

Consultation Documents Update and Proposed Responses
Report by Planning Policy Officer

Summary:	This report informs the Committee of the Officers' proposed response to planning policy consultations recently received, and invites any comments or guidance the Committee may have.
Recommendation:	That the report be noted and the nature of proposed response be endorsed.

1 Introduction

- 1.1 Appendix 1 shows selected planning policy consultation documents received by the Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2 The Committee's endorsement, comments or guidance are invited.

2 Financial Implications

- 2.1 There are no financial implications.

Background papers: None

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Date of report: 9 June 2016

Appendices: APPENDIX 1 – Schedule of Planning Policy Consultations received

APPENDIX 1

Planning Policy Consultations Received

ORGANISATION:	Waveney District Council
DOCUMENT:	Waveney Local Plan Issues and Options
LINK	http://consult.waveney.gov.uk/consult.ti/optionsforanewlocalplan2016/consultationHome
RECEIVED:	22 April 2016
DUE DATE:	17 June 2016
STATUS:	Consultation
PROPOSED LEVEL:	Planning Committee endorsed.
NOTES:	This is the first stage of Waveney Council's Local Plan. It asks questions on a broad range of topics.
PROPOSED RESPONSE:	<p>A very well presented document which is easy to read and follow.</p> <p>Many issues are similar to those which the Broads Authority are looking into. As the Plan progresses, we would be particularly interested in understanding what is said and what you plan to do to address these issues:</p> <ul style="list-style-type: none"> • Providing plots for self-build • The strategic policies for Neighbourhood Plans to be in conformity with • Assets of Community Value • Protecting non designated heritage assets • Protecting locally designated sites of biodiversity value. <p>The evidence base that has been produced or is going to be produced – do these (or will they) cover the entire Broads? This approach is useful for the Broads Authority.</p> <p>Page 4 – the AONB and the Broads are not necessarily issues. That implies a negative. Perhaps this chapter could be called 'key considerations'.</p> <p>Q3. We hope that the Broads will be mentioned in some way in the vision and objectives.</p> <p>Page 6 – It is recommended that the housing need of the Broads part of Waveney is explained. That is to say that the ORS study calculated an OAN for the Broads part of Waveney. This is calculated as 51 dwellings between 2012 and 2036 using the jobs led growth scenario. Perhaps emphasise that this is not additional to, but part of the Waveney OAN. I feel this link and explanation is important for both the WDC and BA Local Plans and Duty to Cooperate.</p> <p>Q27. Is there any potential for the proposals off shore to affect the Broads? That is to</p>

	<p>say, the cables and stations associated with transporting power generated off shore, is there a need for these to go through the Broads for example? It is recommended that any future policies that relate to such infrastructure in Waveney should be worked up with the Broads in mind.</p> <p>Q32. Please note that it is intended that the Broads Authority Local Plan defers to the district's policy on affordable housing as is the case currently.</p> <p>Q43. The Broads Authority intends to bring in some parts of the PPS7 into policy as there are some improvements needed to our current policy (DP26). Please go to this webpage near to 27 May to see the draft topic paper. http://www.broads-authority.gov.uk/broads-authority/committees/planning-committee/planning-committee-27-may-2016</p> <p>Q60. BA and WDC officers have discussed the potential for a consistent policy and mapping approach for the District Centre at Oulton Broad as it is a shared Centre. We look forward to working together to work this up.</p> <p>Q70. The Broads Authority Issues and Options discuss the issue of landscape sensitivity in the Broads for such development. This study relates to wind turbines as well as solar farms. This study also looked at the boundaries of the Broads. It is requested that Waveney DC consider the study as their approach to renewable energy is worked up. http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-sensitivity-studies</p> <p>Healthy communities section. The Norfolk authorities are working together on the health infrastructure requirements generated as a result of the OANs of each of the districts. There is also a protocol and checklist. I believe that Waveney CCG have also been involved in this work. You may be aware of this work, but if not, please let me know and I can put you in touch with the lead officers.</p> <p>Q88 – GI Study. Did this cover the entire Waveney district, including the Broads? Are there any recommendations that the Authority should consider as it works up its Local Plan? Can the Authority help in the delivery of the GI Study?</p> <p>On GI, it should be noted that there are early conversations with regards to a Norfolk-wide GI map. The details are being worked up, but if you are interested in understanding more, please let me know and I can put you in touch with the lead officer.</p> <p>Landscape character. The next version of the Local Plan should set out how Waveney will consider, protect and enhance the setting of the Broads.</p> <p>Q97. Our Dark Skies study (http://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/757402/Broads-Authority-Dark-Skies-</p>
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	<p>Study-March-20161.pdf found that a particularly dark area is around Geldeston. The Authority is working up a policy relating to light pollution. It would be welcomed if WDC could consider areas that are particularly dark in the Broads and consider light pollution near to those areas in particular, although lighting in the district generally could also be addressed.</p> <p>Site allocation maps. Please can all future maps show the Broads Authority Executive Area?</p> <p>Thank you for sending us a map with the Authority's area marked on. There are many proposed sites near to the Broads. As the allocations are worked up the issue of landscape impact on the Broads and its setting from adjacent sites as well as those near to the area needs to be considered. Any natural features such as trees and hedgerows on the sites can benefit wildlife in the Broads and their importance assessed with the aim of retention on site. Some specific comments follow.</p> <p>Site 91 is within the Broads Authority Executive Area.</p> <p>Site 39 – Housing development at this location has the potential to impact adversely on both the landscape character (LCA 2) and the visual amenity of the users of the Broads. Any scheme at this location would need to be sensitively designed to ensure that potential impacts are assessed and mitigated through a suitable layout and the provision of adequate vegetation buffers both on the northern boundary and within the site as it is located on rising ground. Street lighting and other above ground utilities may be an issue as well.</p> <p>Site 146 - this site is on rising ground with the potential for impacts on visual amenity and landscape character (LCA2 and 3). Views across the valley are panoramic. The existing development in this area breaks the skyline. This area of land outside the Broads forms its setting for the Broads. If this site was to come forward it will have to be very carefully designed in order to mitigate likely impacts which would need to be assessed very carefully.</p> <p>Group of sites to the south of Beccles – As they are on rising ground, any development proposals would need to be assessed for potential landscape and visual impacts on the Broads area.</p> <p>Group of sites around Barnby/North Cove – In addition to potential impacts on landscape character (LCA5) and visual amenity for users of the Broads, further development of housing has the potential to increase the recreational pressures on the Broads.</p> <p>Sites 7 /112 /111 – These lie along the Broads boundary albeit separated by the railway line. Potential for impacts on Landscape character (LCA6) and visual amenity. This would extend the urban boundary of Lowestoft towards the Broads area. Certainly</p>
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	<p>there are likely to be additional recreational pressures as a result of housing development in the area. The Suffolk wildlife Trust and the Carlton marshes reserve lie in close proximity. Housing development at this locating could also create additional land use pressures on fields and grazing marsh in close proximity as residents may seek land for other activities such as allotments, horse grazing etc.</p> <p>Sites 18/53/51 Camps Heath area. There are existing pressures on Oulton Broad marshes relating to land use. I believe there is an article 4 direction on the land now. Additional housing may add to these pressures as well on the marshes as a recreational resource.</p>
ORGANISATION:	Salhouse Parish Council
DOCUMENT:	Salhouse Neighbourhood Plan
LINK	http://www.salhousevillage.org.uk/page21.html
RECEIVED:	31 May 2016
DUE DATE:	14 July 2016
STATUS:	Consultation
PROPOSED LEVEL:	Planning Committee endorsed.
NOTES:	<p>Background</p> <p>This Pre-Submission Consultation Draft Neighbourhood Plan for Salhouse has been prepared over the course of 2014/15/16 by a Working Group representing a range of community interests in the village. It represents the first opportunity for local residents and other stakeholders to see the first draft of the Neighbourhood Plan in full.</p> <p>Planning Committee (and Broadland Council) designated Salhouse as a Neighbourhood Area for the purpose of producing a Neighbourhood Plan on 7 November 2014.</p> <p>Summary of document</p> <p>As a brief summary, the plan seeks improvements for walkers and cyclists in the area. It seeks the retention of important businesses. It emphasises the importance of the rural aspects of the village.</p> <p>Next Steps</p> <p>Once this stage of consultation is complete the Working Group will review the comments received and revise the document accordingly. The document will then be submitted to Broadland District Council and the Broads Authority for review. Following a further process of public consultation, Broadland District Council will appoint an independent specialist examiner to review the Plan. The results of this examination will be publicised. Following that, Broadland District Council will organise a local referendum where residents of Salhouse (Parish) will be asked to vote on the Plan. If more than 50% of votes are in favour of the Plan. It will become an adopted document and have sufficient status to help make a real difference to the future of the village and shape future proposals put forward by developers.</p>
PROPOSED	<u>Neighbourhood Plan</u>

<p>RESPONSE:</p>	<p>In general the document is well presented. It is acknowledged that only a small part of the Broads is within Salhouse Parish, but there could be potential for policies within the Neighbourhood Plan to be used by the Broads. The following comments are offered to help the Parish Council as they finalise the Neighbourhood Plan.</p> <p><u>Dark Skies</u></p> <ul style="list-style-type: none"> • We support the notion of protecting the dark skies. The Authority has assessed the dark skies of the Broads and this information can be found here: http://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/757402/Broads-Authority-Dark-Skies-Study-March-20161.pdf • We would be willing to lend our dark sky meters to the Parish Council and share our methodology and tips if they wish to assess the quality of their dark skies. • Considering how important dark skies seem to be to the Plan, is it worth making a part or entire objective that relates to maintaining dark skies? <p><u>Reference to the Broads</u></p> <ul style="list-style-type: none"> • Please use the term 'Broads' rather than Norfolk Broads as we are partly in Suffolk as well. • In planning related documents I advise against calling the Broads a National Park. This term is only really used for branding. Perhaps use 'member of the National Park' or 'equivalent status to a National Park'. • When referring to the area of the Broads, we often use 'Broads Authority Executive Area'. <p><u>Detailed comments</u></p> <ul style="list-style-type: none"> • Page 7 – end of first column. Suggest the word 'guidance' is replaced with 'policies'. • The map on page 9 is blurry and out of date. The Site Allocations Local Plan has now been adopted and the new map is on page 10 of this: http://www.broadland.gov.uk/PDF/Site_Allocations_DPD_Policies_Maps_Part_B.pdf • Page 9 top of column 1 – Salhouse Broad is within the Broads Authority Executive Area. • Page 10 first column – part of the parish is within the Broads. • Page 10 – please also refer to the Broads Landscape Character Assessment which can be found here: http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-character-assessments • Page 10 – deprivation. Have you looked at the domains that make up the Index of Multiple Deprivation? There could be some domains which your Plan may wish to try to address. You can find the domains and their sub domains here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/467765/File_2_ID_2015_Domains_of_deprivation.xlsx. Also, see our assessment here: http://www.broads-authority.gov.uk/_data/assets/pdf_file/0005/764474/The-Index-of-Multiple-Deprivation-Topic-Paper.pdf • Page 10, third column where it says 'easy access to Salhouse Broad'. The policies later on seek to improve access but the assessment on page 10 says there is easy access. This may need clarifying in the next version of the Plan. • Page 11 – would it be helpful to give the percentage of those who own one car or
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	<p>more?</p> <ul style="list-style-type: none"> • Page 13. Objectives – the Plan refers to Salhouse Broad being one of the key natural assets of the area. Should there be a related objective? • Page 13, final objective. On page 11 the Plan talks about fibre optic being recently installed but objective 8 seeks to improve broadband. Does this need clarifying? • Page 15, bottom of second column. Do you mean 'to generally'? It is not clear what the message of the sentence regarding habitat management is. • Page 15 last column regarding buses. It is not clear what the message is regarding buses here. • Throughout the document you use the term 'natural heritage'. I think you mean the natural environment? Heritage tends to be linked to heritage assets and the historic environment (historic buildings etc) whereas a term like natural environment could be better to relate to what it seems the plan is trying to achieve. <p><u>Policies</u></p> <ul style="list-style-type: none"> • It might be useful to make the policies more obvious and stand out better. Perhaps a box around them might help. • I suggest a justification for each policy rather than a general one for a series of policies. The policies are going to be used by Development Management Officers at the Broads Authority and Broadland Council who have not been involved in their formulation so explanation for each policy is important to help them use the policy the way it is intended. • Maps are a useful way of showing the areas to which the policies apply. There are currently no maps in the document. • The word 'should' is not a strong word. How important are some policy elements to you? Is 'should' adequate or are other terms like 'required to', 'need to', 'must', 'are expected to' better? • Page 16 – middle column. Last sentence of first paragraph. I do not understand this sentence. Who or what is the regulator? • Policy OE1. The phrasing and emphasis of this policy is confusing. The policy is worded negatively it seems. The approach of OE4 is more positive saying what will be protected then saying what will be acceptable. You may wish to consider rephrasing this policy along the lines of OE4. Should the plan outline on a map areas where the Parish would like to see new green space or natural heritage? Regarding 'impact is temporary and can be restored back to original condition' - the intent is not clear. It could be interpreted that only temporary development is allowed in the Parish as if a permanent dwelling for example is put in place then the impact will be permanent. • OE2 – some natural environments might be designated as SAC, SPA or SSSI so care may be needed in making these areas more accessible for local people as this increased recreational use may affect the special features. • What is the difference between OE1 and OE2? They seem to have the same intent. Could they be combined? • OE3 – What about security lighting or other lighting put up by residents/businesses? Some lighting might be ok if it points downwards so it does not contribute to sky glow. • OE4 – village landscape or parish landscape? It is not clear to what area this policy applies. • OE5 – does this depend on where they are located? For example, open space, sports fields, village greens and allotments are places where people go so do these
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	<p>need to be close to or within settlements? 'Pony paddock' could be better phrased as 'equestrian'.</p> <ul style="list-style-type: none"> • OE6 – what are the 'important features of value in the village'? How will we know if proposals affect these? • OE7 – I think this relates to transport only, but by using the term 'carbon footprint' it could mean that homes should be energy efficient. Is 'carbon emissions from transport' a better term? • EMP1 – is there a map allocating this area for the purpose of this policy? Permitted Development may apply in some cases. There are some exemptions to Permitted Development however. Please get in touch if you wish me to clarify this. Is financial viability a consideration for this policy as a business may close due to not being viable? 'Elsewhere' – where is acceptable? Should there be a map? • MP2 – are these permitted anywhere or within settlement limits for example? Should it be called 'EMP2'? • Housing policies – In general I will leave Broadland Council to consider these policies but offer the following comments: <ul style="list-style-type: none"> ○ Do you wish to identify areas for housing through the Plan? ○ H3 – how far out of the settlement limit? Or do sites need to be adjacent to the settlement limit? You may wish to discuss this approach with Broadland Council Planning Policy Officers as the NPPF generally presumes against isolated dwellings. See NPPF 55. Why can sites for sheltered houses have more than 5 dwellings when other sites cannot? ○ The limit of 5 dwellings requirement. It could see five dwellings squeezed on a site that is too small or limit a larger site to five, which could accommodate some more dwellings. • Projects: as mentioned above, another project could be to assess the darkness of the skies. <p><u>Sustainability Appraisal</u></p> <p>There could be some more positives as a result of the plan. Some suggestions and reasons are below:</p> <p>ENV4 – positive against most of the OE policies.</p> <p>SOC3 – EMP policies could be positive here as with employment comes skills.</p> <p>SOC10 – positive against OE6 and OE7. This SA objective could relate to OE5 if located with settlements as per our comment above.</p> <p>ECON5 – positive against the EMP policies</p> <p>Other comments:</p> <p>ENV2 – see above re the term 'natural heritage'. As written, it is not clear how the policy will address water quality.</p> <p>ENV2 in the summary table has colours in but there is no description in the detailed table.</p>
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