

Appendix 1

Detailed comments

	<p>We welcome the environment thread throughout the document as the environment is pivotal in ensuring resilience to climate change, quality of life, health, economic viability etc.</p>
Page 9	<p>Under Agreement 3 (To address housing needs in Norfolk) – suggest another bullet along the lines: “Ensuring that new homes are served and supported by adequate social infrastructure, including schools, libraries, fire service provision; play space and green infrastructure provided through developer funding (i.e. through S106 agreements and/or Community Infrastructure Levy)”</p> <p>There should be a cross-reference to this point in Section 7 (Infrastructure and Environment) on page 40.</p>
Page 18 and 19	<p>Population tables. – The paragraph on the top of page 19 doesn't appear to tally with the figures in tables 2 and 3 e.g. 15-64 3% growth in para whereas 20-64 in table 3 shows -5.6% ; & 0-16 in para shows 8.6% growth whereas table 3 shows -0.9% (0-19). While they are looking at slightly different cohorts there are quite big differences so should be checked</p>
Page 29	<p>Acronyms have been used without previously being stated in full. (SAC, SPA, SSSI)</p>
Page 48	<p>The section on Education should be updated to read:</p> <p>EDUCATION</p> <p>Norfolk's School Capacity return to the DfE (SCAP) indicates that Norfolk's school population will continue to grow over the next 10 years. Primary age population including the influence of housing with full permission will rise by around 4% and secondary by 22% (children currently in the school system including the additional 4% covered by growth). Further housing coming forward is likely to produce a higher increase percentage.</p> <p>More specifically, September 2017 school population is over 1300 more than in 2016. Year 10 currently has the lowest cohort of children and numbers have risen steadily since 2006 when that cohort joined the school system in reception. September 2016 reception cohort was nearly 800 pupils higher than it was 5 years ago.</p>

	<p>Recent years have seen a significant rise in the birth rate and demand for pupil places across the area. Pressure is mainly in urban areas which have seen the highest concentration of population growth. The speed of delivering houses is key to the requirements of school places so careful monitoring of housing progress is undertaken between County Council/District/Borough Councils.</p> <p>Standards in Norfolk schools have risen considerably over the past 5 years with 88% of schools being graded Good or Outstanding in 2017 compared with 70% 4 years ago.</p> <p>The Local Authority retains responsibility for ensuring that there is a sufficient supply of school places and works with a range of partners, eg. Dioceses and Academy Trusts to develop local schemes. Norfolk County Council’s School Growth and Investment Plan, published every January identifies three growth areas requiring more than one new primary phase school and a further 10 areas requiring one new school. Expansion to existing schools will also be required in some areas of the County. A new High School for north east Norwich is also being discussed and planned.</p> <p>Agreement 19 (Education) – is supported and would be strengthened by adding:</p> <p>“... and use S106 and / or Community Infrastructure Levy funds to deliver additional school places where appropriate”</p> <p>Also It would be useful if Agreement 19 could be expanded to indicate:</p> <p>“The authorities agree to continue supporting the implementation of the County Council’s Planning Obligations Standards as a means of justifying any S106 payments or bid for CIL funds needed to mitigate the impact of housing growth on County Council infrastructure”</p>
Page 50	<p>Under ‘Current Network’- the text says ‘The A47 continues as the A12 trunk road from Great Yarmouth to Lowestoft’. Highways England have recently resigned this section of road as A47.</p> <p>The document could make reference to development and improvement of the Major Road Network (MRN) following the announcement from DfT to invest monies from road fund duty. (There are no specific schemes identified but we expect to be asked for funding bids within the next 12 months).</p>
Page 57	<p>“New GI can also mitigate impacts on existing <i>ecologically</i> sensitive sites.”</p>

Page 58	The document should clarify what is meant by 'protection and maintaining the Wensum, Coast, Brecks and the Broads' and why these areas are significant. If the reference is targeted at designated sites of most significance to Norfolk e.g. Area of Outstanding Natural Beauty, National Park and European designated sites, these should be referred to in the appropriate context. The NSF should be specific that the GI network will also require <u>enhancement</u> in order to support growth.
Table 15	It is recognised that as the NSF is rolled forward and updated, there will be a need to add GI projects as they reach an appropriate stage in their development.
	<p>Comments from a public health perspective</p> <p>Several of these comments relate to the potential for shared priorities and consistent approaches rather than specific strategic cross boundary issues. Nevertheless, the NSF provides the opportunity to consider this potential.</p> <ul style="list-style-type: none"> • Support the principle to develop a “good relationship between homes and jobs” as it supports active travel and minimises vehicular movements, while recognising the need to avoid any potential adverse environmental impacts on residential accommodation of the employment activity within a close proximity (air quality, noise, access to open spaces etc.) (p.8) • Support “a major shift away from car use towards public transport, walking and cycling” (p.8). Recent <u>evidence review</u> by Public Health England on spatial planning correlates provision of active travel infrastructure and public transport with better outcomes relating to health, cardio vascular disease and road traffic accidents / KSI • Provision of good quality housing (p.9) is a fundamental determinant of health and we would strongly support a mix of accommodation which meets a variety of income and physical needs. The same PHE report emphasises the importance of warm and energy efficient homes on health outcomes. There is also evidence which highlights the importance of upgrading existing stock as well as the quality of new build and some reference to this may be welcome. It may also keep existing housing stock in use for longer, reducing the need for new build. • The review also highlights the need to consider particular housing needs of other groups such as those with a learning disability, history of substance misuse, affordable housing for those who are homeless and those with chronic medical conditions such as HIV / AIDS. The need to plan for older people and students is referenced (p.37) so specific reference here may make sure these groups are not overlooked

	<ul style="list-style-type: none"> • Access to sporting, physical activity and green and open spaces and facilities is supported and we want to ensure this is available across tenures and locations, with particular reference to the challenges within the housing White Paper on access to open spaces within urban areas¹ • With a 2036 end date for the framework, and the recent announcement on sales of petrol and diesel cars ending by 2040, the NSF could usefully reference cross border and cross agency work to support the switch to low emission vehicles, for example, charging points delivered both within new developments and at appropriate points on the road network (p.15). This is supported by recent <u>NICE guidance</u> on air quality • Consideration could be given to a consistent approach on urban design for example the use of green walls and planting to mitigate poor air quality or avoid unintended consequences relating to “air canyons” may be useful • With regard to population and household estimates and the impact of, for example, life expectancy we would also highlight a number of factors to consider from the recent <u>2017 Health profile for England</u> : <ul style="list-style-type: none"> ○ Life expectancy continues to rise, albeit at a declining rate, but the number of years spent in poor health is increasing. This will impact the need for particular housing, transport and service delivery solutions ○ The life expectancy gap between men and women is closing which may later affect the size of older person households over time ○ Deprivation and inequality continue to be key and enduring factors in poor health outcomes and so need addressing. Consequently access to housing and employment and the impact of spatial and economic planning on these factors needs consideration ○ There is growing evidence of the link between incidents of flooding (p.55) and poor mental health • It is recognised (p.31) that affordability is a key barrier to accessing good quality housing. Given the proposed changes in some definitions of affordability within the White Paper² we would welcome some consistent approach across the county which would support adequate provision across localities and reduce the risk of development being piecemeal over geographic boundaries. • Given the pressures on the electricity and water infrastructures we would support a countywide approach to increasing capacity which minimises environmental impact through construction materials and processes, noise and loss of green infrastructure
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¹ See White Paper 1.53 “avoiding a rigid application of open space standards if there is adequate provision in the wider area“

² Box 4 p.100

	<ul style="list-style-type: none"> • Without underplaying the importance of physical inactivity and smoking on causes of death (p.47) the 2017 state of England does introduce concerns about other factors, some of which may be ameliorated by spatial planning interventions. These include dementia and Alzheimer’s and poor diet. There are some links back not only to physical activity but also accessibility of affordable and good quality food. A county wide approach to land use and affordable fresh fruit and vegetables in particular would be welcomed • We would support use of the health Protocol, for example, to plan for and manage access to health care, although evidence suggests that other factors related to income, environment, education etc. are much more closely correlated to good health outcomes <p>Themes</p> <ul style="list-style-type: none"> • Underpinning this response are some key themes around: <ul style="list-style-type: none"> ○ Air quality ○ Affordable and good quality housing ○ Physical activity and transport ○ Diet and access to good food ○ Employment for all • We would also welcome cross-authority consistency on some of these key measures to reduce the risk of developments varying within the county and therefore impacting populations in different ways or enabling activity to pick locations where the health requirements are seen to be of a lesser order