now been in place since 2020. Since then, the Covid pandemic has changed how people visit the countryside and use local greenspaces, and also highlighted the importance of local greenspace. There is therefore a need to revisit the GIRAMS and ensure the right measures are in place.
- 1.19 There is also new evidence and emerging studies that provide new context. A study of the North Norfolk Coast and the Wash (Liley *et al.*, 2022) identified a new direction for visitor management and highlighted the need to reduce visitor numbers in a strategic way. An on-going piece of work for West Suffolk is producing a mitigation strategy that will involve some Norfolk sites.
- 1.20 Local authorities are at varying stages in their local plans and the potential housing numbers in the emerging plans does not necessarily reflect the growth envisaged when the GIRAMS was produced. There is therefore a clear need to review and refine the existing mitigation approach, so that relevant local authorities, as competent authorities under the Habitats Regulations, are able to rule out adverse effects on integrity (from increased recreation pressure associated with new housing growth), alone or in combination for plan-led growth.
- 1.21 As such this report builds on the original GIRAMS study to set out detailed actions relating to mitigation measures on European sites. It sets the basis for partnership working and the relevant organisations to work collectively.
- 1.22 Mitigation will also need to include measures away from the European sites/SSSIs. These largely comprise measures that relate to providing alternative recreation provision, typically referred to as Suitable Alternative Natural Greenspace (SANG) and these are part of the overall GIRAMS approach but are outside the scope of this report.

2. Scale of growth to be mitigated and zones of influence

- 2.1 The Norfolk Local Planning Authorities provided data on potential housing that they anticipated likely to come forward 2022-2041 and that will potentially require mitigation. These data indicate a total of around 47,448 dwellings (Table 2). This is clearly an approximate figure and represents a snapshot in time and a best estimate as to likely scale of mitigation required. The data are summarised according to different areas/European sites and mapped in the separate Annex. Using these data we have extrapolated the figures to give an indication of the level of growth over the period to 2046. This gives a total of 74,950 dwellings.

Table 2: Approximate breakdown of housing growth by local authority (data provided by Norfolk Local Planning Authorities) to 2046.

Local planning authority	Estimated growth to 2046 (25 years)
Breckland	14,292
South Norfolk	12,315
Broadland	10,599
North Norfolk	9,813
Norwich	11,435
King's Lynn and West Norfolk	10,369
Great Yarmouth	5,793
The Broads	334
Total	74,950

- 2.2 Postcode data from early 2023 indicate there were around 439,278 residential dwellings within Norfolk, growth to 2046 (74,950) would represent an increase of around 18%.
- 2.3 New housing will come forward at a range of locations across Norfolk. Housing in different locations will have different implications for European sites. In general, the closer development is to sites, the greater the likely level of increased recreation use. For example, new residents in Great Yarmouth might be more likely to visit Winterton Dunes than Holme Dunes. The pattern is however complex, given the range of different sites, different draw for recreation use, how people use sites for recreation and the transport links.

- 2.4 Use of the 75th percentile from postcode data has become a standard way to define a geographic area, a zone of influence, within which likely significant effects might be triggered, thereby triggering a requirement for mitigation (see Liley, Panter and Chapman, 2021 for discussion). The use of the 75th percentile (i.e. closest 75% of interviewees) ensures that the zone captures the majority of use and captures the local use (which is typically the most regular). The zone is sometimes adjusted to reflect particular types of user or local geography, depending on the relevant issues.
- 2.5 Table 3 summarises the zones of influence for each of the relevant areas included in this Action Plan. These figures are drawn from visitor survey data and the 75th percentiles for those interviewees visiting on a short visit directly from home that day. The 75th percentiles broadly reflect those values used in the GIRAMS, with some slight differences that reflect that the GIRAMS included Breydon Water in the East Coast and also took the average 75th percentile rather use than the pooled data. The zones are mapped in Maps 2 - 5, which also show the postcode data (compiled by Parish). The maps further differ from the GIRAMS in that only those component parts of the Norfolk Valley Fens where access impacts are relevant are included.

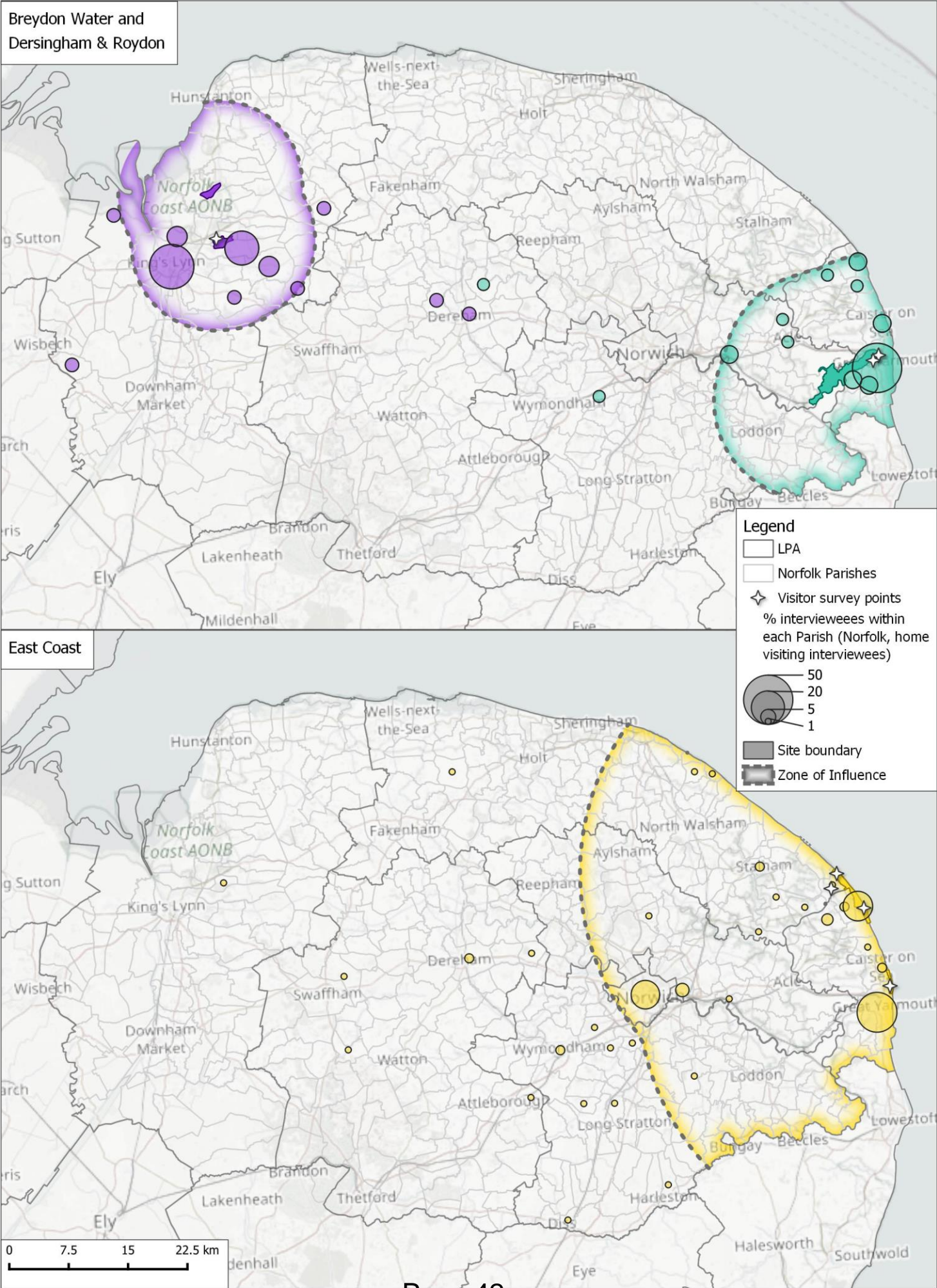
Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Table 3: Potential zones of influence and current housing figures (extracted from postcode data from early 2023); No visitor data are available for the Ouse Washes so there is uncertainty around the scale of any zone of influence.

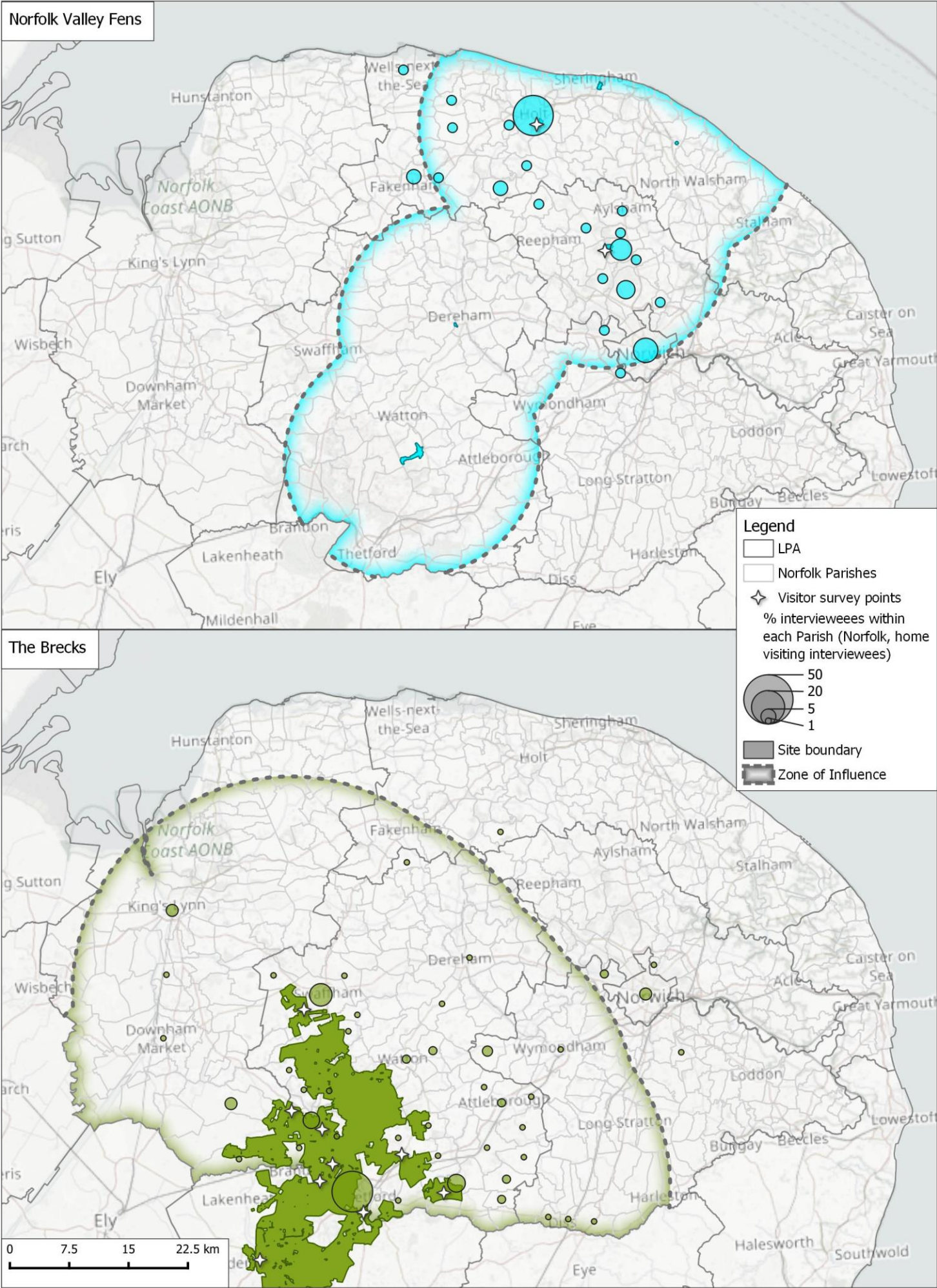
Area	Potential zone of influence (km)	Current housing within zone of influence within Norfolk
Breydon Water	12.1	61,681
Dersingham & Roydon	10.4	38,777
East Coast	31.8	221,206
Norfolk Valley Fens	14.7	210,094
North Norfolk Coast	40.6	284,544
Ouse Washes	?	
The Brecks	26.3	170,639
The Broads	29.7	306,499
Wash	58.4/ 11.0*	229,655

*The two distances reflect the east coast (58.4km) and the south coast (11.0km) where access patterns and draw are very different. See separate Annex for details and background.

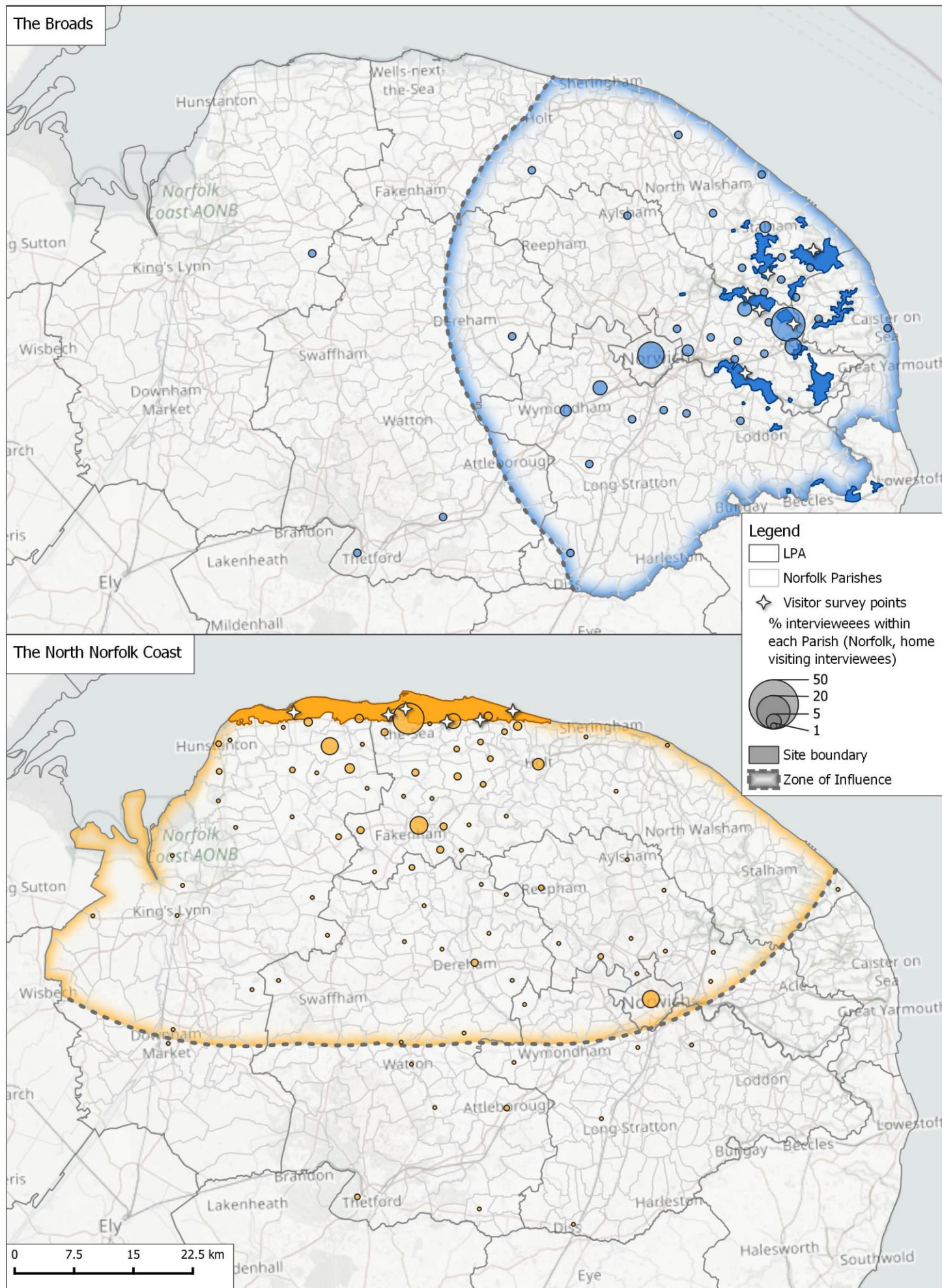
Map 2: Zones of Influence at Breydon Water, Dersingham & Roydon and the East Coast.



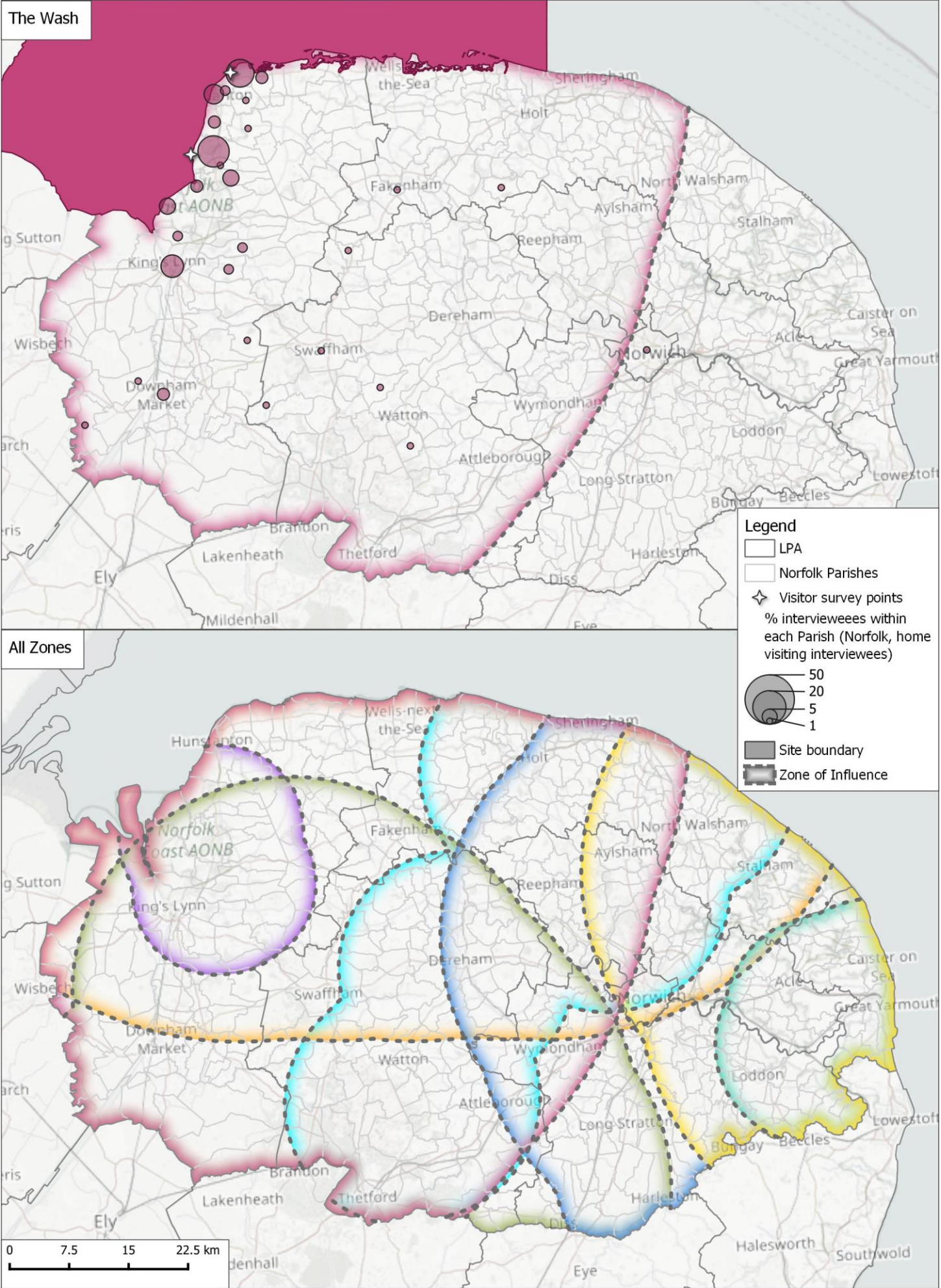
Map 3: Zones of Influence at Norfolk Valley Fens and The Brecks.



Map 4: Zones of Influence at The Broads and The North Norfolk Coast.



Map 5: Zones of Influence at The Wash and for all areas combined.



Application of zones

- 2.6 As Map 5 shows there are potentially areas where 5 zones overlap, much of the County falls within 3 zones and no areas are outside any zone. Given the complexity and scale of the zones, as shown in Maps 2-5, a tariff approach that is directly linked to which zones a given development falls into is too challenging to implement and would lead to some small areas where there are multiple zones that overlap (in the centre of Norfolk) paying a much higher contribution than others. This would potentially be disproportionate and unfair as the areas where many zones overlap are typically set some distance back from those sites, and therefore it is perhaps to be expected that recreational use will be relatively infrequent to particular destinations and thinly spread. For example, residents in new development in Norwich might be expected to make occasional visits to the East Coast, the North Coast, the Broads, the Brecks or the Wash, while new residents in Wells might well make the same overall number of visits, but largely focussed on the North Norfolk Coast.
- 2.7 Another challenge with the zones relates to the geography of Norfolk and the shape of the coastline in particular. The large draw for the eastern side of the Wash is largely a result of visitors coming from outside Norfolk and from the west (see Map 6 in Panter, Liley and Lowen, 2017). While we have drawn the zones in terms of a set radius around the European sites, it does appear that there are relatively few people visiting Snettisham, Heacham etc from east Norfolk and many of the further postcodes are actually towards the centre of the Country (from locations such as Peterborough), potentially reflecting a pattern of use where people are visiting their nearest coastline.
- 2.8 The GIRAMs advocates a single, county-wide zone of influence and set tariff. That approach is now established and is also assumed for this Plan. There is a risk with this approach, however, that developer contributions are not then linked spatially to where the impacts occur, and for example developer contributions from King's Lynn might end up being used to fund mitigation measures at Breydon Water. These risks can be reduced by regular checks of the level of housing growth within different zones of influence (as shown in Maps 2 - 5), and mitigation delivery being targeted accordingly. This will require careful oversight. Risks will be further reduced if mitigation measures are (as far as possible) relatively widespread or evenly distributed and mitigation costs for different areas are relatively proportionate to the level of growth likely to come forward.

3. Mitigation measures

- 3.1 Mitigation comprises a suite of access management and monitoring projects for each of the areas covered in this Plan.
- 3.2 A suite of mitigation measures should function together to provide confidence that impacts arising from recreation have been prevented. A combination of measures working together reduces risk and builds in contingency if some measures do not perform as well as envisaged or there is a time lag associated with the effectiveness (e.g. measures that are designed to change behaviour may take time to become accepted). Other measures can still be functioning in the short term whilst others are revised or become more effective.
- 3.3 The aim of the mitigation is to allow a conclusion of no adverse effects on integrity to any of the relevant European sites from recreation, as a result of the relevant authorities' Local Plans, alone or in-combination with other plans or projects.

Identification of measures

- 3.4 Many of the European sites are looked after by a range of organisations. Mitigation measures need to integrate with the current management and aspirations of those organisations. It is important that any mitigation is both robust and deliverable by organisations on the ground. In order to identify the capacity and scope for suitable measures that could be rolled out following confirmation of funding, Footprint Ecology circulated an online questionnaire to all stakeholder organisations during August/September 2023. Stakeholders comprised all relevant Local Authorities, Natural England, Environment Agency, Forestry England, Broads Authority, Wash and North Norfolk Coast Partnership, a range of site managers/owners (including the RSPB, Norfolk Wildlife Trust, and the National Trust), boat hire organisations, and umbrella representative organisations (such as the Country Land and Business Association).
- 3.5 The questionnaire asked those contacted to identify projects that could be delivered by them, or partner organisations, to mitigate impacts of recreation arising from housing growth upon European Sites. Respondents were invited to submit as many projects as they wished, with each submission including a justification for the project and a breakdown of initial capital and rolling costs, as well as an approximate project lifetime.
- 3.6 Following receipt of the completed questionnaires, five site-specific workshops were held with stakeholder organisations between 14th and 21st September 2023. Discussion within the workshops led to the refining of some of the proposed

projects and allowed for synergy between stakeholder organisations. Subsequent one-to-one conversations were also held with a small number of key stakeholders who were unable to attend the workshops. Finally, a range of additional project ideas were generated by Footprint Ecology following further analyses of the workshop and one-to-one discussions.

Proposed measures

- 3.7 We have therefore identified a set of measures, with associated approximate costs, that provide a package of mitigation for all the sites. The combined costs attributed to this package allow us to set a suitable per dwelling tariff that can be applied across the county in order to fund the mitigation. However, it is important to note that some of the projects represent initial ideas and have an indicative budget associated with them. Some are relatively short term and small-scale while others are larger scale, complex projects. Given that mitigation will be funded by developer contributions, much of the funds will not be available for many years, by which time it may be that project costs will have changed, the design of a project may need to shift and some projects may even be less relevant as priorities change. As such, the proposed measures are indicative at this stage and may need to change with time. The measures have largely been proposed by relevant organisations or suggested in the workshops and therefore there is reasonable confidence that they can be delivered.
- 3.8 A summary of the proposed project ideas, including the European Site to which they are relevant and a justification for their proposal, is provided in Table 4. Costs for measures are summarised in Appendix 1. The codes provided in the first column of Table 4 allow direct cross-reference with the same projects detailed in Appendix 1.
- 3.9 It should be noted that there are no projects that have been specifically identified for Roydon and Dersingham or Breydon Water and relatively few projects relating to the Valley Fens. However, mitigation for housing growth at these sites will be addressed through the suite of projects that cover all sites and there is scope for further projects to be added over time.

Table 4: Summary of mitigation measures. The implementation column uses the following codes: I - Immediate (quick wins and easy to implement), M - Medium term (projects that may require further build-up of funds or longer lead in time) and L Longer term (projects requiring long lead in time, preparation or where there are further checks or steps needed). Projects are categorised according to the following types: A Small/temporary infrastructure, B Significant infrastructure project with long term benefit, C Direct on-site engagement, D SANG type project, deflecting visitors away from European site (but linked to European site rather than totally discrete), E Off-site engagement, F Monitoring, G Review or investigative projects to determine further details around mitigation delivery, H Support for organisations delivering mitigation and collaboration. Blue shading indicates projects that are initial priorities for delivery.

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
All sites								
A1	County-wide dog project	Staffed project with membership, with targeted work around dog ownership and walking in the local countryside, with pop-up events, posters for vets, and some training events.	Range of organisations	Dogs are key issue and need to influence people's behaviour. This provides a positive and proactive means to do so. Delivered strategically and cross Norfolk basis so mitigation benefit to all sites		I	E	Other projects such as Dorset Dogs, Devon Loves Dogs and work by Bird Aware Solent provide useful context and case studies.
A2	Gazetteer of dog walking sites	Online resource highlighting locations to walk dogs and expected behaviour	Range of organisations	Positive measure to promote robust sites and highlight ones with particular issues.		I	E	Dynamic and easily updated resource that allows site managers/owners to provide specific instructions and guidance.
A3	Visitor monitoring at relevant sites	Visitor surveys to identify how people are using sites, routes taken, and awareness of nature conservation issues. Potentially involving counts (e.g. of vehicles) as well as interviews	Range of organisations	Monitoring picks up trends and changes at sites and informs future management/mitigation.		I	F	

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
A4	Online hub for reporting problem behaviour by light aircraft	Creation and promotion of an online hub for the public/site managers to log problem behaviour by light aircraft, with data monitored by Delivery Manager and used to directly approach relevant flying clubs, airfields etc if and when problems emerge	Range of organisations to be involved; uncertainty around how and where to host	Disturbance impacts to qualifying bird species/assemblages from light aircraft identified for the East Coast, Breydon Water, and The Broads, but also has potential to impact North Norfolk Coast and the Ouse Washes.		M	F	Aim to achieve a simple system that can document any incidents and allow them to be followed up.
A5	County-wide car park review (capacity, charging, economy, coastal change, etc)	Full review of car parks within/adjacent to European sites, to identify scope for changes in management, charging, implications of coastal change, etc. Focus on coastal strip from King's Lynn to Great Yarmouth, including parts of the Valley Fens and the Broads and Dersingham/Roydon. Aim to highlight where changes could influence visitor use.	Range of organisations	Car parks provide the first point of access to most of the European Sites under consideration, and their capacity/charges may impact their level of use and subsequent access.		M	G	

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
A6	Norfolk focused events for stakeholders	Networking/knowledge sharing events which will allow case studies/best practice/lessons learned to be shared between stakeholders and/or land managers. Potential for events to be annual and could be run as a mini conference, with scope to call for future projects	Range of organisations	Events will allow evidence-based mitigation to be shared between site managers/organisations, critically providing opportunities to ensure consistency across organisations (e.g. in signage and messaging), allow issues to be picked up and tackled strategically and ensure best practice is rapidly adopted.		I	H	
A7	Site ambassador (volunteer) network and engagement training	Identification, training, and support of local ambassadors via in-person events, alongside coaching for both Ambassadors and site staff in how to engage with the public.	Range of organisations	Investment in local people and engendering a sense of ownership will benefit interactions with other local site users, potentially of increased value at smaller sites (e.g. component units of the Norfolk Valley Fens). Training could cover how to approach people on reserves, messages for particular audiences (such as dog walkers) and health & safety issues. Events could allow networking, ensure consistency across sites etc.		M	H	

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
A8	AONB comms position (covering whole coast)	Post to produce engagement material and projects to promote the coast as a single protected landscape (rather than component sites) with certain behaviours expected of those using it. Project to explore ways to influence people before they leave home through social media, web etc.	Norfolk Coast Partnership	Promotion of the entire Norfolk coast a single protected site will lead to similar behaviour across site boundaries.		M	E	Role work potentially to cover from King's Lynn to Great Yarmouth and include some inland areas
A10	Delivery Manager	Post to oversee infrastructure works, budget oversight, ensuring mitigation spatially relevant to housing growth	Norfolk Trails, Norfolk County Council	Post necessary to drive works forward and manage budget	Project manager post necessary over strategy period to ensure projects are delivered and support partnership working	I	H	
A9	Fire consultancy support	Budget to cover review of fire management plans and vulnerability of sites and potentially extending to training and joint working to ensure all prepared	Range of organisations	Ensures joined up approaches to fire risk and provides confidence that suitable measures in place		I	H	Rolling across multiple years with scope for different reserves, site teams etc to draw on external help and advice. Focus should be bringing organisations together and Brecks probably highest priority with also need to include reedbeds, woodland and range of other areas/habitats

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
A11	Monitoring strategy	Monitoring strategy to set out how ecological and recreation monitoring will fit together to inform case studies, improve effectiveness and inform mitigation delivery	NCC	Strategy will be necessary to ensure ecological and visitor data can be combined effectively and the data available to ensure mitigation targeted and effective. Outputs from monitoring likely to be used by a range of parties		I	F	
A11	Project specific monitoring	Flexible budget targeting selected example projects, allowing data to be collected on visitor impacts, ecological responses and mitigation effectiveness. Results used to inform future mitigation delivery and best practice.	NCC	A selection of projects should have detailed monitoring established to show how they have changed behaviour, reduced impacts etc. These can provide case study material to help inform future delivery, selection of future projects and share best practice	Dependent on monitoring strategy	M	F	Monitoring strategy would inform how money spent and delivery manager would be able to target the resource as needed. Money spread over a number of years
Breydon Water								
BW2	Project to assess frequency/impact of waterskiing in Breydon Water SPA	Project will gather evidence which will inform potential future regulation of waterskiing within the SPA and inform design of mitigation.	Broads Authority	Will reduce disturbance to the SPA through greater clarity of issues and how best to address		I	F	Follow-up measures to address outcomes from study will need to be secured as appropriate
East Coast								

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
EC1	East Norfolk beach-nesting birds: Team Leader	Permanent, year-round, role to oversee planning and delivery of the protection of Little Terns associated with the Great Yarmouth North Denes SPA.	RSPB	This role manages the staff delivering the protection work on the ground, overseeing effective resource deployment to protect Little Terns associated with the Great Yarmouth North Denes SPA. The Team Leader role is permanent, year-round and enables key relationships to be developed that builds trust. This is essential for successful delivery of the project.	Existing post that can be carried forward. This role will need to be ongoing given the nature of disturbance impacts on the coast and complexities of the logistics of the tern protection but may be able to support work on other stretches of the coast as the east Norfolk work develops.	I	C	The RSPB has been managing the little tern colonies within the Great Yarmouth North Denes SPA since 1986. They have been developing the project to create more opportunities for volunteers to get involved and continue to work closely with communities. The Team Leader retains oversight on the work, deploying the team resource where it is most needed and being able to respond to issues through the season without impacting the management undertaken by the wider team.

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
EC2	East Norfolk beach-nesting birds: Community & Volunteer Officer	Role will oversee the development of a volunteer team, and provide community support and an event programme to support the development of suitable behaviours around beach-nesting birds, notably protection of Little Terns associated with Great Yarmouth North Denes SPA.	RSPB	Management of the little tern colonies in east Norfolk requires a significant volunteer team to work alongside the wardens. This ensures that the staff time can be focussed on hours that are harder to find volunteer support (e.g. night shifts). The volunteers also enable the project to increase its behaviour change influence through attending events and supporting the communications programme developed by the CVO.	Individual already in place. Permanent, year-round role to maintain relationships and ensure volunteers are kept engagement outside the breeding season to avoid having to start afresh each season.	I	C	The RSPB has been managing the little tern colonies within the Great Yarmouth North Denes SPA since 1986. The role is essential for successful delivery of the project. The Community & Volunteer Officer manages all the volunteer support needs and work in the community. We have trialled this role in 2023 and since May have had 52 volunteers supporting the work, with c.1800 hours of time given to the work.
EC3	East Norfolk beach-nesting birds: Senior Beach Warden	Annual post running from March to end of September to support preparations for setting up Little Tern fencing, signage, and associated infrastructure, support inductions for Beach Wardens and volunteers, help manage colony takedown, and support end of season reporting.	RSPB	This role is needed to provide expertise and support to the Team Leader on effective management of protection fencing, monitoring work and ensure staff welfare needs are met. The early start of the role is essential to ensure they are suitably inducted and equipped to support the Team Leader through the season.	This role has been tested in 2023 and was highly effective in supporting and directing the wardens.	I	C	The Senior Beach Warden role is for March to the end of September and provides support to the Team Leader and Community & Volunteer Officer through the breeding season. They oversee the day-to-day work of the Beach Wardens and ensure the team has the right resources.

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
EC4	East Norfolk beach-nesting birds: Beach Wardens	Beach wardens to engage with beach users and limit disturbance to Little Tern colonies.	RSPB	Support management and monitoring of little tern colonies with the Great Yarmouth North Denes SPA. Set up colony infrastructure and takedown at the end of the season. Engage with beach users to encourage suitable behaviours around the colonies. Cover night shifts to ensure 24/7 protection from egg thieves and groups using the beaches at night. Employed from April through to September.	The Beach Wardens will be continually needed, especially to support 24/7 wardening of the colonies. The recruitment process is already established and will take place annually.	I	C	The Beach Warden roles are essential to engage beach users and develop effective behaviour changes around beach nesting birds. They reinforce the messaging around signage and ensure that fencing is maintained. 24/7 wardening is needed on beaches as egg thefts continue to occur, as well as vandalism.

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
EC5 Page 57	East Norfolk beach-nesting birds: Fencing	Fencing to protect up to three Little Tern colonies in East Norfolk: including Eccles, Winterton and Great Yarmouth North Denes.	RSPB	A three-tier fencing structure is set up around little tern colonies. These also provide additional protection to ringed plovers. Poultry netting provides a barrier for hedgehogs and small ground predators. 7-strands of electric wires surround the outside of the poultry netting to provide protection from larger ground predators such as foxes, deer and dogs that could push through the fence. A rope cordon is also positioned around the main fence to keep beach users away from the core colony area and additional areas of importance for chicks using adjacent vegetation.	Fencing would last 2-3 years, but would then need to be replaced to ensure it remains effective each year. This is especially important for the steel wire that corrodes and becomes encrusted with salt which impacts its ability to carry a charge.	I	A	Fencing little tern colonies is essential to provide protection from ground predators and to keep beach users at a suitable distance from the colony. Wardens are needed to ensure the fence is maintained and remains effective (e.g. ensure protection from tides, replace after vandalism, addressing any short circuiting limiting the effectiveness of electric wires (e.g. through salt accretion or touching on marram grass)).

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
EC	East Norfolk beach-nesting birds: Signage	Provision of fixed and mobile information and warning signs along East Coast beaches/in proximity to Little Tern colonies.	RSPB	Fixed signs will be used to provide key information about the beach area and inform visitors how they can share the beach in a way that will not disturb the little terns and other beach nesting birds. A-frames will be used to provide information to beach users that can be moved up and down the beach with the tide. Smaller signs will be used to direct beach users around the colony and also provide warning of the electric fencing.	It is expected that smaller signage and the A-frames would need to be replaced within five years due to wear and tear and the need to keep messaging relevant. Larger panels may last for longer subject to information remaining relevant.	I	A	Signage is a tool that works in conjunction with fencing and wardening to inform beach users of the importance of the area for little terns and provides advice on how to use the beach area in a way that meets their needs as well as protecting the little terns and other beach-nesting species from disturbance. Signage on its own is not an effective protection measure, as it is often ignored and removed if wardening is not included as part of a wider package of measures to address recreational pressures on coastal sites.

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
EC7	East Norfolk beach-nesting birds: welfare facilities for staff and volunteers	Shelter and toilets for staff and volunteers wardening East Norfolk Little Terns.	RSPB	Basic welfare facilities are required for staff and volunteers protecting the little tern colonies from disturbance. This will require a portacabin at Winterton and portaloos at Eccles and Winterton annually.	The RSPB already has the contacts to bring in a portacabin and portaloos. This includes the means to get them to the beach and off again. This would be required annually for the duration of the Local Plan period and beyond.	I	C	The Welfare facilities are an essential requirement to ensure that the health and safety needs of the project are addressed. The portacabin also provides a secure place to store equipment close to the colony for maintenance purposes.
EC8	Vegetation monitoring at Winterton Dunes NNR	Habitat & vegetation communities mapping, including work to determine quality/species assemblage along pathways/desire lines to identify any change in level of trampling/enrichment impacts.	NE	Will provide feedback loop to inform, target and hone mitigation measures	Surveys repeated at 5 year intervals	I	F	Potential to include use of drones and to supplement condition assessments

Norfolk Valley Fens

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
NVF1	Buxton Heath car park upgrade and signage/waymarking	Formalising of parking spaces within car park and removal of informal parking options, alongside provision of improved signage and waymarked trails around perimeter of site.	Norfolk Wildlife Trust	The site is close to Norwich and therefore likely to attract a larger amount of visitor pressure than other Valley Fen sites. Scope to make sure parking robust for long term and fixed amount of parking a means to limit large numbers of visitors. There are currently no waymarked trails around the site, and promotion of the perimeter path would minimise the number of visitors accessing potentially less disturbed/accessible central areas of the site.		M	B	Any works to perimeter path needs to be carefully undertaken to ensure no impact to SAC. Project a suggestion from workshops and would require Wildlife Trust and Natural England to develop further
NVF2	Improvements to car park, path resurfacing and installation of sculpture trail at Holt Country Park	Improvements to existing car park surfacing to promote parking there, and creation of sculpture trail with aim of diverting people within the Country Park (and away from neighbouring Holt Lowes).	NNDC	Will reduce off-site parking adjacent to Holt Lowes and decrease the number of visitors accessing Holt Lowes through the Country Park by focussing visitors in the country park.		M	B	
NVF3	Provision of dog bins	Provision of single dog bins at smaller component sites within SAC and funding for collection (costed at 3 bins/sites currently).	Relevant local authorities	Will reduce incidence of dog fouling/contamination along circular walks within smaller component sites.		I	A	

North Norfolk Coast

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
NNC2	Seasonal dog restrictions	Employment of seasonal beach wardens, alongside interpretation panels, cordoning of sensitive areas with ropes and chestnut paling, and numerous social media accounts.	Holkham Estate	Recognised decline of various shore birds and the impacts dog disturbance has on them during the breeding season.		I	C	
Page 61 NNC3	QR codes for information panels on public footpaths	Installation of small-scale info posts/panels along footpaths crossing farmland or managed woodland/marshland/etc, with a series of QR codes explaining what farming practices can be seen, what environmental/conservation measures are in place, and information about the history, geography and geology of the site.	North Norfolk Coastal Group and River Mun Catchment Group	The information panels would give the wider community insight into the work of the land managers - both farmers and conservationists. This would serve both as an educational tool but also a means of lessening the gap in understanding between the public and the people farming or managing the land. It would also help to explain why some land is fenced off, why dogs must be on leads at certain points. It could be utilised in other ways - directing people on walks, giving information about services (cafes/toilets) nearby. They would serve as a conduit of information for people using the area for recreational purposes.	The process would be relatively quick to set up, then the updates to information would take place regularly and would be the responsibility of the land manger corresponding to each QR code info point.	I	A	

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
NNC5	Interpretation panels at Branodunum Roman Fort	Provide 6x interpretation panels at Branodunum Roman Fort, adjacent to the designated site.	National Trust	Panels will explain the importance of the area and educate visitors, whilst promoting dog walking/walking space off the linear route next to the designated site.	Timing could be linked with new National Trust boardwalk	I	D	Some National Trust funds would be available and hope to seek other external funding
NNC6	Signage audit and installation of interactive interpretation points	Audit of signage on Coast Path, aligning messaging and rolling out interactive signage with improved accessibility (including opportunities for Fixed Point Photography monitoring).	Norfolk Trails, NCC	Inform users of the path of the special qualities of the environment they are walking through, but in an immersive, interactive way.	Phased approach. Initially trialling along stretch 4 of ECP then roll out on annual basis.	I	A	This project is scaleable. Priority sites/sensitivities can be identified and then interpretation rolled out accordingly and according to funds available / time scales available.
NNC7	Path surface improvements & bridge provision on Stiffkey Saltmarsh	Surface upgrades to two Rights of Way paths & installation of bridge on Stiffkey saltmarsh.	National Trust	Prevent further trampling of coastal saltmarsh paths & allow eroded areas to recover by addressing desire lines and keeping people on linear routes	Linked to dedication of public right of way to north of former bridge location	M	B	Some National Trust funds would be available and hope to seek other external funding

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
NNC8	Accessible path at Morston Quay	Creation of new path connecting buildings and circular boardwalk to enable people with additional needs to experience the marsh without resultant trampling impacts.	National Trust	There is an existing desire route being used by visitors. This project would provide formalised but focussed route, to reduce trampling of marsh (e.g., footpath braiding) yet provide a good visitor experience. There studies from other parts of the country that show path improvements work to focus use, reduce spread of footfall and reduce recreation impacts	Would need to be installed at least sensitive times (e.g., between breeding bird and wintering periods)	M	B	Some National Trust funds would be available and they hope to seek other external funding. Mitigation benefit would depend on the route, design and how much tourist focus the path may have
NNC9	Interpretation materials for visitors at Morston Quay	New build room on existing toilet block to provide visitor welcome with interpretation about wildlife value and need to help protect area and impact coastal change.	National Trust	Explain importance of area and educate visitors	New build in 2024	I	A	Some National Trust funds would be available and hope to seek other external funding
NNC10	Review of dog restrictions around Blakeney Harbour and Freshes and implement findings	Consultant review of existing management measures (e.g. dog restrictions, signage), identification of current impacts of dog disturbance, and provision of recommendations for improved management.	National Trust	Dogs are believed to be having a significant impact, particularly on nesting and wintering birds. Bird population would benefit from reduced disturbance		I	G	Would form part of wider measures to mitigate visitor disturbance on the North Norfolk Coast

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
NNC1 1	Seasonal wardening around Blakeney, Blakeney Point, Stiffkey, and Brancaster	Seasonal staffing (rangers/wardens) to help manage disturbance issues (e.g. enforce dog restrictions, share wildlife messaging, litter picking, etc).	National Trust	Evidence shows direct intervention is the most effective means of managing visitor disturbance. Increased visitor pressure means greater staff presence required. Seasonal staffing suggested as coast is much busier in spring and summer		I	C	

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Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
NNC13	Establish "Gateway to Blakeney Point"	Visitor welcome hut to be positioned at Cley Beach end of shingle ridge. Hut will provide a base out of which seasonal rangers/volunteers can operate to welcome visitors to Blakeney Point, explain the importance of the site, and set expectations about standards of behaviour (including zonation of access - restriction to vegetated shingle & beach/marsh). New signage to welcome visitors to Blakeney Point and make it clear that it is important for wildlife and looked after by National Trust.	National Trust	Blakeney Point is one of the top 10 most important sites for wildlife cared for by the National Trust. However, the main access point (Cley Beach car park) is run by Norfolk Wildlife Trust. Rare birds nest very close to the car park and the whole of the Point features sensitive plants and animals. Visitors need to be alerted to the fact they are on a very important and sensitive site for nature and expectations about how they should behave whilst visiting should be established early in their visitor journey. Signage is not enough - site is significant enough to justify greater staff presence and there is already a good pool of volunteers to draw on to support this work.	Signage/hut put in place before breeding season, then staff recruited ready for that breeding season.	M	C	
NNC14	Develop visitor offer at Friary Hills (SANG)	Improve attractiveness of site as alternative greenspace via an increase in picnic space capacity (including vegetation cutting and installation of picnic benches) alongside new interpretation signage and other visitor infrastructure.	National Trust	Increased visitor pressure on Friary Hills would be acceptable and unlikely to have a significant impact. This could help relieve pressure on other more sensitive sites close by.		I	D	

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
NNC1 5	Wardening and signage on Stiffkey Saltmarsh	Use of seasonal (potentially assistant) rangers/volunteers, signage, and path resurfacing to zone/seasonal restrict access and help manage visitor disturbance in the Stiffkey Marshes/Five Bridges area.	National Trust	Stiffkey Binks, to the north of Stiffkey Marshes, is an important breeding area for a number of ground-nesting species, notably common tern, little tern and potential for sandwich terns. This area should be managed to provide breeding habitat for the tern metapopulation of the North Norfolk Coast. Initial survey results indicate that removal of Stiffkey Bridge in 2022 may have contributed to improved breeding numbers, suggesting that visitor disturbance when the bridge was in place may have limited breeding numbers. Continuing to manage disturbance once the bridge is replaced could help to sustain these numbers (although this is uncertain).	Recruit staff before the March of the year we wish to	I	A	
NNC1 6	Signage and zoning of access within Young's Land (SANG)	Mow paths through long grass areas on site to improve access/recreation use within Young's Land.	National Trust	Increased visitor pressure at Youngs Land would be acceptable and unlikely to be have a significant impact at Youngs Land. This could help relieve pressure on other more sensitive sites close by.		I	D	

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
NNC18	Blakeney Point - water presence (additional capacity)	Seasonal staffing, fuel & maintenance of existing NT boat and upgrades as required.	National Trust	Seasonal staffing (rangers/ wardens) to help manage disturbance to seals from paddle boarders/ kayakers. There is also a health and safety risk to manage, as the tides/currents around Blakeney Point are quite strong/turbulent/unpredictable.	Staff need to be recruited well in advance - before the March of the year presence required on the water.	M	C	
NNC0	Further promotion of the Coastal Code	Co-ordination of online promotion and signposting across partner organisations and production dissemination of leaflets to relevant hubs (e.g. visitor centres, etc).	Norfolk Coast Partnership	Promotion of coastal code across composite sites will inform behavioural change at a strategic level.		I	E	Potentially aligns/falls within scope of AONB comms position. Code is produced and already in use, potential for wider dissemination
Ouse Washes								
OW1	Monitoring surveys for detection/spread of invasive species and watching brief on recreation use	Monitor for presence/spread of invasive aquatic/riparian plant species via recreation activities.	WWT	Establishment of invasives (e.g. Floating Pennywort) can negatively effect the integrity/functioning of aquatic ecosystems within the European site. Patterns of use may change in future		M	F	
The Brecks								

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BRE1	Enhancements to Rights of Way network	Work to make routes in more robust areas more appealing to visit (e.g. increased parking, signs, and route maps etc) and more sensitive routes more robust (e.g. planting up gaps in hedges to provide screening along linear routes).	Range of organisations	Will limit disturbance to relevant bird species where footpaths provide access through relevant habitat and by enhancing other areas potentially also deflect use		M	A	Informed by review (BRE3)
BRE2	Promotion of footpaths and walking routes	Online and printed material promoting robust/lower impact routes.	Range of organisations	Could include online promotion (e.g. gazetteer, project A2) and more local promotion through leaflets, apps, Parish Councils etc		M	E	Informed by review (BRE3)
BRE3	Review of footpaths	Review of footpaths with aim of identifying robust routes to promote and vulnerable paths to protect.	Range of organisations	Assessment of path network and site checks required to inform BRE1 and BRE2		I	G	
BRE4	Strengthening of CRoW access restrictions	Use of signage and other infrastructure to ensure that site users are always clear as to where and when access is permitted (e.g. seasonal restrictions at Cavenham Heath).	NE	Access restrictions provide fundamental protection and are established. Potential need to ensure clarity for new visitors and that the most vulnerable sites have signage etc in place and at right locations		I	A	Likely to require regular checks of existing signage
BRE5	New dog bin installation at Cavenham Heath	Installation of two new bins, plus funding for regular collection, at Cavenham Heath.	NE, WSDC	Dog bins provide a means to ensure some of the impacts from nutrient enrichment and dogs is reduced		I	A	Cavenham particularly sensitive given locations of development

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BRE6	Rabbit focus group	Support to establish group that can coordinate monitoring, research, and management of rabbit-related projects/interventions.	RSPB, NE, Forestry England, SWT and others	Rabbits are key to maintaining short sward and bare ground patches. Decline in Rabbit population as a result of disease has had marked impact. Access, particularly dogs, potentially part of the problem. Solutions likely to be complex and require some coordination. Monitoring important.		I	H	
BRE7	Signage and interpretation across the Thetford Forest Estate SSSI/SPA	Installation of multiple long-term signage/interpretation panels/info boards across the Thetford Forest Estate SSSI/SPA, promoting the importance of the forest, highlighting forest management techniques, providing forest landscape information, and historical points of interest, etc.	Forestry England	Improve visitor experiences and understanding of the landscape. Tackling on-going negative public behaviours with desire for an improvement in behaviours and more respectful recreational use. Promoting the forest as a source of well-being/green space for recreation to positively contribute to societal needs. Educate dog walkers and other recreational users on the ecological sensitivities.		I	A	

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BRE8	Rebranding & repurposing of a sensitive site (Santon Downham)	Rebranding of 'St Helens Picnic Site' to 'Santon Historical Site', including removal of existing signage and provision of paid parking ANPR (solar-powered), installation of interpretation boards detailing trails and historical sites of interest, and protective work to the riverbank to reduce erosion.	Forestry England	To reduce impacts of increasing number of visitors, damage to the riverbank and increase in dogs at the site Habitat loss and decrease in habitat quality and increased disturbance for ground nesting birds Increase in vehicles has impact on ecosystem protection. Decreases in breeding density and productivity Increase in people and vehicles has caused damage to Historic Ancient Monument - therefore need to effectively manage and educate the visitors to site sensitivity		M	B	
BRE9	Increased ranger coverage within Thetford Forest/surrounding area	Increased ranger provision promoting a face-to-face presence on site, increased scope for visitor interactions, and promotion of responsible access behaviour.	Forestry England	Face-to-face engagement provides key mechanism to influence behaviour and inspire visitors about wildlife		I	C	Able to target problem behaviours and issues (e.g. dogs on leads). Covering large area but ability to roam and target locations where issues arise.
BRE12	Interpretation panels at Cavenham Heath	Installation of 4 to 5 new interpretation panels will further inform site users about the value of the site and expected behaviours.	Natural England	Part of specific project at Cavenham to address increased recreation pressure with new signage to address specific concerns at this location		I	C	

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BREF 3 Page 71	Fenced dog exercise area at Lynford Arboretum extension	Will comprise the fencing of two (currently open) sides of an already partially fenced location and the installation of interpretation boards explaining the reason for the site's creation and expected responsible behaviour within it (minimal infrastructure with maximum gain and engagement).	Forestry England	Creates a designated dog walking/exercise location within the forest estate. Takes impacts of dog walkers away from other sites/locations and puts them into one managed area. Reduction of impacts of visitors and dogs to sensitive locations within the forest. Reducing habitat degradation and visitor/animal disturbances to habitats. Reduces dog fouling issues across the wider estate and habitats. Dog walkers have security of knowing their dog(s) are in a safe managed area. and cannot escape. The presence of dogs in this location will make deer uneasy and therefore more chance of getting natural regeneration of planting etc from reduced browsing pressure by deer. Mitigation benefit will depend on how well promoted and used this is and assumption that it would be free.	The area identified is due for felling in late 2024 so this gives a quick win in delivery	I	A	This would be a high impact - low cost project that sees really positive engagement with the public and opportunity to educate visitors.

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BRE1 4	Installation of hard (barrier) infrastructure at selected access points	Installation of infrastructure that limits certain types of vehicular access to the forest at key points.	Forestry England	Reduction of human and vehicle impacts to habitats causing disturbance, damage/degradation, anti-social behaviours and irresponsible use of the forest and it's habitats for recreation that is polluting - motorbikes for example. This is turn causes species to move/relocate from areas.		M	A	We have regular issues with vehicles in the forest causing disturbance/damage to habitats and wildlife, along with other responsible visitors using the forest for quiet enjoyment/appropriate recreation.

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BRO Page 73	Replacement of Visitor Observation Hide at Strumpshaw Fen RSPB Reserve	Replace existing, very aged, viewing structure with a new wood build (including foundations sunk within peat soils).	RSPB	The fen hide at Strumpshaw is extremely well used being the nearest location to the reception area, which oversees the fen. Strumpshaw Fen is one of the most important locations for visitors to see wildlife and understand the importance of the work RSPB does in the Broads alongside other conservation organisations. Provision of interpretation (live and static) enables RSPB messages and other Broads messages to be conveyed describing the threats to nature from pollution, climate change, sea level rise, invasive species, poor use of the water resource. Alongside the threats, solutions to these issue can be conveyed to hopefully bring about behaviour change and encourage sustainable use of natural resources.	Demolition and construction would best be undertaken outside of the breeding season e.g. March through to end July and preferably before winter. So ideally August - October.	M	B	Hide has particular engagement and education role. Mitigation benefit may require further clarification before funding.

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BRO Page 74	Resurfacing of overflow car park at Strumpshaw Fen RSPB Reserve	Improvements to the surface of the car park will create an all-weather facility able to cope with increased visitor numbers.	RSPB	Strumpshaw Fen is more robust site where access can be promoted to the Broads and the infrastructure is such (and already in place) that impacts can be absorbed. The overflow car park is essentially a meadow with open weave matting installed as a surface layer to spread load and improve traction. This solution is not sustainable and regular lifting of the matting is needed to retain the benefits. By installing a more resilient and permanent solution e.g. linked open cell matt structure with aggregate and permeable membrane a more effective surface would be maintained year round. On most days the overflow car park is used and on busy days is full to capacity. Increased visitor vehicle use requires a more robust surface for this premier site.	Ideally installation would best be completed when conditions are drier and before or after the main visitor season - so March or October. However, due to climate change a more flexible approach may be needed to make the most of in-year weather conditions.	M	B	Will need specific contractor and external project manager. Further checks may be necessary to clarify mitigation benefit prior to funding awarded.

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BROG Page 75	Upgrade of visitor trails at Strumpshaw Fen RSPB Reserve	Installation of an all-weather surface along approx. 1.5km of trail to enhance access.	RSPB	Strumpshaw a more robust location and the concentration of visitor facilities ensures recreation impacts managed and contained. The trails are currently a soil and turf design with extremely short sections of planking to bridge the worst boggy areas. The whole fen trail is low lying and surrounds the wetland with on edge running parallel with and directly adjacent to the River Yare. Flooding is occasional and in winter sections of the trail become impassable. In order to maintain a safe, all-year round surface to allow existing and new visitors to access the site to see wildlife the section of trail running along the Witton Run and sections adjacent to the R Yare are in desperate need of improvement.	Ideally installation would be best when surface conditions are reasonably dry and undertaken outside the main visitor season.	I	B	Probably most efficient to employ contractor/project manager to complete the project end-to-end. Being adjacent to the river and a reasonably wide waterway construction of 'panels' could be undertaken offsite and delivered to installation location by boat, thus speeding the process and minimising further damage to the existing trails. May require further checks to ensure mitigation benefit.

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BRO7	Weavers' Way interpretation panels	Installation of 6x engaging interpretation panels with wildlife and/or heritage information about the Weavers' Way.	Norfolk County Council	An appreciation of the trail and its natural and cultural assets - engaging people to invest in their surroundings and understand its sensitive nature	This may be able to fit in and align with wider projects which could mean economies of scale and improve cost-efficiency	I	A	Trails such as the Weavers' Way are strategically important as they move people through the sensitive countryside on designated footpaths and encourage people not to damage the sensitive wildlife surrounding the trails - they also offer an alternative to the honeypot trails such as the Norfolk Coast Path. Good interpretation encourages dwell time and engages people about the importance of the landscapes they are passing through. We have had enquiries from parish councils along the route asking for upgraded interpretation as they can see its value
BRO8	Expansion of the electric boat charging network	Expansion of existing charging infrastructure to a wider number of mooring locations.	Broads Authority	Reduce oil and noise pollution from boats		M	A	
BRO9	Improve access within Hoveton Riverside Park	Improve access/management of all paths and canoe launch points within the site.	Broads Authority	Alternative provision for visitors to take pressure off the designated sites.		M	A	

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BRO1 Page 77	Broads education and outreach project within local schools and youth organisations	A project working with local schools and youth groups aiming to build links between young people and their local protected environments.	Broads Authority	Project will increase ecological understanding and promote responsible recreational behaviour. The project will also develop links with school staff and parents, and promote the development of young person-led social action campaigns within schools and youth groups (which may be achieved in collaboration with established youth service providers and community groups). The campaigns will promote appropriate environmental messages and behaviours to local communities via social media and events, and the project will also develop local youth ambassador/ranger programmes leading to longer-term positive actions for local protected habitats and species via (e.g.) interpretation materials, surveys, litter picks, etc.		M	E	
	Establishment of Acle Bridge Hub	Creation of an Acle Bridge Hub, with accessible facilities and paths within the site.	Broads Authority	Alternative provision for visitors to take pressure off the designated sites.		L	B	May require checks to ensure effective as a mitigation measure

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
BRO1 2	Face-to-face engagement with boat owners/operators re: best practice	Funding for workshop/site visits to discuss best practice with respect to disturbance, damage, and pollution within protected sites.	Broads Authority	Reduce observed impacts via behaviour change/education.		I	C	
BRO1 3	Provision of environmental info packs on hire boats	Creation of paper-based info packs identifying wildlife sites/wildlife and how to minimise impacts.	Broads Authority	Reduce observed impacts via behaviour change/education.		I	C	
BRO1 4	Wider roll-out of decontamination facilities for boat users/hirers	Installation of watercraft decontamination facilities at an increased number of mooring sites (3 for purposes of calculation).	Broads Authority	Reduce scope for spread of invasive species and pollution incidents.		M	A	
BRO1 5	Broads Wildlife Engagement Ranger position	Role will pilot dog training sessions with existing providers, and provide wildlife and disturbance-related information to boat users/providers and members of the public. Role will also communicate TBC campaigns (e.g. "protecting the invisible", "slow boat to wildlife", etc).	Broads Authority	Will change the behaviour of dog and boat users/owners to minimise disturbance impacts around the target Broad SAC and Broadland SPA.		I	C	Potential crossover with BRO13 & BRO14. Scope to cover Breydon Water too

The Wash

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
W2	Limits of Acceptable Change Study: Phase 2	Following on from the Norfolk Coast LAC: Phase 1 study (undertaken in 2022). Phase 2 will incorporate stakeholder workshops, visitor surveys, and a boundary extension to the previously mapped area.	Norfolk Coast Partnership	Management and mitigation of increasing visitor numbers In The Wash and North Norfolk Coast	Seasonal surveys. Time to implement management measures	I	G	This will be the next steps following the LAC study. Has previously received HMM Fund (development levies). This work will be complimentary to GI RAMS.
W3	Limits of Acceptable Change Study: Phase 3	Following on from the Norfolk Coast LAC: Phase 2 study. The study will focus upon the implementation of management measures.	Norfolk Coast Protected Landscapes, NCC	Mitigation and management of increasing visitor pressures in The Wash and North Norfolk Coast	Looking to implement long term change. Will include monitoring and adaption over 10 + years	M	G	This would follow the proposed Phase 2. Could be in the form of a pilot followed by roll out and support or could move straight to roll out (depending on results of Phase 2). The project will likely attract contributions in kind from land managers etc.
W4	Hunstanton footpath diversion	Diversion of an existing footpath running alongside Hunstanton Golf Course across the river to adjacent land, including the installation of 2x bridges, 3x interpretation boards, and viewing platforms.	Norfolk Coast Protected Landscape, NCC	Following the creation of wetlands on River Hun in 2023, diversion of footpath and creation of viewing platforms will allow people to view this with minimal impact to waders etc. Potential to disperse access away from other areas.	Permission to divert footpath can take 1 year	M	B	Match funding would be available.

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
W5	Plovers in Peril: Project Officer	Project Officer role to develop, oversee, and deliver protection for Ringed Plovers and Oystercatcher in North-west Norfolk.	RSPB	Breeding ringed plover and oystercatcher numbers have declined in NW Norfolk. The project Officer will implement nest protection measures, including the development of a volunteer team to engage beach users to reduce disturbance. The project officer would be permanent and year round. This enables time for project development out of season. It also enables protection measures to limit disturbance to wintering wader flocks roosting on the beaches to be put in place.	The project is already being funded using mitigation funding from Kings Lynn & West Norfolk (but just for limited time window). The level of disturbance will require the presence of fencing and wardens for the foreseeable future.	I	C	Oversees development of nest protection measures, volunteer team, community support and event programme to support the development of suitable behaviours around beach-nesting birds, notably changing visitor awareness and understanding and some likely benefits with respect to the protection of little terns associated with The Wash SPA.

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
W6	Plovers in Peril: Assistant Project Officer	Assistant role to the Project Officer to support monitoring and effective management of breeding beach-nesting birds.	RSPB	6-month role to support the Project Officer to effectively deliver the protection and behaviour change work	The project is already being funded using mitigation funding from Kings Lynn & West Norfolk (but just for limited time window). Ongoing funding needed to maintain protection work and continue to develop community engagement	I	C	The Assistant Project Officer role provides essential support to effectively deliver the project. By taking on the monitoring of the project this allows the Project Officer the capacity to develop the volunteer team and develop the community engagement element of the project. Wardening alongside the presence of fencing and signage is essential to effective protection for breeding and wintering species.
W7	East Norfolk beach-nesting birds: Fencing	Installation of (seasonal) post and rope fencing around beach-nesting bird nesting areas.	RSPB	Rope cordon to highlight breeding areas and keep beach-users away from nests to avoid trampling.	Project team already in place until 2026 to erect fencing, Funding needed post-2026	I	A	The fencing is needed to direct beach users along the beach and avoiding nests. This is in conjunction with wardens to reinforce message about suitable behaviours.

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	Implementation	Type	Notes
W8	Plovers in Peril: Signage	Interpretation, information and warning signs.	RSPB	Signage needed to direct beach users away from nests and inform them of the need for the protection measures.	The project team already have a signage plan, but new signage is required. Signage and replacements will continue to be required.	I	A	Signage an important tool to convey messages. However, without wardens being present experience is that messages can be ignored. Signage is not sufficient on its own to effectively mitigate disturbance impacts, but is part of the toolkit to manage recreational pressures.
W9	Plovers in Peril: Welfare facilities – portaloo	Welfare facilities to support staff and volunteers.	RSPB	At the Snettisham end of the project area there is no toilet. This has welfare implications for the project team. Hiring a portaloo between April and September annually.	The project team already have plans in place for a portaloo but funding is required.	I	C	Provision of a toilet will support health and safety requirements for the project team and ensure the welfare of the project team.
W10	Path resurfacing and access improvements	Accessibility improvements at Holme NNR.	Norfolk Trails, NCC, NWT	Enhancing existing structures. Access for all, allowing continuity of access. Mitigate recreational impacts. Protects sand dunes, ground nesting birds	Timing based around natterjack season and consents	I	A	Consents would be required.
W11	Peddars Way Access Improvements	Addition of rest points, and installation of interpretation at key points, along the Peddars Way to encourage visitors away from the honey pot coastal sites.	Norfolk Trails, NCC	Reduce impacts of visitor pressures by distributing pressure to areas that can accommodate. Benefiting a wide range of sensitive sites in the West Norfolk area		I	A	This project will provide regular rest stops improving accessibility of stretches of the route. This project is scaleable in size / funds / times.

4. Implementation

Habitats Regulations Assessment (HRA) implications

- 4.1 This plan provides the confidence for local planning authorities, as competent authorities under the Habitats Regulations, that appropriate mitigation can be secured at the relevant European sites to address cumulative impacts from planned housing growth.
- 4.2 Local Plans and individual planning applications will still need to be subject to necessary checks through Habitats Regulations Assessment (HRA). Where likely significant effects are triggered (in the absence of mitigation) as a result of increased recreation, appropriate assessment will be necessary and this will need to show that appropriate mitigation is secured and in-place. As such, HRAs will need to be able to demonstrate that this plan, alongside any SANGs provision and the overall mitigation approach set out in the GIRAMS, are implemented and working, with the mitigation measures appropriately targeted to the housing coming forward.

Types of development

- 4.3 The Action Plan relates to residential development and some other types of use including some tourist-related development, as summarised in Table 5.
- 4.4 Contribution to the strategic mitigation will enable applicants to secure the appropriate avoidance or mitigation measures and enable the relevant Planning Authority to conclude through appropriate assessment that there is no adverse effect on the integrity of the relevant coastal European sites from recreation.
- 4.5 The strategic mitigation is established primarily to address the cumulative and in-combination effects of widespread residential housing growth. Furthermore, mitigation will also be relevant to non-residential development, including tourism but due to the varied nature of potential applications these will also need consideration on a case-by-case basis, as set out in Table 5. For residential development contributions will be on a per unit basis, and this may not necessarily be directly transferable to other situations such as visitor attractions, food outlets or tourist development. Nonetheless it should be possible for such applications to be mitigated through the strategic approach, on a bespoke basis. Such cases will require more detailed consideration, checks with Natural England and the mitigation checked through appropriate assessment.

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Table 5: Relevant types of development

Use Type/Class	Likely Significant Effect	Mitigation requirements
Hotel (C1) Including boarding houses and guest houses	Possibly, case-by-case decision depending on potential to rule out tourists visiting the coast	Per unit contribution if necessary, 1 room = 1 residential unit unless evidence otherwise
Residential Institutions (C2/C2A) Accommodation and care to people in need of care including nursing homes, hospitals and secure institutions	Possibly, case-by-case decision and depends on the type of scheme and level of mobility of residents	Per unit contribution if necessary, 1 room = 1 residential unit
Residential Institutions (C2/C2A) School, college or training centre	Yes	1 room = 1 residential unit
Dwelling houses (C3) Any net increase	Yes	Per dwelling contribution
Dwelling houses (C3) Extension or 'Granny' Annex	Possibly, case-by-case decision and depends on whether functions as a separate unit	Per dwelling contribution if necessary
Dwelling houses (C3) Replacement dwelling	No	
Retirement dwellings (C3)	Yes	Per dwelling contribution
Houses in Multiple Occupation <6 residents	Yes	Per dwelling contribution
Houses in Multiple Occupation (C4/Sui Generis over 6 residents)	Yes	Per dwelling contribution for every extra room >6 residents
Holiday Dwellings (Sui Generis)	Possibly, case-by-case decision depending on potential to rule out tourist use of European sites	Per unit contribution if necessary and adjusted accordingly as evidence allows
Gypsy and Traveller Pitches (Sui Generis) Net new pitches that are either temporary or permanent	Yes	Per dwelling contribution
University managed student accommodation	Yes	Each self-contained cluster flat or studio = 1 unit
Café, food outlet or visitor attraction	Possibly, case-by-case decision based on application, location and links to coast	Contribution decided on a case-by-case basis as relevant

Costs per dwelling

Cost estimates

- 4.6 Costs for the package of measures included in this action plan are set out in Appendix 1. These are approximate costs, largely based on the figures provided directly through the questionnaire process or drawing on similar measures in other strategic mitigation schemes.

- 4.7 Mitigation needs to be secured for the lifetime of the impact, and therefore some elements may need to be required in-perpetuity. While some measures in this strategy are short-term or one-off measures, others need to run for many years, often extending well outside the Plan period. It will therefore be necessary to set aside costs for the long-term funding of mitigation and Appendix 1 gives an indication of which measures are likely to require in-perpetuity funding. These will need to be subject to regular review, as for example tern fencing and warden costs may change over time as a result of changes to the coastline and where the birds are nesting.
- 4.8 For some measures, it is likely that the whole cost of the project does not need to be met through developer contributions. For example, Little Tern fencing and wardening at the East Coast locations has been undertaken by the RSPB for many years, with funding to date coming in part from Great Yarmouth Borough Council (through developer contributions), alongside funding from other sources including the RSPB and Natural England. In this case it seems sensible and proportionate that the measures are part funded as mitigation, given the long-running nature of the project and other funding sources available (with no cause for concern that they might be withdrawn). However, this is contrary to some other strategic mitigation schemes (for example tern protection by the RSPB at Chesil Beach on the south coast is funded entirely by Dorset Council as mitigation for housing growth), and some caution is required. We have calculated costs of some projects such as the East Coast tern protection on the basis that not all costs will be through developer contributions, and a percentage contribution is given for each measure in Appendix 1. These percentages should be subject to review and recognition that the availability of other funding sources may change over time. Given the importance of some of these protection measures, were other funding sources not to be available they would need to shift to being 100% funded through the RAMS.
- 4.9 We have also allocated a percentage contribution to some measures whereby the project potentially has only some mitigation benefit, but where the project is perhaps driven by other priorities or needs. For example, new or upgraded toilet facilities. These may have a mitigation benefit (in the case of toilets by drawing visitors to more robust locations where engagement, infrastructure and access management measures are focussed and consolidated), but these will need to be clearly justified and agreed prior to funding being awarded. Furthermore, it is recognised that some of the projects in the Brecks area will be relevant to West Suffolk. Within the broad zone of influence for the Brecks it is estimated that around 70% of the future housing growth will be in Norfolk and 30% in West Suffolk, and as such a 70% contribution is applied to measures that would be applicable across both authorities.

- 4.10 Costs are further summarised in Appendix 2 to give a breakdown by site, by type of measure and by priority. Costs are summarised by European site in Figure 1, which gives the total cost of the measures allocated to each site (and with a separate bar for those measures that apply across all sites). It can be seen that the costs are highest for the East Coast, followed by the North Norfolk Coast and the Wash.

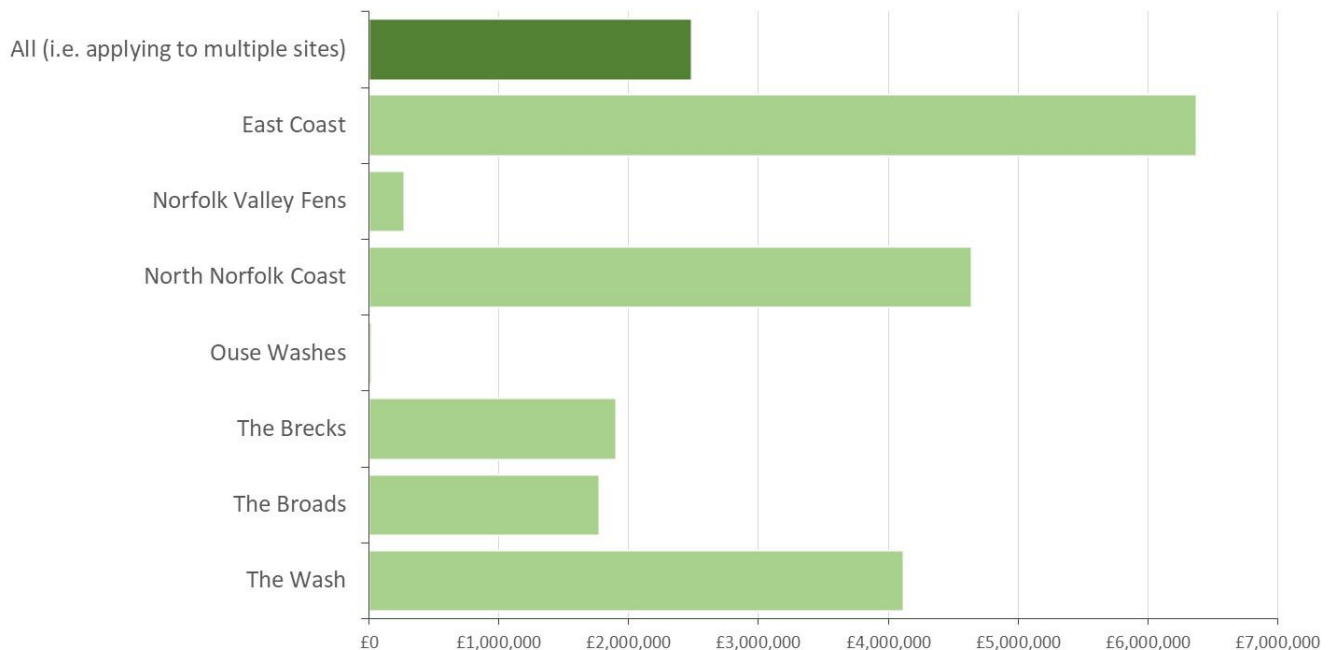


Figure 1: Summary of cost breakdown by site, i.e. total costs for the mitigation for each

- 4.11 Some reserve projects are also listed in Appendix 3. These may provide opportunities for mitigation should other projects fail to come forward or mitigation is required in specific locations to tie in with the housing growth. The projects listed are however mostly large and significant infrastructure projects and some may have commercial benefit for the organisations involved. As such they need further consideration and checks and part funding may be more appropriate according to the amount mitigation benefit incorporated in the project design. These projects have not been used to calculate the cost of mitigation or the per dwelling cost set out below.

Per dwelling cost

- 4.12 The overall cost of the mitigation measures in Appendix 1 is £22 million (rounded up to the nearest million to provide contingency). With housing growth over the 25-year period covered by this strategy estimated to be around 74,950 dwellings, the per dwelling cost for package of mitigation measures is £293.53. This would need to be reduced to take account any contributions already collected and not so

far spent (i.e. in line with existing GIRAMS) and then updated annually in line with inflation.

- 4.13 This sets a level of developer contribution which may need further adjustment to reflect administration fees etc. The tariff is higher than the one set in the original GIRAMS and this is due to a more refined and detailed list of projects and ensuring adequate budget to cover mitigation in-perpetuity. It should be subject to regular review and adjusted as relevant in accordance with any further changes in anticipated housing growth or delivery costs.
- 4.14 This per dwelling tariff is relatively low compared to many other strategic mitigation schemes. Examples of the per dwelling costs for other mitigation schemes (typically limited to just one or a small number of European sites), include:
- £443 (1 bedroom dwellings) to £1150 (5 bedroom properties)⁵ for the Solent;
 - £914 per dwelling for mitigation relating to the Chilterns Beechwoods SAC (Dacorum Borough Council⁶);
 - £277 (flats) and £406 (houses) for the Dorset Heaths⁷ (costs as per the SPD produced in 2020).

Review and governance

- 4.15 It will be important, looking forward, that there is flexibility and regular review as to how money is spent and what is needed on the ground. A number of factors (such as Covid, extreme weather conditions, the cost of living crisis) have had an impact on visitor behaviour, visitor numbers, access infrastructure etc. in recent years. Changes in housing delivery will effect how much mitigation revenue is collected. There is uncertainty as to how priorities might need to shift in the future, for example as a result of coastal change, and such uncertainty can only be addressed through good monitoring, adaptive mitigation and regular review.
- 4.16 The plan includes costs for a delivery manager. Their role will be critical to foster collective working, support delivery bodies in delivering mitigation and report back to planning authorities. The delivery manager will need to ensure mitigation

⁵ See <https://birdaware.org/solent/about-us/our-strategy/developer-contributions/>

⁶ [https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/chilterns-beechwoods-special-area-of-conservation/chilterns-beechwoods-special-area-of-conservation-\(sac\)---mitigation-strategy](https://www.dacorum.gov.uk/home/planning-development/planning-strategic-planning/new-single-local-plan/chilterns-beechwoods-special-area-of-conservation/chilterns-beechwoods-special-area-of-conservation-(sac)---mitigation-strategy)

⁷ <https://www.dorsetcouncil.gov.uk/documents/35024/309543/Dorset+Heathlands+2020-2025+SPD+Adopted.pdf/bda03d74-cbc9-57c9-b3be-6253ba2825fb>

delivery reflects the locations where it is required and is spatially relevant to housing growth. This will require recording housing growth within each European site, potentially mapping that growth and ensuring mitigation measures relate to where the housing growth comes forward. This may mean some projects need to shift in priority or change. The list of projects will need continued review.

- 4.17 It is also possible that additional opportunities may arise, for example as a result of changing land ownership. It may be that over time projects come forward at sites such as Breydon Water or Dersingham and Roydon (which currently have no specific projects) and as such would benefit inclusion in the mitigation delivery (depending on where housing growth takes place). It is important therefore that the overall management is flexible and responsive enough to enable developer contributions to be shifted to different components of the strategy easily. Annual reviews of budgets and the ability to adjust finances as appropriate (with rapid approval) will be key.
- 4.18 It will therefore be necessary to have the appropriate governance structure and support in place so that the delivery manager can allocate funds and so that developer contributions can be efficiently allocated to projects. Terms of reference for the governance and oversight have been established by the local planning authorities and include a Board who will agree a programme of projects for delivery and oversee implementation of the agreed programme.
- 4.19 This Action Plan covers the period through until 2046. The Plan should be reviewed and updated on at least a 5-year basis (alongside annual reviews of budget and tariffs adjusted annually). These regular updates provide the confidence that mitigation is appropriate, meets the impacts associated with the level of housing growth and is targeted to the right locations.

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Appendix 1: Mitigation costs

This table lists the same measures as set out in Table 4 with estimated costs for each. Rolling costs are ones that may need to be applied across multiple years or spread over time (as opposed to one-off costs). Some measures are given rolling costs that span up to 80 years, reflecting in-perpetuity delivery. The total cost of each project is adjusted for some projects to give a strategy cost; this is based on the % adjustment figure which is applied where projects may have other funding sources, may not entirely be around mitigation delivery or where other local authorities (outside Norfolk) may contribute.

Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contribu- tion	Reason for % contribution adjustment
Page 90	County-wide dog project	£30,000	£20,725	10	£237,250	£237,250	Capital costs to cover website design, branding and equipment (such as gazebos). Running costs to pay for part time post with support costs, 0.5 fte equivalent post with costs extended to cover 10 years. £27,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs.	100	
	A2 Gazetteer of dog walking sites	£15,000	£2,000	10	£35,000	£35,000	Estimated costs to set up and as dynamic, costs to update regularly	100	
	A3 Visitor monitoring at relevant sites		£50,000	4	£200,000	£200,000	£40,000 per survey, with cost to be repeated 4x.	100	
	A4 Online hub for reporting problem behaviour by light aircraft	£5,000	£1,000	10	£15,000	£15,000	Estimated cost to establish some kind of reporting system	100	
	A5 County-wide car park review (capacity, charging, economy, coastal change, etc)	£30,000			£30,000	£30,000	estimated cost for commission of survey/review with delivery manager support	100	
	A6 Norfolk focused events for stakeholders		£5,000	10	£50,000	£50,000	Indicative budget to allow hiring of venue, promotion and organisation	100	

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Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contribu- tion	Reason for % contribution adjustment
A7	Site ambassador (volunteer) network and engagement training		£3,500	10	£35,000	£35,000	Small budget for meetings/events and training	100	
A8	AONB comms position (covering whole coast)		£41,450	2	£82,900	£82,900	£27,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs.	100	
A10	Delivery Manager		£59,000	25	£1,475,000	£1,475,000	£40,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs. Costed for 25 years to cover strategy period. Scope to extend longer by dropping post to part time role towards end of period	100	
Page 91 A11	Fire consultancy support		£10,000	5	£50,000	£50,000	Rolling budget to allow specialist consultancy support (e.g. review of fire management plans) and potential for collaborative events/workshops/discussion.	100	
	Monitoring strategy	£25,000			£25,000	£25,000	estimated cost for consultancy commission to produce a strategy	100	
A12	Project specific monitoring		£25,000	10	£250,000	£250,000	Estimated cost to allow targeted monitoring. Monitoring approaches should be straightforward and simple, and therefore not require large budget	100	
EC1	East Norfolk beach-nesting birds: Team Leader		£47,000	80	£3,760,000	£1,504,000	The cost includes: base salary of £28,300 per annum (based on 230 working days), NI, c.£4000 for support costs (e.g. office, IT equipment etc), 10% contingency and 6% pension	40	Percentage applied to reflect partial contribution from LPAs given range of threats and pressures

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Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contrib- ution	Reason for % contribution adjustment
EC2	East Norfolk beach-nesting birds: Community & Volunteer Officer		£43,100	80	£3,448,000	£1,379,200	The cost include: base salary of c.£25,700 per annum (based on 230 working days), NI, c.£4000 for support costs (e.g. office, IT equipment etc), 10% contingency and 7% pension	40	Percentage applied to reflect partial contribution from LPAs given range of threats and pressures
EC3	East Norfolk beach-nesting birds: Senior Beach Warden		£17,687	80	£1,414,960	£565,984	The cost include: base salary of £12,000 per annum (based on 115 working days), NI, c.£1,500 for support costs (e.g. office, IT equipment etc), 10% contingency and 7% pension	40	Percentage applied to reflect partial contribution from LPAs given range of threats and pressures
Page 92	East Norfolk beach-nesting birds: Beach Wardens		£83,000	80	£6,640,000	£2,656,000	The cost include: base salary for 6 wardens of £21,200 per annum (based on 90 working days), NI, c.£1200 for support costs (e.g. office, IT equipment etc), 10% contingency and 7% pension. This equates to c.£13,800 per warden	40	Percentage applied to reflect partial contribution from LPAs given range of threats and pressures
EC5	East Norfolk beach-nesting birds: Fencing		£5,000	80	£400,000	£160,000	To replace the fence every 2-3 years would require: c.£3000 for poultry netting, rope, wooden posts and electrics, and c.£1500 for the electric wire per fence. The poultry netting may last for a longer period of time, but this will be dependent on vandalism and other damage that may occur through the season (e.g. tidal wash out).	40	Percentage applied to reflect partial contribution from LPAs given range of threats and pressures

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contrib- ution	Reason for % contribution adjustment
EC6	East Norfolk beach-nesting birds: Signage	£3,500	£750	80	£63,500	£25,400	The cost is for the upfront investment in 2 A-frames (e.g. £150 each), 2 A1 interpretation panels (e.g. £500 each) and smaller information and warning signs per colony for Eccles and Winterton. The initial cost also covers signage for North Denes beach to provide interpretation of the importance of the site and to enable protection measures to be implemented as appropriate at the start of the season.	40	Percentage applied to reflect partial contribution from LPAs given range of threats and pressures
EC7	East Norfolk beach-nesting birds: welfare facilities for staff and volunteers		£2,000	80	£160,000	£64,000	This covers £1000 to hire a portacabin at Winterton between May to mid-August. There is £1000 to hire the portaloos between May to mid-August.	40	Percentage applied to reflect partial contribution from LPAs given range of threats and pressures
EC8	Vegetation monitoring at Winterton Dunes NNR		£12,000	2	£24,000	£24,000	Assumes surveys at 5 year intervals. Estimated cost of £12,000 per survey should provide for reasonable coverage	100	
NVF1	Buxton Heath car park upgrade and signage/waymarking	£50,000			£50,000	£50,000	estimated budget for works	100	
NVF2	Improvements to car park, path resurfacing and installation of sculpture trail at Holt Country Park	£120,000			£120,000	£120,000	Notional budget to cover works and commissioning of appropriate sculptures	100	
NVF3	Provision of dog bins	£1,800	£1,200	80	£97,800	£97,800	£600 per bin initial cost for timber-fronted dual waste bin. £400 per bin per year to empty. 3 bins. Replacement on 10 year basis.	100	

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contrib- ution	Reason for % contribution adjustment
NNC2	Seasonal dog restrictions	£200,000	£10,000	80	£1,000,000	£1,000,000	Costs as suggested by the estate to cover wages, depreciation and sundries	100	
NNC3	QR codes for information panels on public footpaths	£8,000	£2,000	5	£18,000	£18,000	Set-up fee for equipment, plus time to instal each QR code point. The rolling cost would be a small payment to each person updating the info - approx. £100/annum over 20 QR code sites	100	
NNC5	Interpretation panels at Branodunum Roman Fort	£20,000	£500	6	£23,000	£23,000	Previous interpretation projects include design	100	
NNC6	Signage audit and installation of interactive interpretation points		£20,000	4	£80,000	£80,000	Based on previous experience of similar projects	100	
NNC7	Path surface improvements & bridge provision on Stiffkey Saltmarsh	£400,000	£2,000	10	£420,000	£420,000	Indicative quotes & past path projects	100	
NNC8	Accessible path at Morston Quay	£300,000	£2,000	10	£320,000	£160,000	Estimate based on previous path projects	50	% contribution applied as mitigation benefits may vary according to design and NT have indicated other funding may be available in part
NNC9	Interpretation materials for visitors at Morston Quay	£55,000	£500	6	£58,000	£58,000	Previous interpretation projects include design	100	
NNC10	Review of dog restrictions around Blakeney Harbour and Freshes and implement findings	£10,000	£2,000	10	£30,000	£30,000	Based on estimate of initial report, followed by rolling programme of signage/communications but rolling costs would be dependent on the measures recommended	100	

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Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contrib- ution	Reason for % contribution adjustment
NNC11	Seasonal wardening around Blakeney, Blakeney Point, Stiffkey, and Brancaster		£35,000	60	£2,100,000	£2,100,000	Based on cost of 2 rangers working seasonally (6 months a year) as provided by NT. Rolling cost applied at 60 years on assumption that ranger coverage would drop over time from 2 posts to 1. So costs potentially cover 1 post for 80 years and 1 post for 40.	100	
NNC13	Establish "Gateway to Blakeney Point"	£30,000	£20,000	10	£230,000	£230,000	Cost based on rough estimate of hut and signage, plus the cost of salaries for 2 Assistant Rangers working for 5 months (March- July) each year.	100	
NNC14	Develop visitor offer at Friary Hills (SANG)	£5,000	£1,000	20	£25,000	£25,000	Very rough estimate of infrastructure improvement and then annual maintenance	100	
NNC15	Wardening and signage on Stiffkey Saltmarsh	£2,000	£20,000	10	£202,000	£202,000	Cost based on some basic signage costs, plus the cost of employing two seasonal assistant rangers (March - July inclusive), including clothing and kit.	100	
NNC16	Signage and zoning of access within Young's Land (SANG)		£200	10	£2,000	£2,000	Based on ranger time to do the grass cutting, plus maintenance of equipment.	100	
NNC18	Blakeney Point - water presence (additional capacity)	£20,000	£20,000	10	£220,000	£220,000	Cost based on provision of boat if required, plus the cost of employing a seasonal member of staff (March - July inclusive), including clothing and kit.	100	
NNC20	Further promotion of the Coastal Code		£15,000	5	£75,000	£75,000	Assumes part-time role over 10 year period	100	
OW1	Monitoring surveys for detection/spread of invasive species and watching brief on recreation use		£2,000	10	£20,000	£20,000		100	

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Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contrib- ution	Reason for % contribution adjustment
BRE1	Enhancements to Rights of Way network	£50,000			£50,000	£35,000	notional budget and aim should be for small pot to fund works identified in review	70	overlap with W Suffolk
BRE2	Promotion of footpaths and walking routes	£20,000			£20,000	£14,000		70	overlap with W Suffolk
BRE3	Review of footpaths	£10,000			£10,000	£7,000	budget to allow report and site visits	70	overlap with W Suffolk
BRE4	Strengthening of CRow access restrictions		£2,000	10	£20,000	£14,000	flexible pot to fund additional signage as required	70	overlap with W Suffolk
BRE5	New dog bin installation at Cavenham Heath	£1,200	£920	30	£28,800	£20,160	£600 per bin initial cost for timber-fronted dual waste bin. £400 per bin per year to empty. 2 bins. Replacement on 10 year basis.	70	overlap with W Suffolk
BRE6	Rabbit focus group		£2,500	10	£25,000	£17,500		70	overlap with W Suffolk
BRE7	Signage and interpretation across the Thetford Forest Estate SSSI/SPA	£90,000	£5,000	5	£115,000	£80,500	General maintenance/upgrades cost in Rolling Cost phased over 5 years as an approximation guideline	70	overlap with W Suffolk
BRE8	Rebranding & repurposing of a sensitive site (Santon Downham)	£30,000	£2,000	5	£40,000	£28,000	Initial capital spend to rebrand and manage the site effectively with the change in use for visitor experience, away form water and picnic to historic interest and walking Rolling cost is maintenance of signage	70	overlap with W Suffolk
BRE9	Increased ranger coverage within Thetford Forest/surrounding area		£41,450	50	£2,072,500	£1,450,750	1 fte equivalent post with costs extended to cover 50 years. £27,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs.	70	overlap with W Suffolk
BRE12	Interpretation panels at Cavenham Heath	£10,000	£10,000	3	£40,000	£28,000	£2,500 per board for production of timber frame and graphic panel, delivery and installation. Estimate of 4 boards. Costs allowed for 3 replacements	70	overlap with W Suffolk

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contrib- ution	Reason for % contribution adjustment
BRE13	Fenced dog exercise area at Lynford Arboretum extension	£30,000	£4,000	5	£50,000	£50,000	Initial creation of fenced facility (two sides of fencing already exist here) plus ongoing maintenance estimations	100	
BRE14	Installation of hard (barrier) infrastructure at selected access points	£200,000	£5,000	5	£225,000	£157,500	Initial infrastructure creation plus maintenance	70	overlap with W Suffolk
BRO3	Replacement of Visitor Observation Hide at Strumpshaw Fen RSPB Reserve	£75,000	£0		£75,000	£37,500	Based on investigation undertaken for previous grant bid. Cost of foundation is significant based on the depth of peat substrate, and limited access for heavier machinery, leading to the need for a specialist contractor	50	suggested contribution as replacement of existing facility
BRO5	Resurfacing of overflow car park at Strumpshaw Fen RSPB Reserve	£50,000			£50,000	£25,000	Based on previous quotes for specific design and materials to cover the required surface area.	50	suggested contribution as upgrade to existing facility
BRO6	Upgrade of visitor trails at Strumpshaw Fen RSPB Reserve	£100,000			£100,000	£50,000	Costs based on a calculation per square metre extrapolated for up to 1.5km	50	suggested contribution as upgrade to existing facility
BRO7	Weavers' Way interpretation panels	£15,000	£1,500	80	£135,000	£135,000	Based upon previous experience/similar projects. We might look to upgrade or replace every 10 years at a similar cost of £15000	100	
BRO8	Expansion of the electric boat charging network	£50,000			£50,000	£50,000	Indicative cost suggested by Broads Authority	100	
BRO9	Improve access within Hoveton Riverside Park	£40,000			£40,000	£40,000	Broads Authority to cover annual rolling costs.	100	

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Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contrib- ution	Reason for % contribution adjustment
BRO10	Broads education and outreach project within local schools and youth organisations	£0	£37,000	10	£370,000	£370,000	Staff costs 0.5 FTE post; (based on current salaries) £1,559.18 /month (£18,710.16 per annum) Additional costs; - Transport: to get young people out on site £5,000 - External Provider costs (Youth workers/ Specialists/Arts workers etc) £5,000 - Resources and materials: £2,000 - Training for staff, school staff, youth workers: £3,000	100	
BRO11	Establishment of Acle Bridge Hub	£100,000			£100,000	£100,000	Broads Authority to cover annual rolling costs	100	
BRO12	Face-to-face engagement with boat owners/operators re: best practice		£15,000	10	£150,000	£150,000	Assumes part-time role over 10 years	100	
BRO13	Provision of environmental info packs on hire boats	£15,000	£500	10	£20,000	£20,000		100	
BRO14	Wider roll-out of decontamination facilities for boat users/hirers	£20,000			£20,000	£20,000		100	
BRO15	Broads Wildlife Engagement Ranger position		£78,000	10	£780,000	£780,000	Staff costs 1 FTE post; (based on current salaries) £38,000 per annum Additional annual costs Total £20,000 - External Provider costs (dog trainer etc) £5,000 - Resources and materials: £5,000 - Training for staff and boat yards: £10,000	100	
W2	Limits of Acceptable Change Study: Phase 2		£50,000	1	£50,000	£50,000	Based on quotation received.	100	

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Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contrib- ution	Reason for % contribution adjustment
W3	Limits of Acceptable Change Study: Phase 3		£60,000	5	£300,000	£300,000	Staff time for support and admin, expert costs for monitoring, travel costs. Could also include a small grant fund where grants under £5k are awarded to support management changes. After 5 years, minimal staff costs / expert costs will be required as the project becomes self sustaining. In reality, the fifth years funds may be spread over the final 5 years.	100	
W4	Hunstanton footpath diversion	£250,000	£20,000	3	£310,000	£77,500	Indicative costs when enquiries made during 2023.	25	suggested contribution as requires careful scrutiny to ensure mitigation benefit and benefits relative to cost may be small
W5	Plovers in Peril: Project Officer		£43,100	80	£3,448,000	£2,586,000	The cost includes: base salary of £25,700 per annum (based on 230 working days), NI, c.£3500 for support costs (e.g. office, IT equipment etc), 10% contingency and 7% pension, with a total cost of c.£43,100.	75	75% contribution to reflect project focus not entirely SPA linked and project not solely around disturbance and visitor awareness
W6	Plovers in Peril: Assistant Project Officer		£15,300	80	£1,224,000	£918,000	The cost include: base salary of £23,500 per annum (based on 115 working days), NI, c.£2100 for support costs (e.g. office, IT equipment etc), 10% contingency and 7% pension, with a total cost of c.£15,300.	75	75% contribution to reflect project focus not entirely SPA linked and project not solely around disturbance and visitor awareness

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Code	Mitigation measure	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Strategy Cost	Notes on how cost calculated	% contribu- tion	Reason for % contribution adjustment
W7	East Norfolk beach-nesting birds: Fencing		£500	80	£40,000	£30,000	Funding to replace wooden posts and rope that has deteriorated over the course of a season.	75	75% contribution to reflect project focus not entirely SPA linked and project not solely around disturbance and visitor awareness
W8	Plovers in Peril: Signage	£2,000	£500	80	£42,000	£31,500	The costs are derived from: 2 A-frames, 2 interpretation panels, and smaller information signs.	75	75% contribution to reflect project focus not entirely SPA linked and project not solely around disturbance and visitor awareness
W9	Plovers in Peril: Welfare facilities – portaloos		£500	80	£40,000	£30,000	Cost is for portaloos hire from April till September annually.	75	75% contribution to reflect project focus not entirely SPA linked and project not solely around disturbance and visitor awareness
W10	Path resurfacing and access improvements	£15,000			£15,000	£15,000	Based on previous experience and quotations for projects in a similar area (including distance covered).	100	
W11	Peddars Way Access Improvements	£30,000	£10,000	5	£80,000	£80,000	Based on experience of other projects however this cost can be scaled up or down accordingly	100	

Appendix 2: Breakdown of mitigation costs

The tables below break down the estimated cost of mitigation by site and by type of measure and by potential implementation.

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Type of measure	All	East Coast	Norfolk Valley Fens	North Norfolk Coast	Ouse Washes	The Brecks	The Broads	The Wash	Total
A Small/temporary infrastructure		£185,400	£97,800	£358,000		£357,160	£245,000	£156,500	£1,399,860
B Significant infrastructure project with long term benefit			£170,000	£580,000		£28,000	£212,500	£77,500	£1,068,000
C Direct on-site engagement		£6,169,184		£3,550,000		£1,478,750	£950,000	£3,534,000	£15,681,934
D SANG type project, deflecting visitors away from European site (but linked to European site rather than totally discrete)				£50,000					£50,000
E Off-site engagement	£355,150			£75,000		£14,000	£370,000		£814,150
F Monitoring	£490,000	£24,000			£20,000				£534,000
G Review or investigative projects to determine further details around mitigation delivery	£30,000			£30,000		£7,000		£350,000	£417,000
H Support for organisations delivering mitigation and collaboration	£1,610,000					£17,500			£1,627,500
Total	£2,485,150	£6,378,584	£267,800	£4,643,000	£20,000	£1,902,410	£1,777,500	£4,118,000	£21,592,444

Implementation	All	East Coast	Norfolk Valley Fens	North Norfolk Coast	Ouse Washes	The Brecks	The Broads	The Wash	Total
Immediate (quick wins and easy to implement)	£2,072,250	£6,378,584	£97,800	£3,613,000		£1,667,910	£1,135,000	£3,740,500	£18,705,044
Medium term (projects that may require further build up of funds or longer lead in time)	£412,900		£170,000	£1,030,000	£20,000	£234,500	£542,500	£377,500	£2,787,400
Longer term (projects requiring long lead in time, preparation or where there are further checks or steps needed)							£100,000		£100,000
Total	£2,485,150	£6,378,584	£267,800	£4,643,000	£20,000	£1,902,410	£1,777,500	£4,118,000	£21,592,444

Appendix 3: Reserve Project Ideas

The following projects have not been included in the calculations of the overall mitigation cost or per dwelling tariff. They are projects suggested by relevant stakeholders/delivery bodies and they potentially do have mitigation benefit. Some comprise large, expensive infrastructure projects and as such they may be more long-term projects or opportunities. Some have clear commercial benefit for the delivery body and as such should be carefully considered and the mitigation benefit checked before any mitigation money is awarded. The projects are included in the report as they may provide opportunities for part funding or they make take on relevance if other projects fail to come forward or there are spatial gaps in mitigation delivery in relation to where housing growth occurs.

Code	Site	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Page 102 NNC10	North Norfolk Coast	New toilet block at Morston Quay	Provide (additional) permanent toilets to meet visitor demand for tourism.	National Trust	Meet increased demands from others publicising area & give space to educate significance of area.	New build anticipated for 2024	£800,000			£800,000	Cost estimate provided by the NT and based on quotes
BRE11	The Brecks	Lynford Water redevelopment project	Redevelopment of Lynford Water. Key elements of the investment/ development to be delivered in scope comprise : redesign of car park access, toilets, catering facility infrastructure close to beach (to be operated by a 3rd party business, with a seasonal	Forestry England	To effectively manage and reduce impacts of unmanaged recreational use and anti-social behaviours. The increase in visitors, dog walkers and interest in water sports (currently unmanaged so an 'at risk' activity) has a direct bearing on increased fires, loss of habitat quality and increased disturbance. H & S is also a concern here due to little presence of staff. The site is a popular bird watching and walking		£2,000,000	£60,000	10	£2,600,000	Initial one-off development works cost + rolling staff and maintenance costs

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Site	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
Page 103			option), a water recreational offer operated by a 3rd party business (kayaks, SUPs, quiet water recreation offer), and potential for appropriate sized events to be held on site (e.g. outdoor cinema, theatre, educational offers (with potential for an overnight stay offer provided by a 3rd party business in consideration).		location with zero facilities. The plan will balance impacts with nature in a managed way, promoting education of visitors and understanding of habitats while providing a high class visitor experience that generates income and tells the Forestry England story.						
	BRO4	Visitor toilets upgrade at Strumpshaw Fen RSPB Reserve	Upgrade/refit of existing visitor toilets to make them DDA compliant.	RSPB	Strumpshaw Fen is the nearest wildlife attraction to Norwich and receives c30,000 visitors/ann. These visitors are existing wildlife watchers and those new to nature and the local area. The visitor toilets provide a primary function but are dated and in desperate need of upgrading and reformatting to make them DDA compliant.	October through to March to minimise disruption during the peak visiting season.	£50,000	£2,500	10	£75,000	Based on recent calculations for grant aided project. Rolling cost covers annual contractor cleaning

Norfolk Recreational Impact Avoidance and Mitigation Strategy Action Plan

Code	Site	Mitigation measure	Description	Parties involved in delivery	Justification	Timing considerations	One-off/ Capital cost	Rolling cost	Multiplier for rolling cost	Total cost	Notes on how cost calculated
W1	The Wash	Installation of public toilets at Snettisham RSPB Reserve	Installation of waterless WooWoo public toilet at RSPB Snettisham, within the Wash Ramsar/SPA/SAC/SSSI.	RSPB	There are currently no facilities on or around the reserve at Snettisham, with the nearest public toilet at Heacham South Beach, 3 miles away. The aim is to help visitors access the reserve, in a sustainable way. Provision of toilets will prevent people from looking for suitable areas to go outdoors, which has the potential to damage habitat and disturb birds around the reserve.	Given that the location is within the designated sites, planning approval may take more than 1 year but this is not anticipated.	£18,000			£18,000	These costs have been obtained from the manufacturer. Depending on the model selected, there may be a small annual cost of around £800 for the toilet to be pumped.
BW2	Breydon Water	Project to assess frequency/ impact of waterskiing in Breydon Water SPA	Project will gather evidence which will inform potential future regulation of waterskiing within the SPA and inform design of mitigation.	Broads Authority	Will reduce disturbance to the SPA through greater clarity of issues and how best to address			£30,000	5	£150,000	estimate of cost for necessary monitoring work and basic study plus budget for follow up interventions

Norfolk Strategic Planning Framework



OCTOBER 2024

MEMORANDUM OF UNDERSTANDING

**Norfolk Recreational Impact Avoidance and Mitigation (RAMS) Programme
Fund Governance and Management**

**Memorandum of Understanding
Norfolk Recreational Impact Avoidance and Mitigation (RAMS) Programme
Fund Governance and Management**

Between:

NORWICH CITY COUNCIL
AND
BRECKLAND COUNCIL
AND
BROADLAND DISTRICT COUNCIL
AND
NORTH NORFOLK DISTRICT COUNCIL
AND
SOUTH NORFOLK COUNCIL
AND
BOROUGH COUNCIL OF KINGS LYNN AND WEST NORFOLK
AND
BOROUGH COUNCIL OF GREAT YARMOUTH
AND
THE BROADS AUTHORITY

‘the parties’

1. Purpose

- 1.1. This Memorandum of Understanding (‘MOU’) sets out the agreed working relationship between the parties regarding the governance and management of the Norfolk Recreational Impact Avoidance and Mitigation (RAMS) Fund.
- 1.2. This MOU will be valid until it is terminated by the Parties. It will be reviewed and updated only where any of the signatories deem it necessary.
- 1.3. This MOU is not intended to create legal or binding obligations and will not be enforceable. It describes the understanding between the parties for the governance and management of the Norfolk Recreational Impact Avoidance and Mitigation (RAMS) Fund.

2. Background to the Management of the GIRAMS Scheme

- 2.1. Since it was first identified that recreational pressures from growth were having an impact on designated Habitats Sites across Norfolk, Norfolk Local Planning authorities have been working on the production of a mitigation scheme and looking at how such a scheme would be implemented.
- 2.2. As the scheme is a county wide one it would be challenging and inefficient for it to be managed by all LPAs and so over the course of the last 4 years a number of options have been explored in detail about how it would be best managed. These options include the scheme being managed by Natural England, local nature groups and via a standalone organisation. During 2022/23 significant effort was put into setting up a scheme managed by the county council and more recently via Norfolk Environmental Credits. All options mentioned have been ruled out for various reasons.
- 2.3. Although Nutrient Neutrality has impacted the contributions to the scheme, Natural England have made it clear that they are concerned that the management of the scheme has not been implemented given that the tariff has been collected since 31st March 2022. This has made it imperative that a solution is found. Given that other options have been exhausted, it has led to the conclusion that the scheme is best managed by one of the Norfolk LPAs that are impacted by the scheme and a request was made in late 2023 for LPAs to come forward to help provide a solution.
- 2.4. A proposal was put forward for Norwich City Council to host the Delivery Manager, there would be a number of benefits to this:
 - As Norwich don't have any of the habitat sites within its administrative it would be unlikely to be seen to 'favour' any particular sites in the county and the 'reach' of Norwich residents covers many of the impacted sites.
 - It is centrally located in the county
 - Norwich have already successfully managed central funds on behalf of the districts for the work of the NSPF and for Nutrient Neutrality
 - Norwich already host the Norfolk Strategic Planning Programme Manager and this role can be used to manage the individual that is brought in given their close involvement with the work so far.
 - Some sort of interim arrangement needs to be in place to ensure that as soon as the footprint mitigation plan work is complete projects can start to be brought forward; the Norfolk Strategic Planning Programme Manager can cover the Delivery Manager role in the short term until funds are available in all districts to support the Delivery Manager role.
- 2.5. Footprint Ecology have been asked for an independent view of the cost for the delivery manager and £59K has been quoted for this role. This is calculated as: £40,000 annual salary, plus 35% (to cover NI, superannuation, etc.) and £5000 per annum support costs).
- 2.6. The option for Norwich to host this role was discussed at the December 2023 NSPG and was generally supported. In late March 2024 the proposal was put forward to Norwich City Council's 'ELT' meeting for approval to host and employ the role, and this was agreed.

3. Roles of the parties

- 3.1. Having already considered a number of different organisations in the management of the GIRAMS tariff and the concerns raised within these as to how the fund is managed, it is important that these concerns are clearly addressed in the approach to NCC managing the fund. This means that a straightforward approach should be taken to reduce complexity and possible issues. The role and NCCs responsibilities should be limited as set out below:
- NCCs role in the management of the GIRAMS fund will be limited to the recruitment, employment and management of the delivery manager on behalf of all LPAs in the county and the holding of a central 'pool' of funds collected by all LPAs.
 - Other than for the management of the delivery manager role (and any related support -eg IT or HR support etc.), no other resource will be provided by NCC for the management of the GIRAMS fund unless agreed by LPAs and paid for via the fund.
 - The LPAs will transfer funds collected every 6 months to NCC. For LPAs that collect the tariff via S111, funds should only be transferred to NCC once the development has planning permission, and the development has commenced.
 - The delivery manager will be informed by each authority of the amount collected and ready to be transferred, for which developments it applies and a Purchase Order will be raised by each LPA for this amount. NCC via the delivery Manager will then invoice each LPA for this amount.
 - Solely to ensure that tariff monies are ringfenced for use on GIRAMS mitigation and do not have to be returned to Local Planning Authorities, the LPAs should not include repayment clauses as standard within any S106 agreements. All tariff monies should be used within a reasonable time period to avoid any repayment requests.
 - NCC will not be responsible for any work delivered by the delivery manager, any projects that are part of the programme or any failure of projects either to be delivered or to have the expected impact
 - Responsibility for the programme will rest with the GIRAMS board. Once the programme is approved, the delivery manager will be able to release funds from the central pool to the agreed projects.
 - NCC via the delivery manager will regularly update LPAs on the funds held in the programme and how money from the fund has been spent and on which projects
 - The role of the Delivery manager will be limit to the organisation of the programme and to the management of some county wide projects where consultants are involved eg county wide dog project/gazetter, monitoring etc
 - Where projects involve the employment of staff either temporary or permanent, this will only be via a third party/stakeholder who will generally be the site owner/land manager etc.
 - Also project delivery of new infrastructure to a site eg footpaths, signage, fencing etc. will also have to be organised, managed and delivered by a third party or stakeholder. Any maintenance will also be the responsibility of the third party or stakeholder.
- 3.2. The Delivery Manager role will be managed by the Norfolk Strategic Planning Programme Manager who's time will also be charged to the fund (up to the agreed budget of £5,000 per annum) and any issues with the performance of the Delivery Manager can be raised with them.
- 3.3. The Delivery Manager will be recruited by Norwich City Council in line with the Job Description and Person Specification as agreed (see appendix 1).
- 3.4. The governance of the GIRAMS fund is set out in further detail in the GIRAMS Board Terms of Reference. This will form the basis of how the programme is developed and the schemes agreed to deliver the GIRAMS Mitigation for Norfolk.

This will be achieved through the working values of the collaborative working between the parties:

- Work in good faith and in an open, co-operative and collaborative manner.
- Work on a consensual unanimous basis.
- Work together in the spirit of mutual trust and integrity.
- Add value and ensure a commitment to deliver.
- Communicate openly about concerns, issues and opportunities.
- Adhere to the governance models as agreed in the Terms of Reference for the board.
- Act in a timely manner.

3.5. No Party shall make any public statement with respect to this MOU without the prior written consent of the other Parties, unless it is required by law or regulation, in which case it will (to the extent that it is legally possible and / or reasonably practicable) consult with the other Parties as to the timing and content of such disclosure.

3.6. It should be noted that by signing this document, the parties are not committing to legally binding obligations. It is intended that the parties remain independent of each other and that their collaboration does not constitute the creation of a legal entity, nor authorise the entry into a commitment for or on behalf of each other.

Signed on behalf of NORWICH CITY COUNCIL

Signed on behalf of BRECKLAND COUNCIL

Signed on behalf of BROADLAND DISTRICT COUNCIL

Signed on behalf of NORTH NORFOLK DISTRICT COUNCIL

Signed on behalf of SOUTH NORFOLK COUNCIL

Signed on behalf of BOROUGH COUNCIL OF KINGS LYNN AND WEST NORFOLK

Signed on behalf of BOROUGH COUNCIL OF GREAT YARMOUTH

Signed on behalf of THE BROADS AUTHORITY

Job description



NORWICH
City Council

Job title:	Norfolk RAMS Delivery Manager		
Post number:			
JE reference:		Grade of job:	7/8
Service:	Planning		

Job purpose:

The Norfolk RAMS (Recreational Impact Avoidance and Mitigation) Delivery Manager will support Local Planning Authorities in meeting their statutory obligations to mitigate against adverse effects at internationally designated sites from the 'in-combination' impacts of residential development that is forecast to take place across Norfolk.

The role will lead on the day-to-day management of the Norfolk RAMS mitigation programme, maintaining operational and financial oversight, ensuring compliance with the overall Scheme. The role will be responsible for the development and monitoring of relevant, externally delivered projects/work-streams, in line with the programme objectives. These will include strategic partner initiated and delivered projects. A key function of the role will be the management of an extensive stakeholder network (Norfolk's LPAs, Natural England, Landowners, Conversation bodies, Nature partnerships, and other stakeholders) and steering collaborative working, in order to deliver the mitigation to prevent additional disturbance to internationally designated wildlife sites and habitats.

Key responsibilities of the role include:

- Development and delivery of Norfolk RAMS mitigation programme, agreeing the programme with the RAMS Board and reporting progress to the Board
- Bringing forward projects for the programme and establishing how they are best delivered based on where mitigation is required
- Overseeing the implementation of the programme and the strategic partners delivery of the projects
- Monitoring the success of the mitigation, the ongoing impacts on sites and the suitability of the mitigation package going forward
- Partnership working, promoting strong working relationships with a diverse range of stakeholders, often with competing and conflicting requirements
- Reviewing and monitoring of project progress, liaising and reporting to the Environment Manager on matters relating to strategy, resource, risk, schedule and budgetary control of projects
- Keeping up to date with relevant legislation
- Source and support partner projects for funding opportunities to support the RAMS Programme objectives
- Working across various diverse locations within the County, with a mix of office and some field work

Organisation structure:



Key result areas

1	Ensure the Norfolk RAMS Programme is delivered in line with it's objectives. Maintain financial and operational oversight of the programme and projects, reporting to Norfolk RAMS Board and Norfolk Strategic Framework Programme Manager.
2	Maintain details of contributing developments and the designated site mitigation these have funded for reporting to Norfolk LPAs.
3	Manage projects/work-streams, directing strategic partners to deliver work on time and to budget.
4	Review and report on project programmes and budgets. Provide clear information on projects for governance and reporting to the Norfolk RAMS board.
5	Develop and support partnership working with an extensive, cross-sector range of organisations, to ensure projects are delivered by the right organisations in the most cost effective way, maximise impact and avoid duplication of effort. This will include working with Norfolk LPAs, Non-Government Organisations, Government Agencies, Community Groups, Landowners, Nature/Conservation Partnerships and elected Members.
6	Monitor impacts of completed projects on recreational disturbance, investigate further work required and input into further strategies to mitigate and reduce disturbance.
7	Managing the RAMS fund, ensuring contributions are received and project payments are made, raising invoices and purchase orders as required.
8	Lead effective secretariat function to the Norfolk RAMS Board including scheduling and administering meetings
9	Act as an ambassador for the authorities, ensuring a professional conduct is always maintained. Facilitate liaison between all Norfolk LPAs, the Norfolk RAMS board, external stakeholders and associated projects/initiatives, to avoid duplication of work and to add value/maximise results

General requirements

Post holders will be expected to be flexible in their duties, including occasional evening and weekends, and carry out any other duties commensurate with the grade and falling within the general scope of the job, as requested by management.

Duties and responsibilities must be carried out in accordance with relevant Norwich City Council policies and procedures, within legislation and any code of professional ethics of relevant professional body.

All employees are expected to maintain a high standard of customer care in the context of the Council's core values, to uphold the Equality and Diversity Policy and health and safety standards and to participate in personal learning and development necessary to the post.

Person Specification



Job title:	Norfolk RAMS Delivery Manager		
Post Number			
Reports to (title):	Norfolk Strategic Framework Programme Manager	Service:	Planning
JE reference:		Grade of job:	7/8

Essential criteria

1. Qualifications	<p>An appropriate degree qualification or equivalent experience with transferable skills and experience</p> <p>Business Administration/Project Management qualification or equivalent experience</p> <p>PRINCE2 Practitioner, MSP programme management certification, or equivalent other qualification or applied experience.</p> <p>Evidence of continued professional and personal development</p> <p>Valid driving license</p>
2. Experience	<p>At least 3 years post graduate experience with a local authority or conservation organisation.</p> <p>Experience of directing projects to deliver environmental outcomes, through collaboration and engagement with project teams, partners and external stakeholders</p> <p>Experience of developing bid documents</p> <p>Significant experience in cross-sector stakeholder working and management of project partners</p>
3. Knowledge/ understanding	<p>Knowledge of environmental designations and legislation</p> <p>Competent verbal communications skills including public speaking/presentations at meetings and conferences</p> <p>Knowledge of Government Environment policy and strategy</p> <p>Fieldwork and report writing skills</p> <p>Understanding of conservation management</p> <p>Knowledge and understanding of EU Procurement Directives and government best practice for contract management</p> <p>Knowledge and understanding of external funding programmes</p>

4. Skills/ability

Management of stakeholders

Strong analytical skills, able to demonstrate budget and delivery monitoring

Excellent attention to detail with a proactive, practical and commercial approach

Strong communication and interpersonal skills to develop and manage relationships with stakeholders and partners. Able to effectively communicate ideas and concepts verbal and in writing. Able to manage expectations and negotiate sound commercial outcomes.

Takes responsibility for outcomes is proactive and dynamic in solving problems

Ability to prioritise effectively

Flexible to support changes to work plans

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Norfolk Strategic Planning Framework



APRIL 2024

TERMS OF REFERENCE

**Norfolk Recreational Impact Avoidance and Mitigation (RAMS) Programme
Governance**

And

**Norfolk Recreational Impact Avoidance and Mitigation Strategy Board
(Norfolk RAMS Board)**

Section 1 - Norfolk Recreational Impact Avoidance and Mitigation (RAMS) Programme Governance

1.1 Background

The RAMS mitigation programme is a programme set up by the 8 Local Planning Authorities of Norfolk. It aims to deliver the mitigation necessary to avoid the likely adverse effects from the 'in-combination' impacts of residential development that is forecast to be delivered across Norfolk until 2047 at internationally designated sites. It is important to acknowledge that the RAMS exists to mitigate these 'in-combination' effects specifically. It is not a mechanism to deliver mitigation for recreational impacts from individual residential developments alone or individually; this must be provided on or near the development site.

To this extent, the RAMS is 'strategic' in nature. The RAMS identifies a detailed programme of strategic mitigation measures at the internationally designated sites which would be funded by contributions from residential development schemes. The strategic approach of a RAMS has the following advantages:

- It provides developers, agents and planning authorities with a comprehensive, consistent and efficient way to ensure that appropriate mitigation for residential schemes is provided in an effective and timely manner.
- It is pragmatic: a simple and effective way of protecting and enhancing the internationally important wildlife in Norfolk and will help to reduce the time taken to reach planning decisions;
- It provides an evidence based and fair mechanism to fund the mitigation measures required as a result of the planned residential growth; and
- The notion of RAMS and this strategy itself is endorsed by Natural England and has been used effectively to protect other Habitats Sites across England and is therefore the most effective way to mitigate in-combination recreational impacts.

1.2 Purpose

The purpose of Norfolk RAMS Programme Fund is to deliver the programme of projects identified in the Norfolk RAMS Action Plan. The project programme will be created and updated by the RAMS Delivery Manager who will be hosted by Norwich City Council. The programme will be agreed and overseen by the Norfolk RAMS Board. The decision on the timing and delivery of the projects will be determined by the Norfolk RAMS Board, who will ensure the projects are being delivered in line with GIRAMS Strategy and the planned GIRAMS action plan.

Section 2 - Norfolk RAMS Board Function

2.1 Delivery of Norfolk RAMS Programme

The implementation of the agreed programme of projects will be overseen by the Norfolk RAMS Board. With the support of the Delivery Manager, the Board will use the mitigation package and RAMS Action Plan to determine the programme of projects for the forthcoming years and their timeline for delivery. This will create a programme delivery plan. This plan will set out how each project will be delivered and the appropriate accountable body for delivery of each project.

2.2 Process for determining the timing of the delivery of projects

Based on the GIRAMS mitigation package and RAMS Action Plan, the Delivery Manager will assess where contributions have been received for development and which relevant internationally designated wildlife sites will be impacted by this development based on the Zones of Influence set out in Norfolk RAMS Action Plan. The priority of the projects will be based on the RAMS action plan.

The work programme plan will then require prior approval by the RAMS Board where the work programme will be reviewed by each Council on an annual basis with any agreed changes being fed through to the delivery manager. The approval by each Council of the work programme will be completed annually.

The Delivery manager will need to ensure that forth coming projects are ready to deliver once sufficient funding has been received.

2.3 Commissioning of projects

Once the Norfolk RAMS Board has agreed the programme of projects then the Delivery Manager will work with stakeholders to deliver the projects in accordance with the City Council's rules of financial governance and contracting.

2.4 Funding of RAMS Programme

The Delivery Manager will be responsible for managing the programme working with stakeholders and land managers who will procure and deliver the projects as part of the programme. In order that the Norfolk GIRAMS board has the authority to deliver the projects in the RAMS programme Norfolk LPAs pass over their contribution to the fund to Norwich City Council. The local authorities will pass contributions to the fund on a half yearly basis. Local authorities cannot deduct any proportion of the tariff to cover administration costs.

2.5 Reporting

Contribution Expenditure Reporting

The Norfolk RAMS Board will be provided with a report annually on where contributions have been spent in line with where development has commenced, this information will assist the LPAs annual requirement to set out how the fund has been used.

Monitoring & Reporting of projects

The delivery manager will report twice yearly to the Norfolk RAMS Board on the progress of its individual projects in accordance with the signed-off project delivery timeline. This reporting will include as a minimum:

- Progress against the agreed project plan including milestones

- Progress against the agreed budget, including justification for variances and slippages highlighting any variations in terms of timescale, costs, resources and funding
- Where there are slippages on programmes, how these will be addressed and potential impact on overall delivery of the programme
- Major risks and their mitigation

Where issues arise then the Norfolk RAMS Board have the authority to reprioritise the programme of projects. This includes:

- Bringing projects forward where other projects have been delayed.
- Delaying forthcoming projects to enable funding to be reassigned to existing projects whose costs have increased.
- Stopping projects should the need arise.

2.6 Project Completion

Delivery of projects – signing and adoption after completion

The Norfolk RAMS Board will sign off each completed project. Once the project has been delivered it will be adopted by the applicable body (eg Landowner/Manager of site) and on-going maintenance of these assets will be the responsibility of the adopter.

Section 3 – Norfolk RAMS Board Structure

3.1 Norfolk GIRAMS Board Membership

The Core Group will consist of One Member from each of Norwich City Council, South Norfolk District Council, North Norfolk District Council, Breckland District Council, the Borough Council of King's Lynn and West Norfolk, Great Yarmouth Borough Council and the Broads Authority.

To support members the group will also include:

- One officer from each of Norwich City Council, South Norfolk District Council, North Norfolk District Council, Breckland District Council, the Borough Council of King's Lynn and West Norfolk, Great Yarmouth Borough Council and the Broads Authority.
- The Delivery Manager and Norfolk Strategic Framework Programme Manager
- Officers from Natural England (as required)

The membership of the group will be determined by each authority by nomination. Each authority should also nominate substitutes should the nominated Member not be able to attend particular meetings.

Membership of the Core Group will be kept under review and adjusted to reflect any changes to the district make up.

Chairmanship and vice chairmanship will be determined by the Board and reviewed each year.

3.2 Frequency of meetings

Every six month but initially further meetings may be required, at intervals to be agreed, hosted by one of the councils that form part of the group.

3.3 Secretariat

The secretariat for the group will be provided by the Delivery Manger.

3.4 Decision Making

The Norfolk RAMS Board will be granted the power, by each authority, to make decisions regarding the Norfolk RAMS fund and the projects it is used to deliver. Decisions made by the Norfolk RAMS Board will need to be unanimous. However the use of this fund will be determined by development which has commence and the zone of influence this development is in and therefore the role of the board is to scrutinise this process and ensure it is completed to the related regulations and guidance.

3.5 Exiting from GIRAMS Scheme

Should an authority wish to leave the GIRAMS scheme, they should provide 1 year's notice to other members.

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Agenda Item 7

REPORT TITLE	Planning In Health Protocol
Executive Summary	The purpose of this report is to consider progress made on the Planning in Health Protocol following endorsement by the Norfolk Strategic Framework
Options considered.	Not to endorse the Protocol.
Consultation(s)	The Action Plan has been informed by stakeholder engagement and the Norfolk Strategic Framework
Recommendations	<p>Members of the Planning Policy & Built Heritage Working Party:</p> <ul style="list-style-type: none"> I. note the updated content and the new approach to embedding health and wellbeing in spatial planning and II. recommend to Cabinet that the revised Planning for Health Protocol be used when preparing Local Plans and determining planning applications.
Reasons for recommendations	To ensure appropriate consideration of Health in Planning
Background papers	Health Protocol

Wards affected	All
Cabinet member(s)	Cllr Andrew Brown, Portfolio Holder for Planning & Enforcement
Contact Officer	Iain Withington, Acting Planning Policy Manager Iain.withington@north-norfolk.gov.uk

Links to key documents:	
Corporate Plan:	The report addresses themes: Meeting Our Housing Need, Investing in Our Local Economy and Infrastructure and A strong, Responsible & Accountable Council.
Medium Term Financial Strategy (MTFS)	N/A

Council Policies & Strategies	Adopted and emerging local plan
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Corporate Governance:	
Is this a key decision	No
Has the public interest test been applied	No
Details of any previous decision(s) on this matter	Norfolk Strategic Framework 23rd October 2024 <ul style="list-style-type: none"> PPBHWP June 2023

1. Purpose of the report

- 1.1 The purpose of this report is to consider progress made on the Planning in Health Protocol following endorsement by the Norfolk Strategic Framework.

2. Introduction & Background

- 2.1 The Planning in Health Protocol provides a collaborative way of working between the ICB estates team and health partners, Public Health, Local Planning Authorities (LPAs), and helps ensure the impacts on health and care services from local plans and a growing population are measured, understood, mitigated, and managed appropriately.
- 2.2 The Council first adopted the use of the Health Protocol in late 2017 and endorsed an updated version August 2019. The previous updated 2023 version was endorsed by the Council, in so far as it relates to contact details, factual changes, and reference systems but the working party did not endorse the content of the protocol in its entirety
- 2.3 Working party members requested that officers sought further changes through the Norfolk Strategic and reconsidered the scope of the Protocol including mental health, dentistry and public health in the broader sense, and addresses the issues around practical implementation.
- 2.4 The updated documents included reflects the new NHS structures and changes in national planning policy. The main updates to this version of the Protocol are the addition of a new Section 1 (How to use this protocol), more detail on the tools and data used by the Integrated Care Board, ICB, to calculate the impacts on healthcare services, as well as revisions to the text describing changes to the health and social care system and its governance within which the Protocol operates.
- 2.5 In responding to the clarifications on dentistry the revisions highlight that the ICB took over delegated responsibility for commissioning dental services from NHS England in April 2023, and that they will now be captured through this protocol and process.

- 2.6 A long-term plan for dentistry has been developed and agreed, with a vision to build stability and resilience across our dental services; improve access to oral health care for Norfolk and Waveney's population; and, to reduce health inequalities.
- 2.7 A number of actions and focus areas are covered in the plan, but with regards to the protocol process and the capturing of dentistry within it – the next step for the ICB estates team is to continue work with the primary care commissioning team to ensure demand and capacity is understood, and calculations like those ran through HUDU for GP practices, highlighting the specific impacts, can be ran for dentistry and included with our responses.
- 2.8 In relation to information how the ICB calculates developer contributions, with specific concerns regarding the evidence calculation shared the document now includes additional detail on the modelling tool used to calculate the impacts on healthcare services and its infrastructure. They have developed and include a new table of metrics within our response letters to planning consultations that highlight the existing local infrastructure, the capacity of that infrastructure, the workforce, as well the additional demand from the proposed development. (page 34)
- 2.9 The protocol is a multiagency-owned document between planning authorities and health organisation and was agreed at the Norfolk Strategic Planning Group. It has also been endorsed by the Health and Wellbeing Board District Council Subcommittee in September. The draft has been approved by the ICB executive management team and is with NHSE for review.

3. Options

None presented other than not to endorse the updated document.

4 Legal Implications

- 4.1 None identified as a direct result of this report.

5 Risks

- 5.1 In the failure to implement or follow the protocol could result in delivery of poorer services and reputational damage

6 Net Zero Target

- 6.1 No assessment has been made against the council's [Net Zero 2030 Strategy & Climate Action Plan](#)..

7 Equality, Diversity & Inclusion

- 7.1 Under section 149 of the Equality Act 2010, the 'general duty' on public authorities is set out as follows:

A public authority must, in the exercise of its functions, have due regard to the need to –

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.2 There are no direct implications on equality within this report.

8 Community Safety issues

N/A

9 Conclusion and Recommendations

Members of the Planning Policy & Built Heritage Working Party:

- I. note the updated content and the new approach to embedding health and wellbeing in spatial planning and**
- II. recommend to Cabinet that the revised Planning for Health Protocol be used when preparing Local Plans and determining planning applications.**

Appendices

Appendix 1: Planning in Health Protocol August 2024

End

PLANNING IN HEALTH PROTOCOL

An engagement protocol between Norfolk and East Suffolk Local Planning Authorities, the Norfolk and Waveney Integrated Care Board, Health Partners and Public Health Norfolk and Public Health Suffolk

Revised August 2024 – Version 1.1

FOREWORD

This revision is based upon the previously published version from August 2019 and has come about in recognition of a need for greater collaboration between local planning authorities, health service organisations, and public health departments in local government to plan for future growth and to promote health in planning. It reflects changes in national planning policy and the need for health service organisations to deliver on the commitments within the NHS Long Term Plan which sets out goals and actions for the future of the NHS.

This revision recognises the emergence of the [Norfolk and Waveney Integrated Care System \(ICS\)](#), an umbrella body bringing together the organisations planning, buying, and providing publicly funded healthcare to the population of the area. On 1st April 2020 the five Clinical Commissioning Groups (CCGs) were merged into the Norfolk and Waveney CCG (N&WCCG). Subsequently On 1st July 2022, the N&WCCG was superseded by the Norfolk and Waveney ICS which includes an Integrated Care Partnership (ICP), and an Integrated Care Board (ICB) called NHS Norfolk and Waveney ICB (N&W ICB).

This revision recognises the latest publication of the revised [National Planning Policy Framework](#), which sets out government's planning policies for England and how these are expected to be applied.

This revision streamlines the processes and simplifies and shortens the protocol to make it easier to use and embed into the work of all partner agencies. Updated population healthcare needs assessments as well as population and demographic change estimates will be published separately to increase the longevity of this document and facilitate timely updates. These will support plans to deliver new healthcare infrastructure formulated by NHS colleagues.

Following the Covid-19 pandemic and the long-term aspirations of the NHS to increase service delivery, planning in the health sector will need to be reviewed, which will lead to changes over the coming years. Notwithstanding this, the Protocol remains a valuable tool to ensure appropriate and continued engagement between the Norfolk and East Suffolk Local Planning Authorities and the health service communities.

ACKNOWLEDGEMENTS

This protocol was jointly prepared by staff at Norwich City Council, Broadland Council, and Norfolk County Council on behalf of all Norfolk and East Suffolk LPAs. It also built heavily upon other work across the country including The London Healthy Urban Development Unit (HUDU) which gave permission for use of their 'Planning Contribution Model'.

Amendments in 2022/23 have been made in collaboration with Public Health at Norfolk County Council, Local Planning Authorities, the Norfolk & Waveney ICS, and N&W ICB in response to requests made by the Norfolk Planning Members Forum.

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1. HOW TO USE THIS PROTOCOL

1.1. WHAT IS THE PURPOSE OF THIS PROTOCOL?

The Planning in Health Protocol (hereafter the Protocol) presents a process describing how relevant NHS organisations, Norfolk & Suffolk County Councils, Public Health and the Norfolk and East Suffolk Local Planning Authorities jointly engage to ensure that health considerations are adequately accounted for in plan making and in planning applications and their subsequent developments. In this context, the term “health considerations” includes planning for health service provision (e.g. the provision of enough healthcare facilities to meet population needs) as well as ensuring that health promotion is considered in the design and provision of developments (e.g. the provision of walking and cycling infrastructure, or maintenance of good air quality).

Updates to this version of the Protocol are the addition of a new Section 1 (How to use this protocol), more detail on the tools and data used by the ICB to calculate the impacts on healthcare services, information on the Healthcare Infrastructure Development Plans, as well as revisions to the text describing changes to the health and social care system and its governance within which the Protocol operates.

1.2. WHO SHOULD USE THIS PROTOCOL?

The Protocol should be used by Norfolk and East Suffolk Local Planning Authorities (LPAs), the Norfolk and Waveney Integrated Care System (ICS) Strategic Estates Group (who will liaise with relevant health and social care partners to ensure where possible, health infrastructure is suitable for its needs and the population that it serves), and the Norfolk and Suffolk County Councils’ Public Health teams. Parts of the Protocol, the ‘Health Planning Checklist’ at the end of the document, can also support the LPAs in any discussions they have with developers. **It is the responsibility of the planning officer in the LPA overseeing a development plan (local plan, neighbourhood plan etc.) or planning application to invoke the protocol.**

1.3. IN WHAT CIRCUMSTANCES SHOULD THE PROTOCOL BE USED?

The Protocol should be used when consultation is required on the potential health impact and considerations associated with a development. This will be for:

- A housing development of 50 dwellings or more
- A development of less than 50 dwellings but which is still deemed to potentially impact on health services significantly.
- A development that includes a care facility, housing for the elderly, or student accommodation
- A development that involves the significant loss of public open space
- Any other type of development that could have significant health implications.

Defining what is deemed to have an impact on health services or significant health implications is challenging. It could, for example, be related to likely impacts on vulnerable populations, or to do with uses for employment sites. In cases where the planning officers are unsure the protocol should be used.

Other developments, such as those related to transport, minerals, or waste, are not considered in this protocol as these are covered under existing structures, processes, and legislation.

1.4. AT WHAT POINT IN THE PLANNING PROCESS SHOULD THE PROTOCOL BE USED?

The Protocol should be used at all points in the planning process from pre-planning discussions (when the need for elements such as a [Health Impact Assessment](#), a methodology used to judge the potential health effects of a policy, programme or project on a population, can be considered), the outline process (when the initial likely health considerations associated with any development can be scoped in or out and design implications can be flexibly considered) to the full planning application (when health considerations can be assessed in detail and any final modifications recommended).

1.5. WHAT ARE THE ACTIONS THAT THE PROTOCOL DESCRIBES?

At the *pre-planning application stage*, the ICS Strategic Estates Group and Public Health partners will be provided with information on the likely application and given the opportunity to comment. As part of their feedback, they will provide a view within 21 days (subject to negotiated extension time), on the key areas of focus of any Health Impact Assessment that is required.

At the *outline planning application stage*, the ICS Strategic Estates Group and Public Health partners will provide general comment within 21 days (subject to negotiated extension time) on health considerations in outline proposals that meet the inclusion criteria to be covered by this protocol. At this stage the ICS Strategic Estates Group will also calculate and model the specific demand and capacity impacts of the proposal and include this when responding to the consultation.

At the *full planning application stage*, the ICS Strategic Estates Group and Public Health partners will provide comments if appropriate on full planning applications that meet the inclusion criteria to be covered by this Protocol. These comments will be provided within 21 days of receipt of the request for comment, (subject to a negotiated extension time). Responses will be reported in the planning officer's report.

1.6. WHAT OTHER ACTIVITIES SHOULD TAKE PLACE?

In addition to the Protocol being initiated as required, the LPAs, ICS Strategic Estates Group and Public Health teams should be in regular contact. This will include:

- The sharing of the Annual Monitoring Report (AMR) produced by each LPA at the end of the calendar year with the parties engaged in the Protocol.
- An annual meeting between all parties covered by the Protocol to consider the data within the AMRs, assess how well the Protocol is working, and discuss any other strategic and upcoming issues.
- Attendance at other meetings on an ad-hoc/as-needed basis. This might include an LPA Local Plan Meeting where a development with significant health considerations is being considered or regular 'Place' based planning and health meetings.

1.7. WHAT TOOLS AND INFORMATION ARE AVAILABLE TO SUPPORT THIS PROTOCOL?

This document contains a checklist tool, detailed background information, and data used by the ICS Strategic Estates Group in the planning process and how the Protocol integrates with it.

- The “Healthy Planning Checklist” tool is provided in Appendix 1. It provides a practical tool to assist developers and their agents when preparing development proposals as well as LPAs in policy making and in the application process. It also provides a framework for public health teams when considering health and wellbeing impacts of development plans and planning applications.
- The “Detailed background Information” section of this document (Section 2 and beyond) provides a detailed description of the current planning and health systems and structures (as of December 2023) as well as providing more information on the operation of the Protocol and how it integrates with those systems and structures. Further, it details the relevant partners to this Protocol by name. It is recommended that those not familiar with the Protocol or local planning for health process read this section before engaging.
- The “HUDU modelling tool” is used by the ICS Strategic Estates Group to model the specific impact of new developments on healthcare infrastructure. The tool is detailed in section 4.2 of this Protocol and additional technical guidance can be found at Appendix 2.
- Alongside the HUDU tool, demand and capacity modelling is used by the ICS Strategic Estates Group to indicate existing areas of capacity or constraint across its infrastructure, as well as highlight the impacts of future demand placed upon it.
- Infrastructure Development Plans will highlight the specific requirements and proposed projects across health infrastructure in response to local plans and planned population growth. The plans are covered in section 4.1. The IDPs will be shared with local planning colleagues to feed into local plans.

1.8. WHO ARE THE CONTACTS?

The local planning officer invoking and overseeing the implementation of the Protocol for a given development should use the following contact email addresses. Please make it clear that any contact is associated with the implementation of the Protocol.

NHS ICS Estates: nwicb.icsestates@nhs.net

NCC Public Health: phplanning@norfolk.gov.uk

SCC Public Health: phplanning@suffolk.gov.uk

2. DETAILED BACKGROUND

The importance of planning decisions on the health and wellbeing of the population has been recognised since the 19th century when reforms brought about by town planners and public health practitioners resulted in improved health and life expectancy. Many of the major disease and health issues affecting the population in Britain today are impacted by the environment in which people live, work and play ([Marmot, 2010](#)). Spatial planning can have a major positive impact on improving the environment in which people live or, if the health impacts of developments are not adequately considered, it can adversely impact people's physical and mental health ([Ross and Chang, 2012](#)).

The [National Planning Policy Framework](#) (NPPF) requires local planning authorities to ensure that health and wellbeing and the health infrastructure are considered in Local and Neighbourhood Plans and in planning decision making. The revised NPPF 2023 reiterates the presumption in favour of sustainable development and now specifically includes economic, social, and environmental objectives. Government [guidance on promoting healthy and safe communities](#) also states that “the local plan promotes health, social and cultural wellbeing and supports the reduction of health inequalities”.

2.1. AIM OF THE PROTOCOL

To present an engagement protocol containing a documented process outlining the input and linking of relevant NHS organisations and Public Health agencies with local planning authorities for planning for housing growth and the health infrastructure required to serve that growth. This attempts to both better understand and consider health service needs arising from development; and also make explicit the impact that the planning process, from plan making to determining applications, can have on:

- Health,
- Well-being and
- Long term health service and infrastructure demand.

The protocol will enable health service providers across the ICS to plan for expanding communities in areas where new housing is to be built.

2.2. OBJECTIVES

Objectives for the protocol are:

- To establish a working relationship and set a protocol for engagement between Norfolk and East Suffolk¹ Local Planning Authorities (LPAs), and relevant health and social care partners within the ICS, Norfolk County Council (NCC) and Suffolk County Council (SCC) Public Health.
- To outline a standardised process for obtaining robust and consistent health and social care and public health information to inform plan making and planning decisions.
- To support appropriate health infrastructure, with technical input from appropriate public health, health, and social care information teams.

¹ East Suffolk is covered by two Integrated Care Systems (ICS), the Norfolk and Waveney ICS and the Suffolk and North East Essex ICS. This protocol only applies to the part of East Suffolk within the area of the Norfolk and Waveney ICS (which is essentially the former Waveney District Council area)

- To ensure that the principles of prevention, health and wellbeing are adequately considered in plan making and when evaluating and determining planning applications.
- To establish a collective response to planning consultations from relevant health and social care partners and commissioning organisations through the appropriate mechanism.
- To agree a defined threshold indicator for Planners to contact health and Public Health teams for input into planning applications and spatial plans.

2.3. ORGANISATIONS INVOLVED

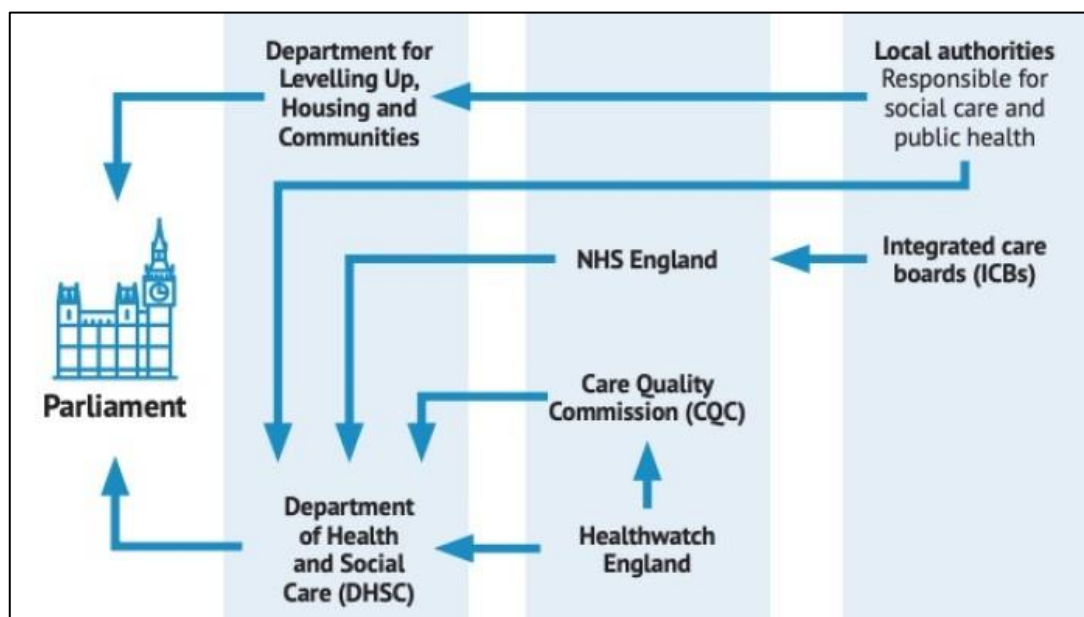
PUBLIC HEALTH FUNCTIONS IN ENGLAND

Following the Health and Social Care Act 2012, the NHS no longer has a public health function. Most of the public health workforce was transferred to Public Health England (PHE) at a national, regional, or sub-regional (in PHE Centre's) level and to local authorities at a local level, with a complementary set of roles and responsibilities. These have been further restructured in 2021 - [Public health system reforms: location of Public Health England functions from 1 October - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/public-health-system-reforms-location-of-public-health-england-functions-from-1-october) when the PHE role and responsibilities were divided between the UK Health Security Agency (UKHSA) and the Office for Health Improvement and Disparities (OHID).

The role of the newly formed ([UKHSA](https://www.gov.uk/government/organisations/uk-health-security-agency)) is to offer leadership and scientific and technical advice at all organisational levels. This involves working with local authorities and the NHS to reduce rates of infection and provide evidence to establish effective strategies and inform commissioning.

The reform of the PHE also established ([OHID](https://www.gov.uk/government/organisations/office-for-health-improvement-and-disparities)). As a focus on, for example, smoking cessation and obesity, it also has an aim to “act on the wider factors that contribute to people’s health, such as work, housing and education”. Like UKHSA this will have a regional as well as national perspective. Figure 1 shows a schematic of how the organisations are represented at national and local level.

Figure 1: NHS and Local Authority Structures (National to Local)



NHS England

NHS England leads the National Health Service (NHS) in England. Services are commissioned by integrated care boards (ICBs) overseen by NHS England on a regional and national basis. Through its regional teams, NHS England support local integrated care systems (ICS) to improve the health of the population, improve the quality of care, tackle inequalities and deliver care more efficiently.

Norfolk and Waveney Integrated Care System (ICS)

The [Health and Care Act 2022](#) put ICSs on a statutory footing from July 2022, comprising of an Integrated Care Partnership and an Integrated Care Board. Figure 2 Illustrates how the various elements including, health care providers, NHS Trusts and Councils are brought together in Norfolk under the Norfolk and Waveney ICS.

Figure 2: Infographic of Norfolk and Waveney Integrated Care System (ICS)



The Integrated Care Partnership (ICP)

A statutory committee jointly formed between the NHS integrated care board and all upper-tier local authorities that fall within the ICS area. The ICP will bring together a broad alliance of partners concerned with improving the care, health, and wellbeing of the population, with membership determined locally. The ICP is responsible for producing an integrated care strategy on how to meet the health and wellbeing needs of the population in the ICS area.

NHS Norfolk and Waveney Integrated Care Board (ICB)

Is the statutory legal entity which has replaced the CCG. The ICB is a statutory NHS organisation responsible for developing a plan for meeting the health needs of the population, managing the NHS budget, and arranging for the provision of health services in the ICS area. It will bring the local NHS together to improve population health and care.

Place-based Partnerships

Within each ICS, place-based partnerships will lead the detailed design and delivery of integrated services across their localities and neighbourhoods. The partnerships will involve the NHS, local councils, community and voluntary organisations, local residents, people who use services, their carers and representatives and other community partners with a role in supporting the health and wellbeing of the population.

The ICS is committed to taking a place-based approach, and the Integrated Care Board is supported by 5 Place Boards (based on old CCG boundaries), while the Integrated Care Partnership is supported by 8 Health and Wellbeing Partnerships (based on local authority footprints).

Figure 3: The 17 Primary Care Networks (PCNs), and 5 Places Boards



Local Authority Public Health, County Councils

Local authorities in the ICS area are responsible for social care and public health functions as well as other vital services for local people and businesses.

In Norfolk and Suffolk, the Director of Public Health (DPH) and public health workforce is part of Norfolk and Suffolk County Councils respectively. The DPH is responsible for commissioning some mandatory and discretionary health services, for example sexual health, smoking cessation, drug and alcohol treatment, NHS Health Checks, and health improvement services.

Health and Wellbeing Boards

[Health and Wellbeing Boards](#) are statutory bodies introduced in England under the Health and Social Care Act 2012 whose role is to promote integrated working among local providers of healthcare and social care. They bring together local authorities, the NHS, communities, and wider partners to share system leadership across the health and social care system. They have a duty to encourage integrated working between commissioners of services, and between the functions of local government (including planning). Each Health and Wellbeing Board is responsible for producing a Health and Well-being Strategy which is underpinned by a [Joint Strategic Needs Assessment](#), a document that provides local policymakers and commissioners with a profile of the health and wellbeing needs of the local population. This will be a key strategy for a local planning authority to take into account to improve health and well-being.

HEALTH AND SOCIAL CARE PARTNERS:

Many health and social care partners form part of our ICS, not all of which are specifically captured in figure 2. These include, but are not limited to:

- GP practices
- Dental practices
- Pharmacies
- Opticians
- Acute Hospital trusts
- Mental Health providers
- Community Health providers
- Social care
- 111 and out of hours care
- The Ambulance Trust and patient transport.

Local Planning Authorities

Norfolk and Waveney is covered by a number of district, borough and city councils with local planning roles and responsibilities:

- Breckland District Council
- Broadland District Council
- Great Yarmouth Borough Council
- Borough Council of King's Lynn and West Norfolk
- North Norfolk District Council
- Norwich City Council
- South Norfolk Council
- East Suffolk District Council (covers the Waveney area of the Norfolk and Waveney ICS)

The Broads Authority is a statutory body established in 1989 with a duty to manage the Norfolk and Suffolk Broads, it is also a local planning authority and is the sole planning authority in relation to land within the Broads.

Norfolk County Council and Suffolk County Council (for the East Suffolk area) are responsible for determining planning applications related to mineral extraction, waste management facilities and developments by the County Councils. Although planning applications associated with these matters fall outside the scope of this Protocol, the health and wellbeing implications of minerals and waste developments are nevertheless important considerations.

One Public Estate (OPE)

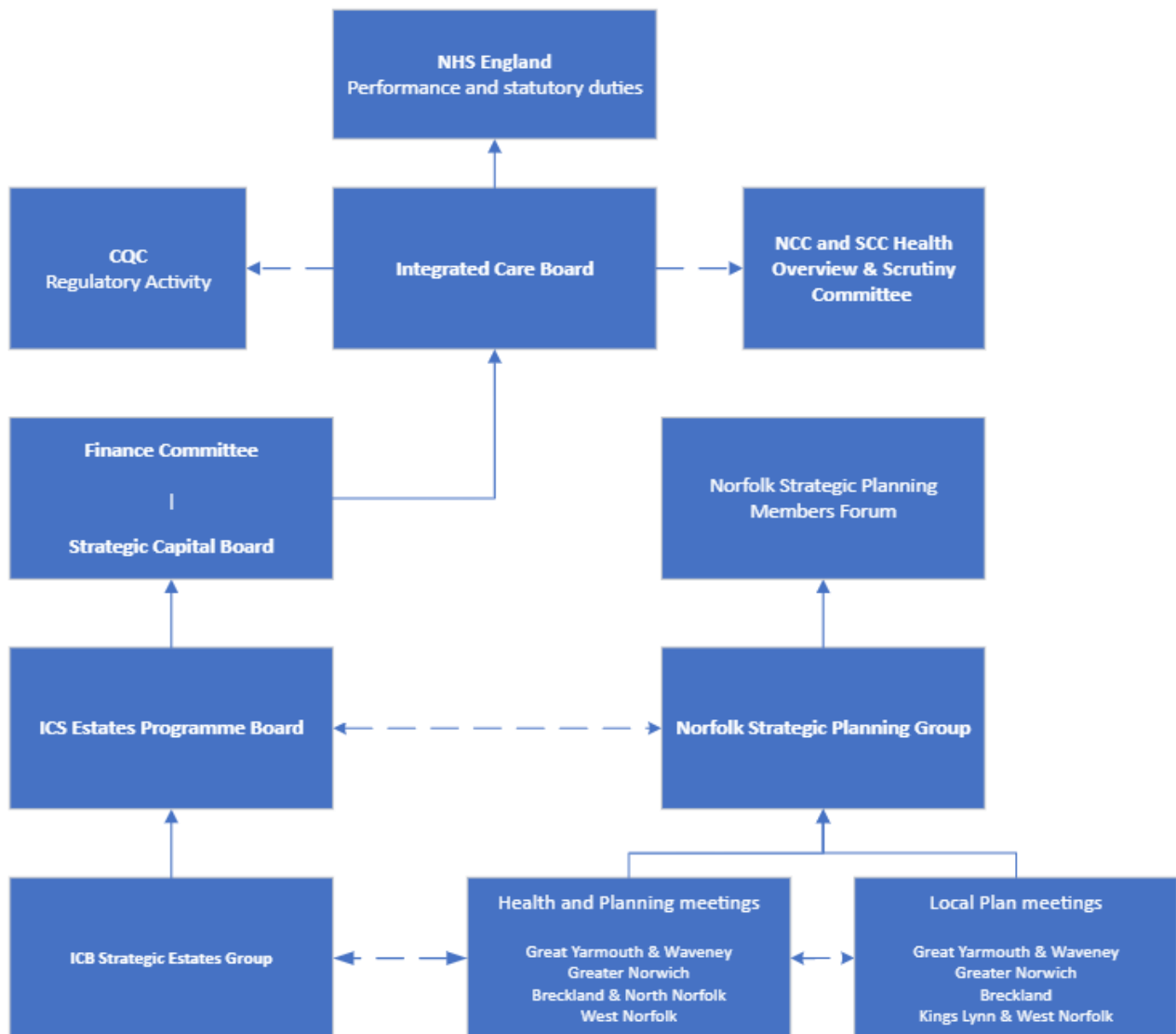
One Public Estate is an established national programme delivered in partnership by the Office of Government Property (OGP) and the Local Government Association (LGA). It provides practical and technical support and funding to councils to deliver ambitious, property-focused programmes in collaboration with central government and other public sector partners. NHS and local authority colleagues will continue to work through the OPE programme to identify and deliver integrated infrastructure solutions that provide additional capacity for the growing demand on our services.

2.4. GOVERNANCE

Collaborative working must continue to underpin the relationships between the ICB and local authorities and the delivery of services to residents. The partnership we have will play a key role in making shared decisions on how to use resources, design services and improve population health.

We will continue to work with local planning authorities and ensure the impacts on health and care services are measured and managed as our population and the requirement for our services continue to grow. The governance structure below illustrates how and where the process behind the protocol is managed.

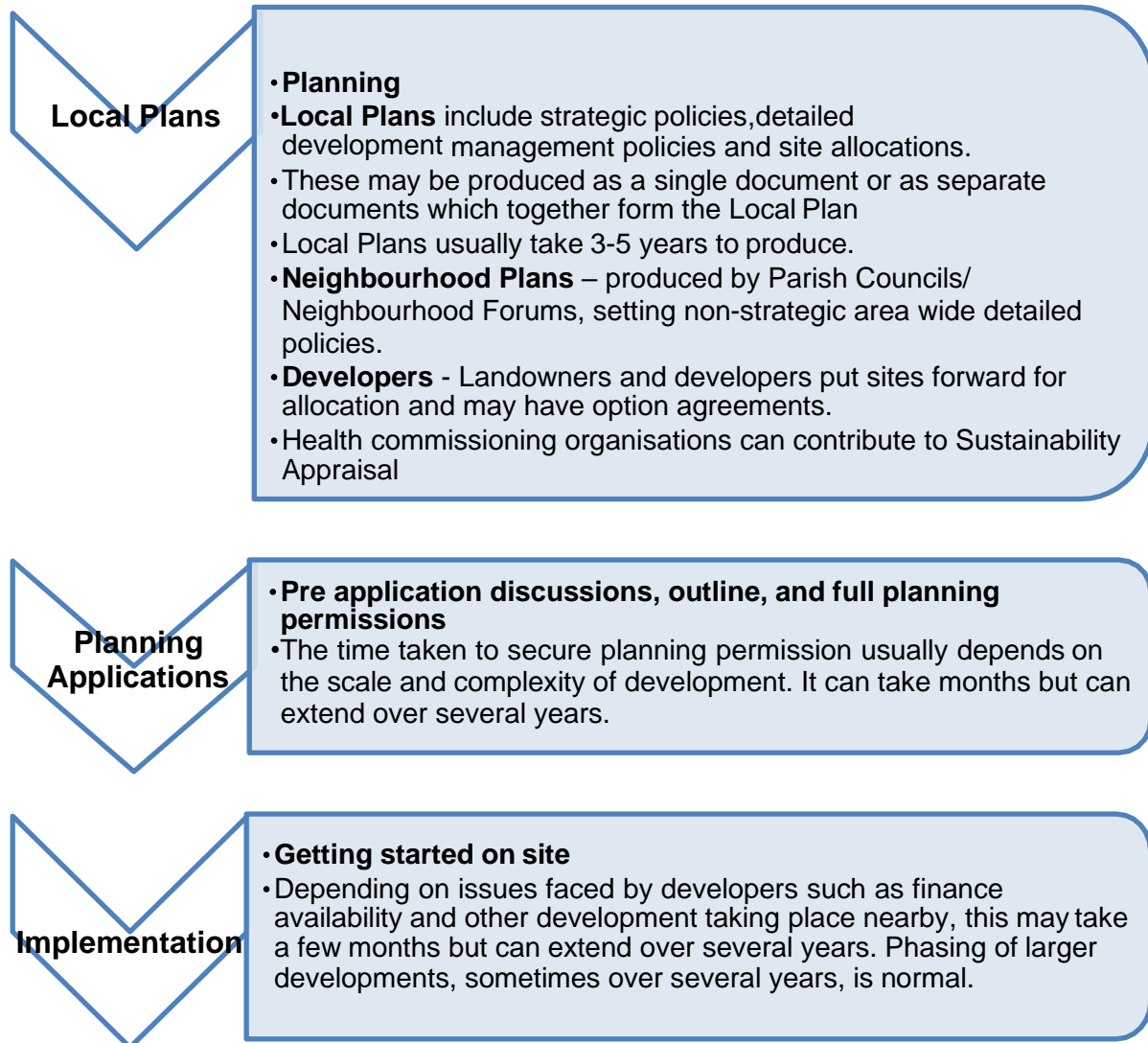
Figure 4: Structure for managing the engagement and working of this protocol.



3. THE PLANNING PROCESS – KEY STAGES

There are three key stages in the town planning process (illustrated in figure 5 below): plan making, planning applications and implementation.

Figure 5: The key planning stages for building development



3.1. PLAN MAKING

The planning process is plan-led and local planning authorities produce Local Plans to set the planning strategy for their area, to be achieved through strategic policies and through site allocations and detailed development management policies. These may be supported by detailed Neighbourhood Plans, with the latter combining with the Local Plan to form the development plan for the local authority area.

These policies are used to assess planning applications. Local Plans include housing targets. The allocation of sites establishes the principle that specific types and scales of development are appropriate in specific locations. This includes allocating sites for housing and mixed-use development to meet housing targets. It also provides healthcare planners and commissioners with the potential to take a long-term strategic approach to allocating sites to meet health infrastructure needs.

Local Plans may be produced as a single document or as a suite of documents. In general, a Local Plan will take three to five years to produce. Local Plans, and Neighbourhood Plans (usually prepared by Parish and/or Town Councils), must take account of guidance in the [National Planning Policy Framework](#) (NPPF). The NPPF sets out the wide-ranging ways in which planning should promote healthy and safe communities (Chapter 8) and requires Local Plans to have strategic policies which aim to achieve healthy, inclusive, and safe places (para.92)

Local Plans are subject to Sustainability Appraisal (SA) to assess the likely economic, social, and environmental effects of policies. Specific questions are generally included about the built and natural environment encouraging healthy lifestyles and providing necessary health service infrastructure. This is an opportunity to ensure LPAs are considering the relative merits of different sites and policies properly against public health related issues. The considerations that go into the Sustainability Appraisal are essential to what follows in the Local Plan and so early engagement in the Sustainability Appraisal process by Public Health and wider health commissioners can make the biggest difference to the resultant local plan.

Increasingly, assessment of the viability of development is important and local planning authorities must ensure that costs resulting from policy requirements would not make development unviable. Therefore, all local plans should contain policies to ensure health issues are considered in new development. Many more recent local plans set a requirement for health impact assessments (HIA) to be undertaken by developers of larger scale housing developments, defined according to [current guidance on HIA use](#) in the planning process. In addition, local planning authorities have a 'duty to align and cooperate' on plan making. This advises them to work with prescribed bodies including ICSs and NHS England, as well as other local authorities, to cooperate on strategic cross boundary matters such as health infrastructure.

3.2. PLANNING APPLICATIONS

Except for limited types of permitted development such as the conversion of offices to housing, planning permission is required for housing development. An application will generally be granted permission if it is in accordance with the local plan, unless there are material considerations that indicate otherwise. The revised 2023 NPPF also enables housing to be developed if there is no demonstrable supply of a five-year land supply for housing or previous three years delivery was 75% or less of the housing requirements of an area. Since there is a substantial cost to making a planning application, most promoters usually only apply if they are reasonably confident of getting consent. If an application is refused there is an appeals process via the Secretary of State, which can be costly for the promoter or developer.

Pre application discussions: Early consultation and liaison on development proposals, although not always a formal requirement, is beneficial in enabling policy requirements to be clearly set out and in resolving potential problems or conflicts before a formal application is submitted. Following any discussions, developers submit either outline or full planning applications.

Outline applications: An application for outline planning permission allows a decision to be made on the general principles of how a site can be developed. Outline planning permission is granted subject to conditions requiring the subsequent approval of one or more detailed 'reserved matters'. On large sites, it is common to secure an outline permission for the whole site and then to apply for reserved matters for specific phases

of development over time.

Full applications: An application for full planning permission results in a decision on the detail of how a site or part of a site can be developed. The planning officer dealing with an application will often negotiate and suggest ways to improve the scheme; but the main part of the job is to make a recommendation to approve or refuse planning consent. An officer may have delegated responsibility to issue consent, but on large schemes that decision is usually taken by a council's Planning Committee. If planning permission is granted (which usually lasts for 3 years), subject to compliance with planning conditions, development can then take place.

3.3.IMPLEMENTATION

The final stage is implementation of a planning permission. The timing of the implementation of schemes granted planning permission, and in some cases whether they are implemented at all, cannot be guaranteed. From the developer's perspective the planning system is only an element of the construction process. Issues may arise that delay implementation. These can be varied, and often relate to market conditions, site costs, access to finance and the availability of construction staff or materials.

4. PROCESS FOR HEALTH COMMISSIONERS ENGAGEMENT IN PLANNING

The process for health commissioners' engagement with the planning process is set out in detail below and is also summarised in Figure 6 at the end of this section.

4.1.PLAN MAKING

The extensive consultation that takes place on plan making provides the most significant opportunity for health partners including the ICS to use their expertise to ensure that Local and Neighbourhood Plans reflect national and local health priorities adequately.

During the preparation of their Local Plans the respective LPAs will need to consult all statutory and other agreed health² and social care consultees and at "Regulation 18 and 19" statutory consultation stages. Each of the groups of organisations will be responsible for responding on their own behalf in a manner which meets the deadlines for the planning process.

To meet NPPF requirements, it is important for relevant health planning and commissioning bodies to ensure that strategic Local Plan policies reflect their own strategic priorities and the available evidence base.

Evidence on likely long term overall growth needs and the consequent strategic health needs will be key. Public Health and local planning authorities in Norfolk and East Suffolk have made available provisional figures, based on demographic modelling, for likely annual and long-term population growth in each area. This evidence assists both Local Plan making authorities and the relevant healthcare commissioning body and ICS to assess future health facilities and workforce needs and to plan accordingly.

This evidence is intentionally "high level" to assist strategic planning. It is provided at the place level and is not intended to be site specific as it is the role of the relevant healthcare

² There will be a single point of contact for NHS / health engagement via the ICS Estates' Group –see below

commissioning body and ICS to determine how best to address the health care needs resulting directly from specific new developments. However, updated data will in the future be publicly available online which will, along with an improved understanding of the implementation of new housing schemes, provide a valuable evidence base to assist healthcare planners and commissioners in planning for health needs in the medium and long term.

The ICS Strategic Estates Infrastructure Development Plan (IDP) has been formed to provide a strategic overview exploring the health infrastructure needs arising from population growth proposed in local plans.

For the purposes of the IDP, infrastructure relates to medical facilities and other health and social care facilities as defined in the Planning Act 2008 as a type of infrastructure that can be funded by the Community Infrastructure Levy (CIL).

Investment in the county's health infrastructure is essential to cope with the proposed scale of growth identified in local plans and the Strategic Health Asset Planning and Evaluation tool (SHAPE) used by the ICB, and Community Infrastructure Levy (CIL) and Section 106 (S106) housing developer contributions can contribute towards and help fund and support the development of new and improved healthcare infrastructure.

In determining which projects CIL or S106 could help fund it is important to recognise that CIL monies can be spent on the provision, improvement, replacement, operation or maintenance of infrastructure, or anything else that is concerned with addressing demands / impacts that a proposed development places on health care in that area. Whereas S106 monies are agreements usually specific to a certain project.

The IDP informs the identification and determination of investment priorities across the Norfolk and Waveney Integrated Care Board (ICB) and its health partners. The IDP will evolve over time to reflect the changing housing landscape across the various local planning authority areas with updates being made on an annual basis.

The IDP contains various information sections covering a sites general information, its current status with regards to capacity, potential or planned development, future status once a project is realised, and the financial information to accompany the project.

In addition to this, health partners will use comprehensive health planning tools which provide detailed information on health estate, travel times to services, clinical indicators such as prevalence, GP workforce data, and mapping future housing trajectories. It may also be possible for health care planners and commissioners to propose specific sites to be allocated for health infrastructure development to meet medium to long term needs.

4.2. PLANNING APPLICATIONS

While Norfolk County Council and Suffolk County Council Public Health are informed of planning applications for larger housing developments (typically 10 or more dwellings or of an area of 1 hectare or greater) as county councils are statutory consultees, other health planning and commissioning bodies are not listed nationally as statutory consultees on such applications. One of the aims of this document therefore is to raise awareness of the importance of local planning authorities in Norfolk and East Suffolk gaining input on housing developments not only from Public Health, but also from relevant health service planning and commissioning bodies. The ICS Strategic Estates Groups role as coordinator between local planning authorities, health partners and the ICS will assist both in ensuring that development is planned to enable healthy lifestyles and allow

service delivery to be planned effectively. Guidance is offered [nationally](#) on some considerations on who to engage.

The ICS Strategic Estates' Group³ will be able to offer a “one stop” approach for planners to engage with the wider health system and garner views on, for example, primary and acute provision, patient needs and direct consultation requests to the ICS. This will not of course preclude individual GP surgeries or other health partners responding on an individual basis.

It is particularly important that Public Health and relevant healthcare planning and commissioning bodies, via the mechanism detailed in this protocol, are consulted on proposals for development aimed at groups in society with distinct health needs such as the elderly and students. The respective LPAs should therefore consult Public Health and health partners on planning applications submitted for housing developments of 50 dwellings or more and for all planning applications including care homes, housing for the elderly, student accommodation and any proposals which would lead to significant loss of public open space. This should include any relevant pre-application discussions. For developments below 50 dwellings which may have an impact upon health services then the ICS Strategic Estates Group should also be contacted for an initial view. Discussions and comments provided on all planning applications will make use of the criteria set out in the Health and Wellbeing Checklist (Appendix 1). Planning officers should make developers aware of this checklist and the benefits of taking account of it in working up housing proposals.

PRE-APPLICATION DISCUSSIONS

Since pre-application discussions are held for most of the larger scale proposals, Public Health and the ICS Strategic Estates Group will be engaged with and comments sought on pre-application proposals in Norfolk for all housing developments of 50 dwellings or more⁴, for those including care homes, housing for the elderly, student accommodation and for proposals which would lead to significant loss of public open space. Public Health and health partners may adjust this threshold of 50 dwellings in the future in consultation with the local authority planners. However, during this review (2023) it was still felt to be a suitable threshold.

Active consideration of other developments related to, for example transport and minerals and waste, were considered to be included within the scope of the protocol. However, it was felt that there are existing structures, processes and legislation which cover these types of development.

Some LPAs within Norfolk and East Suffolk are introducing requirements for HIAs to be produced for larger developments and all partners are encouraged to consider broader use of HIAs or similar tools to understand broader health, wellbeing and prevention opportunities afforded by development and to minimise unforeseen circumstances. To this end colleagues have been approached by the Town and Country Planning Association (TCPA) with an offer to provide support to work with all signatories to the protocol about how it may best be supported to work across Norfolk and East Suffolk.

³ This group has oversight of NHS buildings and other estate and will be able to access tools to map and plan for future growth with a specific health perspective. From 2018 it has agreement to act as a conduit for cross-county NHS service engagement

⁴ See the comment above about developments below 50 dwellings which may require an initial view from the ICS Estates' Group

Pending revised tools and guidance the current Appendix 1 is to be retained to help support existing plan making and development requirements to build wider determinants of health into the planning process.

Engagement in pre-application discussions will, in many cases, be the most important stage of involvement in the planning application process as it enables Health and Social care partners and Public Health to influence the design principles of development at its earliest stage.

OUTLINE PLANNING APPLICATIONS

Consultations on outline applications provide an excellent opportunity for health partners and Public Health to comment on emerging development proposals, influencing the eventual development form and identifying whether additional health facilities may be required to serve the community. Adding to the information gained through the Local Plan site allocation process, outline applications enable health and Public Health to gain further knowledge of the scale and likely timescale for delivery of housing. They also provide an additional opportunity for NHS consultees and public health to influence the form of a development before detailed proposals are submitted. Only a proportion of major housing applications, usually the larger scale and more complex proposals, will include an outline phase.

It is at this stage that the ICS Strategic Estates Group will have the detail and the opportunity to model the proposed development through the HUDU tool and provide details within the written response from the outputs of the modelling.

HUDU TOOL

The HUDU model was developed by the Healthy Urban Development Unit in London, it is a nationally recognised modelling system and is licensed by HUDU for use within the NHS. It is a comprehensive tool for assessing and forecasting the additional health service requirements and cost implications of new residential developments.

It is a transparent and standardised approach to calculate developer contributions required to mitigate the impact housing developments have on healthcare. This is in the form of capital costs for schemes such as new build facilities, extensions, reconfigurations, or refurbishments. Revenue costs are not requested as part of the modelling.

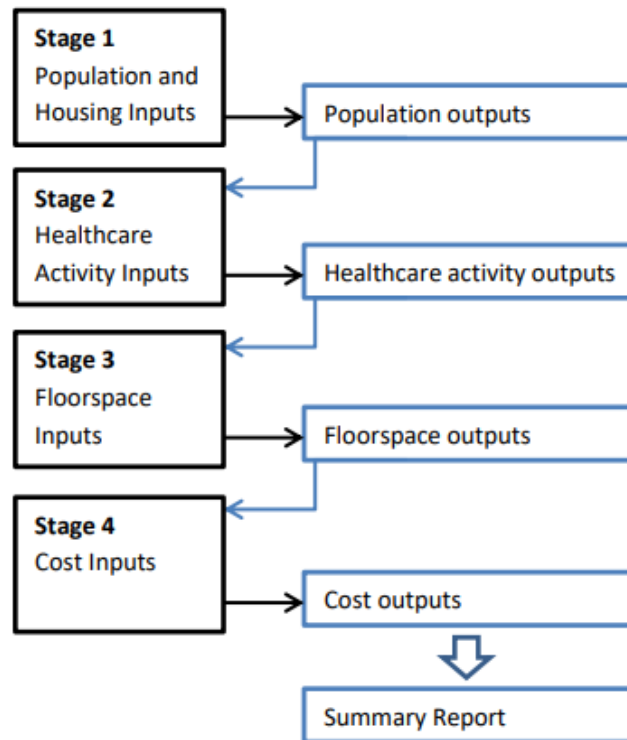
The model uses a range of assumptions based on the most up to date information available. However, users can manually adjust or input new assumptions where data exists, such as population figures for the county and health related information.

Outputs from the modelling provide information on:

- The net increase in population resulting from the specific housing development in question
- Primary healthcare needs (GP and community health facilities)
- Acute beds and floor space requirements
- Mental healthcare beds and floor space requirements
- Intermediate Healthcare beds and floorspace requirements
- Capital cost impacts (per provision type)

How HUDU works:

The HUDU model uses a step-by-step approach whereby the user progresses through the screens and calculations in sequence, with outputs generated at the end of each stage.



Data sources and metrics used within HUDU, along with an example summary report that captures the four output areas shown above and highlights the impact of population growth from a specific development can be found at Appendix 3.

FULL PLANNING APPLICATIONS

Consultation on a full planning application is the final opportunity for health partners and Public Health to influence development proposals. As this is late in the planning process, there will be limited scope for change, highlighting the importance of consultation on outline planning applications. The relevant health authorities, and Public Health will, if deemed appropriate, provide a written response to a consultation from a planning officer within 21 days of the consultation subject to negotiated extension time. This period includes an opportunity for communication between health and social care partners, Public Health, United Kingdom Health Security Agency, NHS England Area Team and NHS Estates if required, and the ICS, on the initial results of modelled output. The criteria set out in the Health and Wellbeing checklist (see Appendix 1) will be used as the basis of detailed comments.

The written response from health and Public Health will be reported in the planning officer's report. Where health partners and Public Health have provided a written response to a planning application case officer, they should receive in writing notification of the planning decision including any relevant conditions attached to the planning decision. Legislation and national planning policy requires ongoing engagement between local planning authorities.

4.3. IMPLEMENTATION

Where developer funding is considered appropriate towards health provision associated with new residential development and is in line with the [Community Infrastructure Levy Regulations \(2010 as amended\)](#), this will normally be secured either through Planning Obligations; and/or Community Infrastructure Levy funds. Local Authorities will need to record any such funding arrangements in their annual Infrastructure Funding Statements (IFS).

Since the timing of the implementation of schemes granted planning permission cannot be guaranteed, it is especially important that both Public Health and health commissioners have access to the best available information on delivery that the LPA can provide. In most cases, the main source of information will be the Annual Monitoring Report (AMR) produced by each local planning authority, usually at the end of the calendar year. The appropriate mechanism should be in place for each AMR to be shared by the LPA with the ICS. It is suggested that there will be an annual meeting between partners to this protocol to consider the data within the AMR and review how well the protocol is working.

There are several existing meetings at different geographical levels which include planners, NHS colleagues and Public Health. The protocol will not prescribe the form and function of these but recommends a range of engagement processes to meet a wide range of information and consultation needs.

4.4. CONTACT DETAILS FOR PROTOCOL USE

NHS ICS Estates:	nwicb.icsestates@nhs.net
Norfolk County Council Public Health:	phplanning@norfolk.gov.uk
Suffolk County Council Public Health:	phplanning@suffolk.gov.uk

Figure 6: Summary Table – The Involvement of Health and Norfolk Public Health in the Planning Process

1. Plan making	
<p>Extensive consultation over a significant period provides the opportunity for Health and Social Care partners and Public Health to ensure that Local Plans reflect national and local health strategies and priorities and address infrastructure needs;</p> <p>Health partners and Public Health to take account of Local Development Schemes and ensure evidence is available for consideration by plan makers.</p>	
2. Planning applications	
<p>Health and Social care partners and Public Health to be consulted on all planning applications for housing developments of 50 dwellings or more, and for care homes, housing for the elderly, student accommodation and loss of open space.</p> <p>LPAs will also consult on those sites less than 50 dwellings where there is likely to be cumulative impact (exceeding 50 dwellings) when considered with other contiguous application/s or applications close by.</p> <p>Health partners and Public Health comments to focus on ensuring development will enable healthy lifestyles and allow service delivery to be planned effectively.</p>	
Pre-application discussions	Health partners and Public Health will attend meetings as appropriate and provide comments on all pre-application proposals consulted on, when resources allow.
	Where HIAs are required, discussions should include its scope and nature.
Outline planning applications	Health partners and Public Health will provide comments on all pre-application proposals they are consulted on; usually only large complex proposals are included in outline phase.
	Enables health partners and Public Health to enhance their intelligence on the scale and time frame for housing developments and to influence the form of development.
Full planning applications	Final opportunity for health partners and Public Health to influence development proposals.
	Through the appropriate mechanism, health partners and Public Health will provide a written response within 21 days of receipt of the request, in consultation with relevant commissioning health bodies, subject to negotiated extension time. Response will be reported in the planning officer's report.
3. Implementation	
<p>Health partners and Public Health provided with best available information on implementation from the LPAs through their published AMRs and attendance at bi-annual Local Plan meetings with the respective LPAs.</p>	
4. Accountability	
<p>Public Health will report to the Health and Wellbeing Board annually, on a 'need to know basis'.</p>	

5. CONCLUSION

It is widely acknowledged that the environment in which we are born, grow, live, work and play (Marmot, 2010) is a major determinant of our health and wellbeing. Housing quality, air pollution, road infrastructure, access to green space and walk- ability of our neighbourhoods, along with many other social and environmental factors, contribute directly to our health and wellbeing and can impact on our ability to live healthy lifestyles. The ability to access appropriate health services when we need them is also a key requirement for our health and wellbeing.

This is recognised by the National Planning Policy Framework which sets out wide ranging ways in which local planning authorities together with their public health and health service colleagues can contribute to maintaining the health promoting environment.

This paper outlines a documented process that will help to ensure that local planning authorities can work effectively with their Public Health and health service colleagues to ensure the recommendations within the National Planning Policy Framework are carried forward and that the principles of promoting health and wellbeing through the local planning system are implemented across Norfolk.

The collaboration between the Norfolk and Waveney ICS, Public Health, and local planning authorities in following this documented process provides an opportunity to share expertise between the sectors and to support the healthy growth across the communities of Norfolk and East Suffolk. Through the use of the health care requirements modelling tool, it will also assist in the long-term strategic planning of health service infrastructure.

Appendix 1 A Healthy planning checklist for Norfolk and East Suffolk

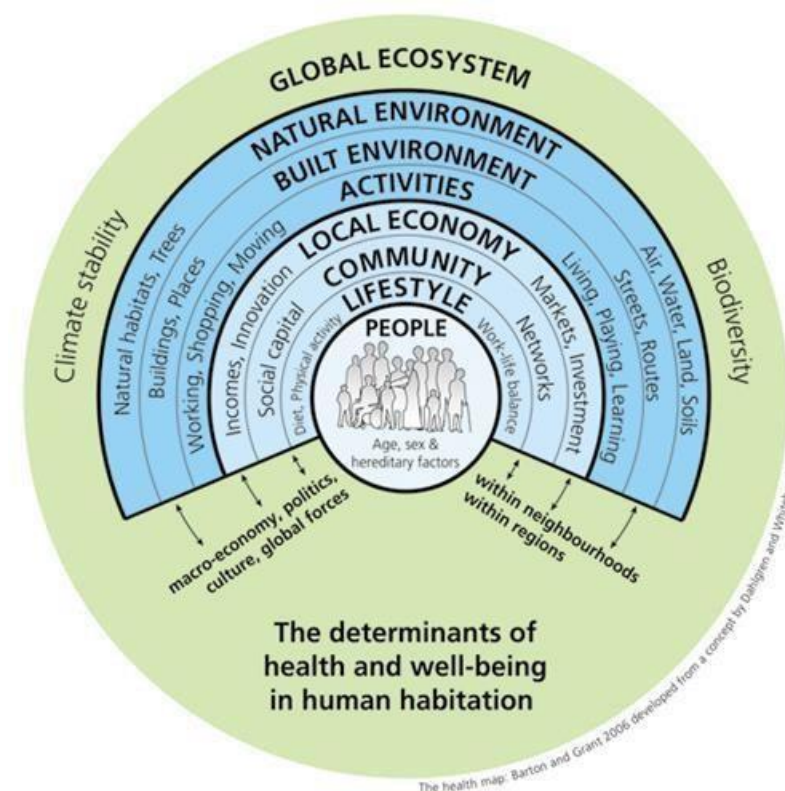
A HEALTHY PLANNING CHECKLIST FOR NORFOLK

The links between planning and health are long established. The Health Map⁵ shows how lifestyle factors are nested within the wider social, economic, and environmental determinants of health which are, in turn influenced by the built and natural environments in which we live. We know that developments that are carefully planned for and managed may contribute positively to the health and well-being of a community. National Planning Policy Guidance requires local planning authorities to ensure that health and well-being, and health infrastructure are considered in local, and neighbourhood plans and in planning decision making.

The Healthy Planning Checklist for Norfolk has been developed to facilitate joint working to improve health. It is based upon the London Healthy Urban Development Unit (HUDU) Rapid Health Impact Assessment Toolkit¹ and the Royal Town Planning Institute (RTPI) Principles for Healthy Communities¹. The Checklist is intended to provide a practical tool to assist developers and their agents when preparing development proposals and local planning authorities in policy making and in the application process. It also provides a framework for Norfolk County Council Public Health when considering health and wellbeing impacts of development plans and planning applications.

The checklist is structured around six healthy planning themes:

- Partnership and inclusion
- Healthy environment
- Vibrant neighbourhoods
- Active lifestyles
- Healthy housing and
- Economic activity



⁵ Barton H and Grant M (2006) **A health map for the local human habitat** The Journal of the Royal Society for the Promotion of Health November 2006 126: 252-253,

The checklist is designed to highlight issues and facilitate discussion and can be used flexibly, reflecting the size and significance of the development. It is best used prospectively, before a plan or proposal is submitted, but can also be used concurrently and retrospectively. Used prospectively it can help assess plans and proposals and inform the design and layout of a development and influence those factors that can impact on the health and wellbeing of residents and the wider communities of Norfolk.

Consideration should be given to each of the six healthy planning themes. It is acknowledged that there will be crossover with other assessments, including environmental impact and transport assessment, and an integrated approach is encouraged.

HEALTHY PLANNING CHECKLIST				
	Criteria to consider	Comments and recommendations	Policy requirements, standards, and evidence	Why is it important?
THEME 1	PARTNERSHIP AND INCLUSION			
Engagement	<p>Health and planning are integrated at an early stage of plan making and proposal preparation.</p> <p>Communities, including vulnerable and hard to reach groups have been engaged in the development of plans and policies.</p>		<p>Planning Policy Guidance, who are the main health organisations a local authority should contact and why?</p>	<p>Community engagement before and during construction can help alleviate fears and concerns.</p>
Integration	<p>The design creates environments where people can meet and interact and connects the proposal with neighbouring communities.</p>		<p>National Planning Policy Framework Chapter 8. National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>Healthy and safe communities - GOV.UK (www.gov.uk)</p> <p>National Design Guide – Chapter U3 (social inclusivity)</p>	<p>Creating a sense of community is important to individual's health and wellbeing and can reduce feelings of isolation and fear of crime.</p> <p>Planning can support communities and improve quality of life for individuals by creating environments with opportunities for social networks and friendships to develop.</p>

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THEME 2	HEALTHY ENVIRONMENT			
Construction	The plan or proposal minimises construction impacts such as dust, noise, vibration, and odours.		<p>National Planning Policy Framework Chapter 15 and e.g. paragraph 174(e)</p> <p>National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>National Design Guide – Chapters R1, R2, R3 (Resources)</p>	Construction activity can cause disturbance and stress which can have an adverse effect on physical and mental health. Mechanisms should be put in place to control hours of construction, vehicle movements and pollution.
Air quality	The plan or proposal minimises air pollution.			The long-term impact of poor air quality has been linked to life-shortening lung and heart conditions, cancer, and diabetes.
Noise	The plan or proposal minimises the impact of noise caused by traffic and commercial uses through attenuation, insulation, site layout and landscaping.			Reducing noise pollution helps improve the quality of urban life.
Sustainable energy and materials	The plan or proposal maximises opportunities for renewable energy sources and promotes the use of sustainable materials.			Access to nature and biodiversity can have a positive impact on mental health and wellbeing.
Biodiversity	The plan or proposal contributes to nature conservation and biodiversity.			New development can improve existing, or create new, habitats or use design solutions (green roofs, living walls) to enhance biodiversity.

Local food growing	The plan or proposal provides opportunities for food growing, for example by providing allotments, private and community gardens.			Providing space for local food growing helps promote more active lifestyles, better diets, and social benefits.
Flood risk	The plan or proposal reduces surface water flood risk through sustainable urban drainage techniques, including storing rainwater, use of permeable surfaces and green roofs.			Flooding can result in risks to physical and mental health. The stress of being flooded and cleaning up can have a significant impact on mental health and wellbeing.
Overheating	The design of buildings and spaces avoids internal and external overheating, through use of passive cooling techniques and urban greening.			<p>Climate change with higher average summer temperatures is likely to intensify the urban heat island effect and result in discomfort and excess summer deaths amongst vulnerable people.</p> <p>Urban greening - tree planting, green roofs and walls and soft landscaping can help prevent summer overheating.</p>

THEME 3		VIBRANT NEIGHBOURHOODS		
Social infrastructure	The plan or proposal contributes new social infrastructure provision that is accessible, affordable, and timely.		<p>Planning Policy Guidance. How should health and well-being and health infrastructure be considered in planning decision making?</p> <p>National Planning Policy Framework paragraph 20,92c, 93 National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>Healthy and safe communities - GOV.UK (www.gov.uk)</p>	<p>Future social infrastructure requirements are set out in the local authority infrastructure plans and developments may be expected to contribute towards additional services and facilities.</p>
Access to fresh food	<p>The plan or proposal promotes access to a range of community facilities and public services (such as health, education, and cultural infrastructure) that are well designed and easily accessible.</p> <p>The plan or proposal provides opportunities for local food shops and avoids an over concentration or clustering of hot food takeaways.</p>		<p>Planning Policy Guidance, what is a healthy community? How can planning create a healthier food environment?</p> <p>Healthy and safe communities - GOV.UK (www.gov.uk)</p> <p>National Design Guide Chapter U1 (mix of uses)</p>	<p>Good access to local services is a key element of a lifetime neighbourhood and additional services will be required to support new development.</p> <p>A proliferation of hot food takeaways and other outlets selling fast food can harm the vitality and viability of local centres and undermine good dietary behaviour</p>

THEME 4	ACTIVE LIFESTYLES			
<p>Access</p> <p>Page 155</p>	<p>The plan or proposal protects and enhances existing and/or provides suitable new accessible green and open space, play and sports spaces, woodlands, and allotments (or provides alternative facilities in the vicinity). It sets out how these new spaces will be managed and maintained for the lifetime of the development.</p>		<p>National Planning Policy Framework Chapter 8 Promoting healthy and safe communities National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>National Planning Policy Framework Chapter 9 Promoting sustainable transport National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>Helping to create 'active environments'. Active Design Guidance</p> <p>Safe, sustainable development aims and guidance notes for local Highway Authority requirements in Development Management, Norfolk County Council. Highway Guidance for Development</p>	<p>Access to open space and community facilities has a positive impact on health and wellbeing. Living close to areas of green space, parks, woodland, and other open space can improve physical and mental health regardless of social background.</p>

<p>Travel and transport</p> <p>Page 156</p>	<p>The plan or proposal has a travel plan that includes adequate and appropriate cycle parking and storage and traffic management and calming measures.</p> <p>The layout is highly permeable and includes safe, well-lit, and networked pedestrian and cycle routes and crossings.</p> <p>The plan or proposal minimises travel to ensure people can access facilities they need by walking cycling and public transport.</p> <p>The plan or proposal keeps commercial vehicles away from areas where their presence would result in danger or unacceptable disruption to the highway or cause irreparable damage.</p>		<p>National Design Guide Chapters M1, M2 & M3 (movement)</p>	<p>A travel plan can promote sustainable transport and address the environmental and health impacts of a development.</p> <p>Cycle parking and storage in residential dwellings can encourage cycle participation. Traffic management and calming measures and safe crossings can reduce road accidents involving cyclists and pedestrians and increase active travel.</p> <p>Developments should prioritise the access needs of cyclists and pedestrians.</p> <p>Developments should be accessible by public transport.</p>
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THEME 5		HEALTHY HOUSING		
<p>Accessible housing</p> <p>Page 157</p>	<p>The plan or proposal meets all the requirements contained in National Housing standards for daylighting, sound insulation, and private space.</p> <p>The plan or proposal provides accessible homes for older or disabled people.</p>		<p>National Planning Policy Framework Chapter 12 Achieving well-designed places</p> <p>National Planning Policy Framework - GOV.UK (www.gov.uk)</p> <p>National Design Guide Chapters H1, H2, H3, L2, & U2</p>	<p>Good daylighting can improve the quality of life and reduce the need for energy to light the home.</p> <p>Improved sound insulation can reduce noise disturbance and complaints from neighbours. The provision of an inclusive outdoor space which is at least partially private can improve the quality of life.</p> <p>Accessible and easily adaptable homes can meet the changing needs of current and future occupants.</p>
	<p>Healthy living</p> <p>The plan or proposal provides dwellings with adequate internal space, including sufficient storage space and separate kitchen and living spaces.</p> <p>Practical use for garden space is provided and where garden space is impractical effectively managed communal garden space will be provided.</p> <p>The plan or proposal encourages the use of stairs by ensuring that they are well located, attractive and welcoming.</p>			<p>Sufficient space is needed to allow for the preparation and consumption of food away from the living room to avoid the 'TV dinner' effect.</p> <p>Rather than having lifts at the front and staircases at the back of buildings hidden from view, it is preferable to have them located at the front to encourage people including those that can use them.</p>

Housing mix and affordability	Neighbourhoods are designed with a mix of housing types and tenures and provide accommodation, which is adaptable to cater for changing needs, including the ageing population.			The provision of affordable housing can create mixed and socially inclusive communities. The provision of affordable family sized homes can have a positive impact on the physical and mental health of those living in overcrowded, unsuitable, or temporary accommodation.
	Affordable housing is integrated in the whole site and will avoid segregation.			Both affordable and private housing should be designed to a high standard ('tenure blind').

THEME 6	ECONOMIC ACTIVITY			
Local employment and healthy workspaces	<p>A range of employment opportunities are available within the neighbourhood or is accessible by sustainable travel means.</p> <p>The plan or proposal includes commercial uses and provides opportunities for local employment and training, including temporary construction and permanent 'end-use' jobs.</p>		<p>National Planning Policy Framework Chapter 6 Building a strong, competitive economy</p> <p>National Planning Policy Framework - GOV.UK (www.gov.uk)</p>	<p>Unemployment generally leads to poverty, illness, and a reduction in personal and social esteem. Employment can aid recovery from physical and mental illnesses.</p> <p>Creating healthier workplaces can reduce ill health and employee sickness absence.</p>

Appendix 2 Homes England – Fact Sheet 4: New homes and healthcare facilities

This fact sheet from Home England helps highlight how new homes affect demand on GPs, what other factors influence demand for local healthcare services, the links between the quality of homes and health outcomes, and how the impact of new homes on local healthcare facilities is considered.



Fact_sheet_4._New_
homes_and_healthc

Appendix 3 HUDU Data Sources and Example Summary Report

This appendix highlights the data sources used in the HUDU modelling tool and provides an example summary report based on a 600-dwelling development.

In this example, we highlight the 600-dwelling development would result in

- a net population growth of 1,055 residents
- a need for 3.88 beds across acute, mental health and intermediate care
- a need for a further 1.11 clinical rooms in primary care
- a need for 289.62 square metres of additional floorspace across all healthcare services
- a capital investment of £2.6m to provide this additional floorspace (*note: this example is based on new build costs*)



Appendix 3 -
HUDU_Summary_Re

Appendix 4 Demand and Capacity Metrics

The HUDU tool, the stages within, and how we use the model to calculate the impacts from specific housing developments, on healthcare services, is covered within the protocol and additional detail on the data sources used can be found at Appendix 3. However, as well as understanding the future impacts from a specific development, we also need to understand the existing demand and capacity across these services. There is a number of defined metrics used in order to achieve this and highlight what appropriate levels of capacity look like; these are.

- Patients (weighted) per GP (including GPs in training) – **1,800**.
- Patients (weighted) per metres squared (GP estate) – first **6,000** patients require **500m²**, every **6,000** patients thereafter require **250m²**.
- *Patients per Dentist (as well as other primary care services) – currently being established.*
- Inpatient bed occupancy rates – **85%**. (anything over this and resilience, safety and efficiency are all at risk = additional capacity required)

To improve transparency during planning consultations, the ICB will include tables such as the below in its written responses. This will highlight the existing demand and capacity within local healthcare settings, plus the additional demand from the development being consulted upon. We will also indicate any projects planned to rectify any areas of constraint and provide the additional capacity required.

Primary Care Workforce	Registered Patients (weighted)	Patients per GP (weighted)	Additional Patients (weighted)	Future patients per GP (weighted)
General Practice 1	18,000	1,636 (11)	1,350	1,759
General Practice 2	12,000	2,000 (6)	1,255	2,209
<i>Dental Practice 1</i>				

Primary Care Buildings	Current NIA (m2)	NIA required for registered patients (weighted)	Current NIA Surplus/Deficit (m2)	Additional NIA required (m2)	Future NIA Surplus/Deficit (m2) (without mitigation)
General Practice 1	1,200	1,000	200	100	100
General Practice 2	500	750	-250	25	-275
<i>Dental Practice 1</i>					

Hospital Buildings	Latest Bed Occupancy Rate	Additional Bed Demand
Acute Hospital X	95%	2.11
Community Hospital Y	98%	0.06
Mental Health Hospital Z	86%	1.53