

## **South Norfolk Green Party response to Stage C Regulation 18 Draft Strategy and Site Allocations Consultation – Greater Norwich Local Plan**

### **Q1 Please comment on or highlight any inaccuracies within the introduction**

At best, the actual delivery of new housing in the plan area has just exceeded 2,000 dwellings per annum, with 1,500 being more typical. At this build-rate, it will be 2038 before the allocation of development land for 82% of the 44,500 new homes in the existing Local Plan, the Joint Core Strategy (JCS) is used up.

In these circumstances we consider that any new sites allocated in the GNLP should be phased in when most of the existing JCS sites have been used. Otherwise developers will “cherry-pick” the most profitable sites and newly allocated green field sites in less sustainable locations will be developed first.

Paragraph 6 of the Introduction is clear that ‘the GNLP must also assist the move to a post-carbon economy and protect and enhance our many environmental assets.’ It will be difficult if not impossible to meet these targets if new housing to the scale proposed in the draft strategy is dispersed across the rural areas of Broadland and South Norfolk. The main justification for this appears to be the availability of primary school places in the “village clusters”, whereas there are more important measures for sustainability which should be taken into account, including the number of car journeys and journeys by delivery vehicles to new housing, along with the associated congestion and pollution resulting from them.

‘South Norfolk Council intends to prepare a separate village clusters plan covering sites for small-scale housing in the rural parishes of South Norfolk that collectively form primary school clusters, whilst the Broadland village cluster plan forms part of this Local Plan.’ Surely this should be produced at the same time as the GNLP so that the allocated housing can be considered and commented upon alongside it.

In the current Joint Core Strategy (JCS) Local Plan, housing and other growth was to be in and close to Norwich, with minimal new development to be permitted in the rural policy areas of Broadland and South Norfolk.

In this new draft plan there are to be ‘a **minimum** of 1,200’ dwellings on top of the existing commitment of 1,349. As there are already sites ‘to accommodate 9% more homes than ‘need’, along with two ‘contingency’ locations for growth’ (page 37) and does not include windfall developments in its housing totals, the word “minimum” should be replaced with ‘maximum’ or ‘up to’ as is the case with the figures for Broadland’s “village clusters”. The approach for the 2 authorities should be identical.

## **SECTION 2**

### **Q3 Please comment on or highlight any inaccuracies within the spatial profile.**

37. Mentions that life expectancy for men in Norwich is 10.9 years lower in the most deprived areas compared to the least deprived. We cannot see any specifics within the draft plan as to how this shocking fact is to be addressed.

41. states that ‘this GNLP needs to plan for additional housing needs above and beyond existing commitments based on the most up-to date evidence’, but bases calculations on the 2014 National Household Projections, SNGP requests the GNLP uses the 2016 National Household Projections. If the most recent ONS statistics had been used, current commitments are sufficient to cover housing needs to 2038

78. Involvement in the Government 's Transforming Cities programme for investment in the transport networks in the city and surrounding areas is welcomed and we look forward to the Transport for Norwich review.

80. However, in rural areas provision of sustainable transport is more vague. Here transport is 'dealt with on a local basis'. The Connecting Norfolk initiative mentioned needs to be aligned with new Climate change goals. In this document the **target** for percentage of the population in rural areas able to access public transport has dropped 10% since 2011 and no 'actual' figures seem to be available. The Liftshare initiative (not very well advertised) is welcomed.

Additional journeys created by new developments in rural areas will not only add to the 'carbon footprint' but will also add to congestion on the road network, affecting air quality and the wellbeing of residents. If the intention of the GNLP is to locate housing close to jobs, which we agree should be a major aim, then any additional allocations of housing should be located in or close to Norwich, where there are realistic opportunities to walk or cycle to work and to services, or to use public transport to do so.

86 'Policies in the GNLP will need to contribute to national targets to reduce emissions, plan for transition to a post-carbon economy and ensure new development is adapted to a changed climate.' We welcome this.

### SECTION 3

#### Q6 Do you support or object to the vision and objectives for Greater Norwich?

120 'Most new homes will have been built in and around Norwich and in the Cambridge Norwich Tech Corridor. In Norwich city centre and other *highly accessible and sustainable locations*' There is insufficient provision or access to services in many of the settlements within the "village clusters" so they cannot be described as such. The existence of a primary school is not 'good access to services and facilities' and therefore this level of new housing in "village clusters" should not be permitted within the GNLP.

126 Is an example of why habitations in rural communities would not be sustainable option as it will be a long time before 'electric vehicles will predominate throughout Greater Norwich.' The additional journeys will not only add to the "carbon footprint" but will also add to congestion on the road network, affecting air quality and the wellbeing of residents. If the intention of the GNLP is to locate housing close to jobs, which we agree should be a major aim, then any additional allocations of housing should be located in or close to Norwich, where there are realistic opportunities to walk or cycle to work and to services, or to use public transport to do so.

129. We support CPRE's statement that it is imperative that Per Capita Consumption (PCC) of water is further reduced to below the Government's prescribed 110 litres per person per day and in order to ensure that the water-supply to existing users is not compromised the number of new houses should be a level that realistically covers actual need, and this fact reinforces our case for phasing of housing and our questioning of the need for a higher than necessary buffer.

132 States that new quality development will be located to minimise the loss of green-field land. The best way to achieve this is not to allocate additional sites for housing in "village clusters". Indeed, there are already sufficient allocated sites for housing in the JCS being proposed to be carried forward to the GNLP in the Norwich fringe parishes, main towns and key service centres to keep pace with the likely build rates of development. The exception to this should be any brownfield sites, particularly those within Norwich, which should be prioritised into a "brownfield first" policy. This should form part of a phased approach to new housing, so that existing allocations from the JCS and any brownfield sites should be developed before permitting any additional allocated sites to be built-out

One effective way to prevent the unnecessary loss of much greenfield land would be to institute a green belt on the “green wedges” model around Norwich, as requested by 84 respondents and 1,912 petition signatories (currently at 2,200 signatures) calling for this according to the draft statement of consultation, September 2018, for the Stage A Regulation 18 Site Proposals and Growth Options consultation. It is of great concern that this proposal or option has been removed from the current consultation.

So we find that the vision and objectives contain serious flaws, particularly the way in which they conflict with policies within the current Local Plan, which withstood the rigorous inspection process.

#### **SECTION 4 : ADDRESSING CLIMATE CHANGE**

##### **Q9 Do you support, object, or have any comments relating to the approach to Housing set out in the Delivery Statement?**

This states that it will ‘accommodate 9% more homes than “need... and additional opportunities will be provided, particularly for small scale growth at villages...’ SNGP disagrees that such a high level of sites should be provided within the GNLP and that villages should not have growth until there is suitable sustainable public transport. If they are not served by existing routes, new public transport infrastructure must be provided for before they are occupied so that, from the outset, residents will not be reliant on private car ownership.

We would question why there is no mention of phasing as an option within the Draft Plan and Housing Delivery Statement, as this would help to prevent the worst excesses of unnecessary development.

There is no reason why new sites allocated in the GNLP should not be phased. They would then be available for development should building rates increase, but if house completions remain at existing rates, as appears likely, these sites should stay on a reserve list and valuable countryside would be protected.

69 Parish and Town Councils in Broadland and South Norfolk (over 38%) have supported CPRE Norfolk on this issue and have signed a pledge to this effect. With this groundswell of grassroots opinion making such a strong case, we urge the GNLP in producing the GNLP to consider phasing seriously as the most reasonable way forward.

Only **45%** of homes are well insulated in Norwich and 41% in South Norfolk. This represents a shocking waste of energy, high greenhouse gas emissions and unnecessarily high energy bills. **12%** of households in the area are in fuel poverty, which means they can’t afford to heat their homes properly. Poor insulation contributes to this problem. Upgrading the insulation of **3,309** homes per year within the Norwich area would ensure all homes are properly insulated by 2030, lifting as many people as possible out of fuel poverty.

It would be helpful to quote the Certification schemes that will be used. The TCPA recommends:

The BRE’s Home Quality Mark (HQM) BREEAM for buildings, CEEQUAL for public realm/infrastructure and BREEAM for communities and the Passivhaus Trust’s Passivhaus assessment frameworks

Air pollution impact assessments should be required for applications likely to have a negative impact on air quality.

Developments that create ‘street canyons’ should be avoided. A minimum number of electric vehicle charging points per 10 dwellings should be stipulated,

## Q12 Do you support, object, or have any comments relating to the Climate Change Statement?

We cannot see how the proposed additional allocation of sites for housing in “village clusters” can be justified with regard to Climate change targets. You say there will be **‘Growth in villages is located where there is good access to services to support their retention’** Many services are simply not located within these “village clusters” and the additional journeys needed to access them would be contrary to measures 2 and 3 of the Climate Change Statement.

There is little detailed policy on the design of new housing in the draft Plan document, other than a brief mention in the ‘Design of development’ in the Climate Change Statement. Detailed requirements to insist that new houses include a detailed carbon assessment and are built to the highest possible environmental standards beyond the Government’s minimum standards are needed, if serious steps are to be taken towards addressing Climate Change issues.

We welcome the guidance of the Town and Country Planning Association Climate document which states :

‘4.5.1 Local development plans must contain policies which, taken as whole, secure radical reductions in carbon dioxide emissions and that Local authorities must have an effective monitoring regime to ensure that there is clear evidence of progress on reducing carbon dioxide emissions, and this progress must be clearly recorded in their annual monitoring reports.’

The methodology to ensure this is not mentioned. As well as CO<sub>2</sub>, particulate matter (PM) (PM<sub>2.5</sub> and PM<sub>10</sub>) that come off tyres and exhaust or nitrogen dioxide (NO<sub>2</sub>) gas are both major components of urban air pollution, long-term exposure them increases cardiovascular and respiratory diseases. Currently, there is no clear evidence of a safe level of exposure to PM below which there is no risk of adverse health effects.

The online air monitor at Castle Meadow shows significant increases in pollution levels in the last 2 months on last year’s figures.

Apart from vague statements about developments needing ‘to improve green infrastructure’ there is no mention of any urban tree planting, or any urban planting to help mitigate the increasing pollution in the city and help reach carbon targets.

Some more specifics would be useful, for example from the City of London’s current best practice, informed by scientific evidence, for using green infrastructure to reduce public exposure to road transport pollution.

[https://www.london.gov.uk/sites/default/files/green\\_infrastruture\\_air\\_pollution\\_may\\_19.pdf](https://www.london.gov.uk/sites/default/files/green_infrastruture_air_pollution_may_19.pdf)

and the University of Surrey’s guide - Implementing Green Infrastructure for Air Pollution Abatement: General Recommendations for Management and Plant Species Selection

[https://figshare.com/articles/Considerations\\_regarding\\_green\\_infrastructure\\_implementation\\_for\\_improved\\_air\\_quality/8198261/3](https://figshare.com/articles/Considerations_regarding_green_infrastructure_implementation_for_improved_air_quality/8198261/3)

Tree planting throughout Norfolk must be encouraged. NNDC has pledged to plant 110,000 trees but can find nothing proposed for the other councils.

We would like to see a timeline and specific targets for schemes. For example for all public buses and taxis in Norwich to be electric and a charging system similar to London for polluting vehicles using a LEZ (low emission zone) in the city. FOE say South Norfolk should aim to improve the current 16% commuter journeys by public transport, cycling, walking to 40%, and give Norwich a target of **70%** of people commuting by public transport, cycling, and walking by 2030.

When cars are needed, they should be shared as much as possible. Only **11%** of commuters share their car when commuting in the Norwich area. According to social enterprise Liftshare, best in class employers have 40% of their staff sharing journeys to work.

Targets for renewable energy generation are not mentioned.

Currently the Norwich area has **7MW** of renewable power and the South Norfolk area has **63MW** matched with the best of similar local authority areas they would have **29MW and 251MW** respectively. This is a minimum target to be achieved rapidly, and all local authorities should look to exceed it.

FOE recommend all councils identify both a councillor at cabinet level and a lead officer as Climate and Nature Champions who are required to publish a bi-annual independent and audited report to the public on progress in meeting climate change and nature targets.

Lastly please consider implementing the Friends of the Earth recommendations to secure sufficient resources to invest in the changes needed to restore nature and meet climate goals:

- Use legal and planning mechanisms such as Section 106 agreements, Community Infrastructure Levy and other mechanisms to fund climate actions and nature restoration projects.
- Raise money from the UK Municipal Bonds Agency for low carbon infrastructure.
- The Workplace Parking Levy (WPL) places a modest charge on employers providing 11 or more parking places, and invests the revenue in sustainable transport measures such as new tram routes, electric buses, cycling and public transport smartcards.

**Q13 Do you agree with the proposed Settlement Hierarchy and the proposed distribution of housing within the hierarchy?**

We supported the continuation of the settlement hierarchy as defined in the JCS. We wonder why and where the unsustainable concept of “village clusters” has been introduced into the planning process. A real strength of the JCS was its inclusion of a Norwich Policy Area and Rural Policy Areas, and therefore we are very disappointed that this distinction has been abolished.

The Rural Policy Areas gave real protection to the countryside: this is threatened by the introduction of the village cluster approach. This is another example of how the Draft GNLP contradicts the existing agreed Local Plan.

We therefore strongly support urban concentration in and close to Norwich as the way forward, because it is best for the environment, minimising climate change and the well-being of residents.

**Q14 Do you support, object, or wish to comment on the approach for housing numbers and delivery?**

Paragraph 146 claims that the strategy ‘is informed by consultation feedback’, yet chooses to ignore much from previous consultations even where such feedback was significantly in favour of a particular approach. An example of this is the position taken towards windfalls. Responses to the Stage A Regulation 18 Site Proposals and Growth Options consultation were significantly against (110 to 45) counting windfalls in addition to the additional (at that point 7,200) housing, and yet this has been ignored in the current draft plan consultation. By not counting windfalls in the calculation for housing numbers in table 6, there will be a resulting over-supply of houses, particularly if the out-of-date 2014 National Housing Projections are used. Windfalls are acknowledged as a reliable source of new housing and many Local Authorities do count them towards their housing targets: their contribution towards housing targets in the GNLP should lead to a reduction in the number of new sites which are allocated.

159 As previously mentioned in the introduction comment, use of the word “minimum” needs to be removed and replaced by a “maximum” total.

164-4 We cant see how the growth in villages ‘will support local services’ rather it will be a drain on them.

As previously mentioned sites in the existing plan (JCS) should be developed before any new sites that are likely to be added in to the emerging GNLP are built out. Although we understand that it will not be possible to prevent new sites being included in the plan, we are asking that these extra land allocations for housing are treated as phased development and that building should not occur on these sites until the current JCS sites have been used up. We think this is a sensible approach because not only does it protect the countryside, but also at current rates of house building there is enough land already allocated in the JCS to cater for the building that is likely to occur over the new Plan period.

As previously mentioned developers ‘cherry-pick’ the most profitable sites, which are likely to be the newly allocated green field sites and that this will lead to even more land banking of currently allocated sites. This will also mean that many less sustainable sites for housing are developed resulting in more pollution and congestion, with the negative consequences for the climate and climate change. It also means that expensive infrastructure which has been provided to facilitate new housing in the existing plan, could end up being an irrelevant and embarrassing white elephant.

It is disappointing that there is no mention of phasing as an option within the consultation document, as this would help to prevent the worst excesses of unnecessary development. 69 Parish and Town Councils in Broadland and South Norfolk (over 38%) have signed a pledge to this effect, which was included in the previous consultation, but ignored in the current draft Plan. With this groundswell of grassroots opinion making such a strong case, we urge the GNLP in producing the GNLP to consider phasing seriously as the most reasonable way forward. Clearly there is a democratic deficit: meaningful consultation should not ignore this volume of common-sense opinion.

## **POLICY 2 - SUSTAINABLE COMMUNITIES**

### **Q18 Do you support, object or have any comments relating to the preferred approach to sustainable communities including the requirement for a sustainability statement?**

The use of the words ‘as appropriate’, in the policy’s introduction, mean the requirements would be far too open to interpretation as to what is ‘appropriate’

This concern is particularly relevant when considering how new housing development in the “village clusters” will fulfil the first requirement to ‘ensure safe, convenient and sustainable access to on-site and local services and facilities including schools, health care, shops, leisure/community/faith facilities and libraries’ when these are simply not available in most villages.

### **Q19 Do you support, object or have any comments relating to the specific requirements of the policy?**

Table 8

#### **Point 3 Green infrastructure**

‘Developments are required to provide on-site green infrastructure appropriate to their scale and location.’ The guidance document on green infrastructure for developers should include:

- **Green roofs and walls:** at all scales of development ranging from house extensions to multi storey blocks. The city centre in particular is dominated by hard surfaces; green roofs and walls would create green stepping stones and connect up ecological corridors such as rivers and railway lines.
- **Urban tree planting in and around Norwich:** increasing tree coverage should be viewed as strategically important and not simply as an add on extra. As the 25 Year Environment Plan makes clear, urban trees make towns and cities more attractive for living and working, they bring people closer to nature and improve air quality. As well as increasing the amount of tree cover in the built up area, we would ideally like to see large areas of woodland for public recreation planted close to the

Norwich built up area, similar to the network of forests planted under England's Community Forest programme. Although this is unlikely under existing government funding, the Government has committed to increasing woodland coverage in the UK and future funding for agri- environment schemes might be at a level to stimulate the interest of local landowners.

- **Private gardens;** they are an important component of green infrastructure. We are seeing a trend for subdivision of gardens for housing development in Norwich and loss of these smaller green spaces is progressively chipping away at the city's green character. Although gardens will probably be regarded as an issue for local development management plans, we consider that this issue should be addressed at a wider level.

Point 9, Water.

We would like to see encouragement for initiatives for harvesting and storage of rainwater and water from flood management that can later be used for irrigation during dry periods. And SUDS using Green roofs.

For greater transparency, annual monitoring reports should not only report the number of applications approved contrary to Environment Agency advice on flood grounds, but should give detail on these applications, why they were approved, what the advice was, what measures have been taken to mitigate flood risk, and how impact is being monitored. Monitoring should also be done on of Waste Water Treatment Works, both on the discharge of effluent into river systems, and on flood risk with foul water.

We welcome opportunities for the use of sustainable local energy networks but refer back to the targets for renewable energy mentioned above.

### **POLICY 3 – ENVIRONMENTAL PROTECTION AND ENHANCEMENT**

#### **Q21 Do you support, object or have any comments relating to the approach to the natural environment?**

We welcome the support of the NSPF objectives on environmental protection, landscape protection and biodiversity and the statement that development should deliver biodiversity net gain but it is short on specifics of how this will be measured.

We welcome the commissioning of the Norfolk-wide study, the Green infrastructure and Recreational Impact Avoidance and Mitigation Strategy see comments above.

#### **Q22 Are there any topics which have not been covered that you believe should have been?**

Yes, the decision to remove a possible green belt for Norwich or the green wedges (or other) model from the draft Local Plan particularly bearing in mind the large degree of support it received in the earlier Stage A Regulation 18 Site Proposals and Growth Options consultation.

We feel a clear indication that certain areas of land are completely off-limits for large-scale development is necessary. This could then motivate housebuilders to actually build out some of their brownfield sites, since they will see that, no matter how long they wait, development in some protected rural areas outside the city will never happen. This will:

- **Check the unrestricted sprawl of large built-up areas** preventing neighbouring towns merging so they preserve their unique identities where they have them and don't just become

- dormitory towns for an expanded Norwich conurbation
- **Assist in safeguarding** several particularly sensitive areas of countryside that have special ecological significance, or because of their importance for the rural economy.

**Q23 Do you support, object or have any comments relating to [the] approach to transport?**

206. SNGP supports the provision of new railway stations at Rackheath and especially Dussindale as outlined in

211. In Policy 4 – Strategic Infrastructure aims ‘to promote modal shift’ by having ‘significant improvements to the bus, cycling and walking network’ but this is in direct conflict to promoting ‘delivery of the Norwich Western Link road’

The wording of ‘Improvements to’ Norwich Airport becomes ‘growth of’ in the Strategic Infrastructure section, which does not support climate change visions and objectives to help decarbonise development stated in Section 4.

Public transport provision needs to be improved and made affordable, not only between main towns and key service centres, but to and from smaller settlements. This is essential even without any further growth of these settlements, as many areas of rural Norfolk have become public transport deserts.

There is no mention about the delivery of the Bus Rapid Transport network promised in the NATS and the JCS. Delivery of this network is integral to NATS and approval for the NDR at the public enquiry was conditional on its delivery, highlighted in Norwich Green party response to the previous draft.

**Q27 Do you support, object or have any comments to [the] approach to affordable homes?**

SNGP supports the affordable housing policy within Policy 5 – Homes. It is essential that the requirements of this policy are followed when progressing applications for housing on sites of 10 dwellings or more. Any policy which encourages the building of a greater proportion of affordable homes should be adopted.

Ideally, affordable and social housing should be provided where needed as a stand-alone provision, and not be connected to private developers’ housing targets. Lessons must be learned from the history of poor delivery of affordable homes, to ensure that the policy to provide 28% or 33% affordable houses must be enforced. We support rural exception sites as a means of supplying needed local affordable and social housing. An approach based on the provision of stand-alone sites such as these, in our opinion is a far better method for addressing affordable and social housing needs.

Developers who use viability assessments to try to argue down their affordable housing contribution should be required to show that they have explored options for redesigning schemes that do not impact on the level of community benefits to be provided. These viability assessments should be open to public scrutiny, and should be published online early enough for meaningful scrutiny to take place.

**Q34 Do you support, object or have any comments relating to the approach to employment land?**

The development of land allocated in the JCS should be prioritised before any new sites are added. While pleased to see no new allocations of sites at the Food Enterprise Zone there are 40 hectares proposed at Norwich airport, promoting out-of-town commercial and industrial development that is poorly served by public transport. Any analysis of these options is likely to show that they will increase carbon emissions.

SNGP while not agreeing with the allocation of so much green-field land for employment/economic use, insist it is essential that any such allocated sites are adhered to, particularly for larger businesses.



**Q45 Do you support or object or wish to comment on the overall approach for the village clusters? Please identify particular issues.**

SNGP are concerned as to why JCS current settlement hierarchy categories of Service Villages, Other Villages, smaller rural communities and the countryside have been removed in favour of “Village Clusters” appear to be an artificial concept, invented to justify the dispersal of housing into the countryside and is not even offered as an ‘alternative approach’ in the draft GNLP.

The entire purpose of a settlement hierarchy is to determine the definitions that can be used to assess their sustainability for growth. Rural communities are very different from service villages and adding to these villages means more car journeys to their nearest service villages.

Housing should be allocated appropriate to each category of community/settlement within their own setting, landscape and context rather than lumping them together in a “village cluster”.

Even if the “village clusters” are adopted it would still be important to limit these to the area within their settlement boundaries and to designate the remaining largely rural areas as “countryside”, which would then require a further policy similar to the current JCS policy 17: smaller rural communities and the countryside. It is a great regret that the Rural Policy Areas of the JCS will be eliminated in the GNLP, as these provided effective protection of the countryside from unnecessary development.

We are concerned that the “village clusters” in Broadland and South Norfolk are being dealt with in a different way as the GNLP is a strategic plan for the whole of Greater Norwich, and that “village clusters” in South Norfolk will not be scrutinised to the same degree as those in Broadland due to the separate South Norfolk Village Clusters Housing Site Allocations document.

The maximum number of new housing for both areas should be included in the GNLP rather than the current different approach/wording, by having Broadland’s “village clusters” providing ‘up to 480’ whereas South Norfolk is to provide ‘a minimum of 1,200’: both areas should have the same wording i.e. ‘up to ...’.

**Q47 Do you support or object or wish to comment on the overall approach for Small Scale Windfall Housing Development? Please identify particular issues.**

Appropriate sites for development have been allocated within settlement boundaries and it is not necessary to raise the buffer, small scale windfall should be seen as contributing to the overall need identified in the plan rather than in addition.

**Q48 Do you support or object or wish to comment [on] any other aspect of the draft plan not covered in other questions? This includes the appendices below. Please identify particular issues.**

In the JCS housing was concentrated in and close to Norwich and it was agreed to and supported by hugely expensive infrastructure projects, in particular the Northern Distributor Road (now known as the Broadland Northway), which was primarily constructed to distribute traffic from and to new housing developments on the northern fringes of Norwich and in the North-east Growth Triangle. It would be a massive and costly folly to change that policy to one which allowed for the dispersal of much housing across the rural areas of Broadland and South Norfolk, where there is insufficient infrastructure, services and public transport, which would mean such development would be unsustainable. This would only lead to more congestion and pollution, leading to problems in meeting carbon-reduction targets.

We strongly support the inclusion of a specific policy on air quality.

We would like to see a policy with a target on space for community food growing within new developments.

For reducing carbon emissions and footprint of local authorities we would like to see the councils themselves commit to:

- Retrofit council-owned properties with high levels of insulation and heat pumps where possible.
- Require buildings built on council land to be extremely energy efficient, using the Passivhaus standard or similar.
- Require deliveries to the council to be by electric vehicles or bike (e.g. through setting-up a distribution centre for onward deliveries by clean vehicles)
- Ban the use of single-use plastic in council offices and premises
- Adopt circular economy waste policies in relevant plans and contracts.
- Double tree cover on council-owned land, update local planning strategies to double tree cover across the Local Authority area, and ensure existing trees are properly protected in order to store carbon, support nature, improve soils and water quality, and aid flood protection and urban design.
- Manage council-owned land and road verges to increase biodiversity and drawdown carbon pollution, including through reduced pesticide use and increased planting of wildflowers.

Waste was only briefly covered and targets need to be set.. All councils should aim to send zero waste to landfill or incineration. Norwich reuses, recycles and composts **38%** of its household waste. This compares to the best figure of **58%** in similar local authorities. South Norfolk reuses, recycles and composts **43%** of its household waste. This compares to the best figure of **68%** in similar local authorities,

We welcome the replacements and improvements to Recycling sites mentioned in the Appendix

Care accommodation was not fully covered in the document, this is crucial for the needs of an increasing aging population.

We agree with CPRE that current consultation processes are not reaching the majority of people although we appreciate roadshows were provided in many locations, perhaps a Citizens' Assembly approach would be a means which would enable more people to be involved.

**Submitted by Carol Sharp on behalf of South Norfolk Green Party**