Business & Property Committee

Report title:	Rural Development Update			
Date of meeting:	6 November 2018			
Responsible Chief Officer:	Tom McCabe – Executive Director, Community and Environmental Services			

Strategic impact

The Economic Development team contributes directly to the delivery of the new Norfolk and Suffolk Economic Strategy, as well as the County Council's corporate objectives. Rural Strategy and rural funding programmes are a key part of the team's remit.

Executive summary

This report provides an update on rural economic development, the key funding programmes managed or brokered by Norfolk County Council, and an overview of key current strategic developments and initiatives with implications for rural businesses and communities in Norfolk.

This paper considers -

- The Norfolk Rural Strategy Steering Group, coordinated by Economic Development and its value as a lobbying and influencing vehicle and in providing strategic support for funding bids and other rural initiatives.
- The Agriculture Bill and other Government consultations on agriculture and the environment, showing how we work with the Rural Strategy Steering Group and other stakeholders to respond with a 'Norfolk' voice to proposals.
- Our rural funding programmes, and the impact they have on rural businesses and communities, showing the considerable success of these programmes in supporting economic growth and employability.
- Post- Brexit funding possibilities and concerns around the funding gap emerging between current and future programmes and work being done to raise these concerns in Government.

Key points

- The Norfolk Rural Strategy Steering Group, a private sector-led partnership coordinated by NCC, has developed a strong track record since 2013 in leveraging funding, lobbying on rural issues and holding key consultation and influencing events.
- The Government published a consultation on the future of food and farming in spring 2018, followed by the Agriculture Bill this September. The key direction of proposed legislation is to phase out direct payments to farmers and to focus future investment onto the delivery of 'public goods' connected with the environment and high welfare standards. The Rural Strategy Steering Group in collaboration with Norfolk County Council, has been coordinating the 'Norfolk response' to these proposals.
- The Economic Development department has a long track record of delivering programmes of support to rural businesses and communities. Current programmes include the LEADER programme for rural businesses, the LIFT Programme for employability and skills, and involvement in the Agritech

programme and Rural Growth Programme. All programmes are delivering well and achieving excellent results. However, there is a worrying gap between the end of current EU-funded programmes in 2019 and the likely start of future programmes in 2021, and Members are asked to endorse an approach to Defra to address this gap with transition funding.

Recommendations:

Members are requested to:

- i. Agree the approach outlined in the document for collaborative working and influencing to support rural businesses and communities.
- ii. Support the approach outlined to respond to relevant Government consultations in collaboration with the Rural Strategy Steering Group.
- iii. Endorse our approach to lobbying for transition and future funding

1. Overview of Rural Development activity in Norfolk County Council

1.1 The Economic Development team at Norfolk County Council has a long track record of delivering rural projects and funding schemes, including a Landskills grant programme and our LEADER programmes supporting rural businesses.

In 2013, Norfolk County Council was instrumental in setting up the Norfolk Rural Strategy Steering Group, a partnership across private, public and voluntary sectors to promote and assist inclusive economic and business growth in rural Norfolk. The partnership commissioned a Rural Strategy for Norfolk, supported by Norfolk County Council, which identified key challenges and opportunities for our rural economy and communities.

The Steering Group includes members from the NFU, CLA, Broads Authority, LEADER Local Action Groups, Easton and Otley College, as well as key consultants and rural specialists, alongside member representation from NCC, currently Cllr Tom Garrod.

The 2013-2020 Norfolk Rural Strategy enabled us to leverage -

£9m for LEADER Local Action Groups to support rural businesses.

A unique £1.4m skills and employability grant scheme for rural Norfolk and North Suffolk, funded by the European Social Fund, and delivered through the LEADER Local Action Groups, the LIFT Programme.

The Rural Strategy has also provided the catalyst for key influencing projects, including –

A major 2015 Conference on the 'silver pound' and the opportunities it presents for rural businesses and entrepreneurs. Followed by a presentation to Norfolk MPs on this subject.

A workshop on Community Land Trusts and the potential they offer to deliver affordable homes in rural areas.

In both of these latter projects, the role taken by the Rural Strategy Steering Group was to bring together key stakeholders to influence and promote new developments.

1.2 Recognising that there had been some fundamental shifts in the economy and Government policy affecting rural areas, the Steering Group decided to commission a refresh of the Rural Strategy in 2017, as always envisaged. Launched by Cllr Cliff Jordan and the Rural Strategy Chair, Clarke Willis, in front of an audience of rural stakeholders in November 2017, the new Strategy is entitled Strong Roots: New Growth, Norfolk Rural Strategy 2017-2020.

It has been developed by the steering group to respond to the opportunities and challenges facing rural Norfolk, and is the result of an extensive consultation exercise. An executive summary of the main recommendations in the strategy is also available. The strategy is supported by case studies which demonstrate the positive impact of rural business funding generated from the last strategy.

The key priorities identified in the Strategy are

- Vision and lobbying for support ensuring that rural issues are embedded in decision-making at every level
- World class environment making Norfolk an outstanding place to live, work and visit
- Technology driven embracing technology-led growth in the rural economy
- Agri-food competitiveness adding value in the supply chain and promoting competitive agriculture
- **Enablers of growth** promoting rural infrastructure improvements which unlock growth
- 1.3 This paper explores in more detail some of the live strands of activity currently being delivered by the Rural Strategy Steering Group in support of the above priorities. These are –

1.3.1 Vision and Lobbying for Support –

- Held a stakeholder consultation on 23 April, with presentations on the Government's major consultation on the future of food and farming, resulting in a joint response from Norfolk County Council and the Rural Strategy Steering Group to the consultation.
- Collating a further joint response to the Agriculture Bill published in September 2018.

The value of this joint lobbying is to enable us to present a 'Norfolk response' with the additional credibility of involving a wide range of stakeholders alongside Norfolk County Council.

1.3.2 World Class Environment –

 Holding a major event on 12 December 2018, hosted by Cllr Andrew Proctor and Rural Strategy Chair Clarke Willis, on Norfolk's aspiration for a 'world class environment'. The event is intended to bring together a new partnership to develop a local 25-year Environment Plan.

1.3.3 Enablers of Growth -

- Rural Strategy Steering Group members Martin Collison (Collison & Associates) and Ben Underwood (CLA) are involved in Water Resources East and linked initiatives to improve strategic planning of water management in Norfolk.
- Rural Strategy Steering Group member, Cllr Tom Garrod is actively promoting the needs of rural areas for great digital connectivity through a range of NCC project work.

2. Evidence – National Policy and implications for Rural Development

2.1 Health and Harmony: the future for food, farming and the environment in a Green Brexit

In spring 2018, Defra issued a consultation entitled 'Health and Harmony: the future for food, farming and the environment in a Green Brexit' which made some proposals on the future funding of food and farming and asked for detailed responses to a range of questions on how future arrangements might work.

The overarching policy direction proposed in the consultation was the principle of replacing basic payments to farmers with the new principle of payment for 'public goods', ranging from high animal welfare standards to measures to improve biodiversity. The consultation asked for feedback on which 'public goods' to prioritise.

Norfolk County Council and the Rural Strategy Steering Group held a consultation event with a wide range of stakeholders, and including involvement from Norfolk County Farms, to develop a response to the consultation. Members will note that a separate report from County Farms focusing specifically on the implications of the future approach for tenant farmers features elsewhere on the agenda for this meeting.

A detailed response (see link under Norfolk Rural Strategy in the Background section) was submitted to the many questions posed in the consultation, also factoring in some specific concerns raised by Norfolk County Farms on behalf of its members as well. Topics covered included the detail of phasing out basic payments to farmers, future priorities for research and development and priorities for 'public goods' to be supported with funding. A headline response was also submitted with several key themes our consultees felt strongly they wished to emphasis to Defra as priorities.

The following were the key headline points argued in the Norfolk response, asking Defra to ensure that future policy and legislation delivers on:

2.1.1 An integrated policy for food – a robust policy for agriculture and trade and a coherent vision for the quality and value of the food we buy. A level playing field for UK food producers, protecting them from subsidised imports from Europe and elsewhere, is essential to preserve and improve industry competitiveness alongside high environmental and welfare standards. Norfolk is at the leading edge of agricultural innovation nationally – Norfolk's food producers are keen to compete internationally in the context of trade conditions

which enable their businesses to flourish in the global marketplace.

The Norfolk response explored the need to determine future agriculture policy alongside future trade policy to ensure Norfolk farmers and food producers are not disadvantaged in the global marketplace.

2.1.2 **Local solutions to local challenges** – ensuring value for money and economic impact through local decision making for future grants.

The Norfolk response made the case that our high level of success delivering outstanding projects through <u>LEADER</u> and the Rural Growth Programme shows the impact that locally determined and focused support can have on the rural economy. Vesting decision-making locally enables us to focus support on businesses and in communities where need and potential are greatest. Rural growth projects present outstanding value for money, with far reaching impact on local employment, supply chains and the visitor economy.

2.1.3 A wide-ranging programme of rural investment – investing in growth projects across the full range of rural businesses, and in rural communities and skills.

The Norfolk response explored the range of business growth initiatives funded by current programmes and made the case for this type of direct investment into rural businesses to continue. It also made the case for continued investment in locally determined projects which support rural employability and skills or invest in rural community services.

2.1.4 **Investing in significant lowland landscapes** – recognising the outstanding environmental significance of fragile landscapes like the Broads National Park.

The Norfolk response noted the emphasis on the particular needs of the uplands in the consultation, and made the case for the investment needs of the significant lowland landscapes in our County. This is being explored further in the work on environment planning detailed below.

2.2 Agriculture Bill

2.2.1 In September 2018, the Government launched the Agriculture Bill, which largely takes the policy framework established in the earlier consultation as its starting point.

The Bill is relatively short, and includes few detailed proposals for future funding or activity. It does however establish an outline framework for future funding and legislation, with some detail on urgent areas such as the proposals for transition funding for farmers after EU exit.

The Bill states that the agriculture sector will be supported to become more efficient and productive with a range of possible measures including grants, loans and guarantees that will be introduced from 2021. There is a clear transition issue here, with current schemes already winding up in 2018. This is discussed separately later in the paper.

Key powers introduced in the Bill include -

2.2.2 Public Goods model

This provides the authority for a new payment for public goods model where land managers will be paid for delivering environmental and other public

benefits, subject to the rules of any new scheme which are yet to be determined. The measures which could be eligible for payment include:

- Improving air and water quality and soil health such as reducing ammonia emissions or soil erosion
- Providing habitats for wildlife including maintaining hedgerows, nectar plots for pollinators or food sources for farmland birds
- Reducing flood risk by a range of measures including planting trees and hedges
- Preventing climate change through, for example, peatland restoration to protect the existing carbon store and reduce emissions of CO2
- Improving public access to our countryside, which could include replacing access structures, enhancing public access
- Protecting iconic features of our countryside through, for example, maintaining drystone walls or other historic features.

In England, Environmental Land Management Contracts (ELMS) will be trialled and piloted before full implementation. There is no detail yet on the measures which will be used to assess impact.

2.2.3 Transition payments

The Bill sets out powers to phase out Basic Payments and introduce delinked payments. The policy statement for England gives more details on how this will be done:

- In claim years 2019 and 2020 Basic Payments will be made in the same way are they are now although the Government will look to make simplifications to make it easier to apply for and administer to increase value for money
- There will be a seven-year transition period from 2021 to 2027 when Basic Payments will be phased out completely
- Basic Payments will be "delinked" from the requirement to farm the land based on a reference year, and the Government will investigate the option of allowing a one-off lump sum payment in place of annual Basic Payments
- There will be changes to the administration of the Basic Payment Scheme to simplify, and greening requirements could be removed.

Basic Payments reductions will vary according to payment band as follows –

Payment Bands	Percentage Reduction	Example		
Up to £30,000	5%	A payment of £15,000 will be cut by £750 (5%)		
£30,000-£50,000	10%	A payment of £35,000 will be cut by £2,000 (6%)		
£50,000-£150,000	20%	A payment of £85,000 will be cut by £13,500 (16%)		
£150,000 +	25%	A payment of £210,000 will be cut by £38,500 (18%)		

This Part of the Bill also provides the Secretary of State with the power to modify retained EU legislation in relation to Rural Development to repeal, simplify or improve them. No detail has been provided on how this will be done in relation to programmes which are already being terminated and the question of

transition funding in rural development programmes has not been addressed.

2.2.4 Intervention in agricultural markets

The Bill enables the Government to provide financial assistance or carry out other interventions in the case of exceptional adverse market conditions that will potentially cause significant damage to producers. It does *not* cover exceptional events such as extreme weather or disease outbreak unless they result in markets being disrupted and damage to producers.

The actions from the Government could include making payments, loans and guarantees to affected farmers, or to operate the public intervention and private storage aid schemes. Any interventions should last no longer than three months, although there is provision to extend it for a further three months. Some of this is retained legislation from the EU but there are powers to temporarily change them if necessary to suit the UK conditions.

- 2.2.5 The Rural Strategy Steering Group has prepared a response to the Bill to feed into its readings via Norfolk's MPs. Key areas where the Bill does not address our concerns include
 - A 'level playing field' for food producers in relation to imports; guarantees protecting standards in relation to imports are not covered in the Bill.
 - We asked for clarity on future funding arrangements to be developed alongside trade policy. Assurance that the Bill's proposals for funding based around 'public good' can be modified in the light of emerging trade arrangements may be needed. Extra funding is promised to support farming in the case of adverse market conditions but more information on how this might be managed could be useful.
 - The Bill does not acknowledge the considerable gap between the end of current rural development programmes and the proposed start of new programmes in 2021.
 - The Bill focuses on agriculture, and does not develop the themes of the rural economy and skills which were covered in the spring consultation and welcomed in our response.
 - The Bill does not address the particular environmental needs of certain landscapes and the need for a degree of local determination of environmental need and sensitivity.
 - The proposal to 'delink' payments from ongoing land management raises a number of practical queries which need to be addressed.
- 2.2.6 Members are asked to support the approach of Economic Development and the Norfolk Rural Strategy Steering Group and to invite them to continue to monitor developments in food and farming legislation and policy and coordinate responses and lobbying where appropriate.

2.3 25 Year Environment Plan and local environment planning

2.3.1 It is clear from the Agriculture Bill and the consultation which preceded it, that a

great deal of post-Brexit funding for agriculture will be linked to 'public goods' including environmental actions. The Government has also recently published its 25 Year Environment Plan which sets out a blueprint for long-term responsible environmental management. Defra is keen to see Local Natural Capital Plans developed which provide locally relevant planning frameworks sitting under the national strategy.

Working closely with NCC's Environment team alongside key rural and farming stakeholders, it has been decided that the Norfolk Rural Strategy Steering Group is ideally placed to convene relevant organisations and individuals to start this planning process.

2.3.2 On 12 December 2018, Cllr Andrew Proctor will open a one-day 'Norfolk: World Class Environment' conference, hosting the event alongside Rural Strategy Chair, Clarke Willis. We have key speakers booked from the NFU, Broads Authority, UEA, Norfolk Wildlife Trust and are expecting 100 delegates to join us to begin the process of developing a Norfolk Environment Plan. There is a possibility that the plan may also extend to include all or part of Suffolk, subject to further discussions.

Once the Conference is concluded, the Norfolk Rural Strategy Steering Group will step back and allow the new emerging partnership to take on the detailed Environment Plan development, monitored by the Steering Group in relation to delivery of the Norfolk Rural Strategy.

3. Rural Development Funding programmes: update

- **3.1** Economic Development runs or is involved in delivering a number of key rural development programmes, which are detailed below. These are
 - The LEADER Programme, an £8m grants programme supporting rural businesses across rural Norfolk and North Suffolk.
 - The LIFT Programme, a £1.1m skills and employability grant programme operating in rural Norfolk and North Suffolk.
 - The Agri-tech Growth Fund.

NCC also oversees the delivery in Norfolk of the Rural Growth Programme (EAFRD) in collaboration with the Defra team running the Programme.

3.2 LEADER

The RDPE LEADER programme funds projects via a national (and indeed EU-wide) network of Local Action Groups - committees of local business people who use their local expertise to determine grants.

Norfolk County Council manages 5 of those Local Action Groups, covering all of rural Norfolk and some of north Suffolk. These are projected to fully commit the £8.1m budget available. The final deadline for Expressions of Interest was 27th September and the announcement of this deadline brought forward an additional 54 projects with anticipated grant requests in excess of £2.5m. The table below shows commitment to date and outlines the projected additional spend if all likely applications are submitted and approved. This figure exceeds the budget by £4.7m.

		Actual To	Achieve	Projected	Projected	
	Profile	Date	d	Add'l	Total	Projected
	£1,575,97	£705,907.		£1,653,73	£2,359,642	
Brecks	8.50	04	44.79%	5.63	.67	149.73%
	£1,362,97	£795,935.		£1,216,80	£2,012,740	
Broads	5.30	77	58.40%	5.02	.79	147.67%
Waveney	£1,590,73	£1,426,43		£921,946.	£2,348,385	
Valley	6.04	9.29	89.67%	04	.33	147.63%
Wensum &	£1,854,41	£1,488,82		£1,810,49	£3,299,320	
Coast	7.70	7.51	80.29%	2.84	.35	177.92%
West	£1,731,85	£1,026,64		£1,771,80	£2,798,458	
Norfolk	0.66	9.91	59.28%	8.24	.15	161.59%
	£8,115,95	£5,443,75		£7,374,78	£12,818,54	
TOTALS	8.20	9.52	67.07%	7.77	7.29	157.94%

The deadline for final applications is 15th November with all decisions being communicated and projects contracted by the end of March 2019. The LEADER Programme has facilitation costs built into its delivery, which means LEADER Facilitators can work to ensure that only viable projects go through the application process. It is anticipated that there will be more successful projects than budget available and NCC is constantly in dialogue with the Rural Payments Agency exploring possibilities of bringing underspend from around the country into the county.

Also submitted to the Committee is a document containing a wide range of case studies from LEADER, showing the range and significance of projects funded. In all cases, applicants are tested very strongly on their financial need for the funding, as LEADER is a 'funder of last resort', so we can be sure that none of these projects would have proceeded without LEADER funding.

3.3 The LIFT Programme is a unique £1.1m grant scheme supporting small-scale employability and skills projects in rural Norfolk and north Suffolk. Supported by ESF, with match funding from NCC, South Norfolk District Council and Broadland District Council, LIFT harnesses the local knowledge of the LEADER Local Action Groups as decision makers on grant applications. LIFT runs to March 2020.

LIFT encompasses three separate grant opportunities –

- LIFT Jobs, supporting employability projects to help people back into or towards work. Beneficiaries to date include the Charles Burrell Centre, Thetford, for a project to support local people back into work, and Clinks Care Farm for on-farm support with skills and confidence.
- LIFT Trials, supporting rural businesses to offer workplace trials. LIFT
 Trials has supported Moore Networking Ltd to deliver the Apprenticeships
 Norfolk Apprenticeships Training Agency pilot, supporting care leavers
 and other vulnerable young adults into work placements in rural
 businesses.
- LIFT Skills, offering support for training projects in rural businesses.
 Among the projects supported is a training programme for tourism businesses in the Waveney Valley and a project to support bespoke business coaching for productivity and growth in a number of rural businesses.

LIFT Jobs and LIFT Trials are now close to being fully committed, and we are working hard to bring forward more LIFT Skills projects for funding.

Programme Finances	Jobs	Skills	Trials	Total
Programme Team - Budget	£122,633	£182,844	£182,844	£488,321
Programme Team - Spend to Date	£51,399	£77,098	£77,098	£205,595
Programme Team - Balance	£71,234	£105,746	£105,746	£282,726
Total Grant Budget	£293,413	£440,185	£440,185	£1,173,783
Grant Committed (approved projects)	£271,465	£115,516	£293,414	£680,395
% Committed	93%	26%	67%	58%
Pipeline (EoI/FA received and inc committed)	£271,465	£133,931	£370,561	£775,957
% in Pipeline	93%	30%	84%	66%
Available grant if all EOI and FA approved	£21,948	£306,254	£69,624	£397,826
% Available if all EOI and FA approved	7%	70%	16%	34%

3.4 Rural Growth Programme

NCC Economic Development also works with DEFRA, the LEP and Suffolk County Council to ensure effective delivery of the Rural Growth Programme, with £13m available for rural businesses in Norfolk and North Suffolk in this Defra-managed programme. Contracted projects include a new packaging store for Anglia Free Range Eggs in Norfolk, and a production project for Yare Valley Oils. Other food processing, business development and tourism projects are in the application process, including a number of footpath and signage projects from the Norfolk Trails team under the tourism priority. The programme closed to new applicants in May 2018, with a high level of commitment nationally and certainly in New Anglia.

The commitments table shows projects which have received at least outline approval from Defra. Some projects will not make it through to the contracted stage, which is why Defra has over-committed at outline approval stage. Proactive support and promotion of the Programme from Norfolk County Council has helped to ensure high take-up from Norfolk businesses, as shown below.

	Norfolk projects outline approval	Suffolk projects outline approval	New Anglia projects total outline approval	New Anglia LEP allocation (funding available)	Total left in this priority
Food Processing	£5,434,087	£886,404	£6,320,491	£7,682,598.00	£1,362,106.66
Business	£1,779,969	£1,813,118	£3,593,088	£2,928,102.00	-£664,985.58
Development					
Tourism	£3,564,686	£219,000	£3,783,686	£2,413,441.00	-£1,370,245.00
infrastructure					
_					
Totals	£10,778,743	£2,918,522	£13,697,265		
Total funds				13,015,878	
available					
Total funds				-£681,386.92	
remaining					

3.5 The Agri-tech Growth Fund provided grants between £10,000 and £150,000 to support product development and improve agricultural productivity. Economic Development has promoted the scheme, undertaken assessments of projects across Norfolk and Suffolk (for which we earned income), and carried out monitoring. In 2016/17 we supported 9 projects, creating 55 jobs. Between January 2014, and April 17, 22 Norfolk companies benefitted from the scheme, obtaining R&D grants totalling £579,000, and growth grants equating to: £658,865. The applicants anticipated creating or protecting 77 fte jobs and 132 part-time jobs. Future funding for this scheme is not currently secured, opening up another funding gap for rural businesses seeking support to grow.

4. Post-Brexit funding and transition period

4.1 Funding from LEADER and the Rural Growth Programme (EAFRD) have been key to supporting the food, drink and agriculture sector and the broader rural economy for many years. Here in New Anglia we have successfully committed our full allocation of Growth Programme funding, and have more than enough applications in to spend the £8.1m LEADER funding available to the Norfolk and North Suffolk Local Action Group areas.

There is a lack of clarity for future financial support to the rural economy. The UK Shared Prosperity Fund should in theory support business growth across the whole economy, including rural areas, but is only at the earliest possible stage of consultation. Defra's consultation on the future of food and farming did pose questions about future support for rural communities, but no further detail on this is included in the Agriculture Bill. In any case, the Agriculture Bill states that new programmes will commence in 2021.

Defra had set an earlier end date for the end of its schemes than every other EU funding programme and had planned a last contracting date of 29 March 2019 in line with the date that the UK leaves the EU. The deadline for contracting projects has recently been extended to the end of 2020 in line with other EU Programmes, however NCC had worked towards the original date and is highly unlikely to have any funding remaining to allocate having published a final call for full applications closing on 13 November. There may be limited additional opportunities for further projects to be accepted, but essentially rural funding programmes are now closed for new business.

The prospect of several years without support for a wide range of farming and business growth projects in the rural economy is imminent. The process of developing a pipeline of projects for support for a new Programme takes a considerable time - and in rural areas it is harder for publicity to reach potential applicants. Awareness of and interest in funding opportunities will be lost.

We are also in danger of losing many years of expertise if key staff delivering rural programmes lose their jobs. Our staff are on fixed term contracts which will start to expire from March 2019. Without clarity around funding, staff, and the expertise that they hold, will be lost from the programmes. Staff who have no job security will obviously seek new posts elsewhere well before the deadlines.

For all of these reasons, it is imperative that transition funding is put in place from March 2019, with clear information available very soon so we can continue to develop a pipeline of projects. Otherwise, we will reach a point where we do not have established support in place for businesses trying to grow during the Brexit process.

A letter is being prepared for consideration by the Leaders of Norfolk and Suffolk

County Councils and the Chair of New Anglia LEP to jointly put pressure on Defra for transition funding for current rural programmes. The LEP's Food Drink and Agriculture Board, chaired by LEP Chair Doug Field, has already offered its full support.

Members are asked to endorse the approach taken to lobbying for transition funding to enable us to offer continuity of support to the rural economy while the new funding regime is being prepared.

5. Background

5.1 Norfolk Rural Strategy including Norfolk response to Agriculture consultation.

<u>LEADER Programme</u>

<u>LIFT Programme</u>

Annex 1 – case studies of LEADER funding.

Officer Contact

If you have any questions about matters contained in this paper or want to see copies of any assessments, eg equality impact assessment, please get in touch with:

Officer name: Vince Muspratt Tel No.: 01603 223450

Email address: vince.muspratt@norfolk.gov.uk



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