

Planning Committee

08 October 2021

Agenda item number 13

Consultation Responses

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's proposed response to planning policy consultations received recently, and invites members' comments and guidance.

Recommendation

To note the report and endorse the nature of the proposed response.

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 comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 21 September 2021

Appendix 1 – Planning Policy consultations received

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Document: Lound with Ashby, Herringfleet and Somerleyton Neighbourhood Plan 2014 to 2036 www.eastsuffolk.gov.uk/neighbourhoodplanning

Due date: 13 October 2021

Status: Regulation 16 consultation

Proposed level: Planning Committee endorsed

Notes

Lound and Ashby, Herringfleet & Somerleyton are adjoining parishes in the north of Suffolk. Early in 2016 the two parish councils agreed to work together to develop a joint Neighbourhood Plan. A steering group consisting of residents and parish councillors was set up to lead the work. Local residents accept that there needs to be some development in the parishes in order to maintain the communities, but they are keen to preserve the rural image and not have the area transformed by inappropriate development. The Neighbourhood Plan will enhance the lives of residents of all age groups in Lound, Ashby, Herringfleet and Somerleyton by protecting the rural identity, the scenic beauty, the Broads and the balance of built and natural landscape and tranquillity.

This is the final consultation stage before the plan is submitted to an Examiner for assessment.

Proposed response

Summary of response

The Neighbourhood Plan is welcomed. There is one main concern and that relates to the plan saying where employment development can go, which seems contrary to Waveney Local Plan and could impact on the setting of the Broads. Other than that, there are some areas that would benefit from being clearer. Some factual issues are also identified.

Proposed comments

Neighbourhood Plan

Issues relating to Basic Conditions

LAHS9 seems to be contrary to policy WLP1.2 of the Waveney Local Plan as it refers to employment land outside of settlement boundaries and WLP1.2 says that Neighbourhood Plans can allocate sites, but LAHS9 does not allocate and is general policy wording. East Suffolk Council may have thoughts on this. There is potential to affect the setting of the Broads, if there is development beyond the settlement boundaries that is not controlled or guided by specific policy and criteria. This seems to be related to Basic Condition E as it does not seem to adequately reflect the Waveney Local Plan.

Issues relating to delivery of policies/how they can be used in decision making

Policy LAHS1 – by saying ‘preference will be given’ there is no real instruction or requirement there. If there is evidence and local desire for homes to be 1, 2, 3 bed then the policy needs to

be worded stronger. As written, it is not clear what the policy will achieve. What does 'preference' really mean? As a developer do I need to just say 'I can make more money on one 5 bed house' and that will be accepted as ok? Do you want a more formal sequential approach? Do you want a more robust approach? We mentioned this at the Regulation 14 consultation.

7.4.6 – it is not clear what this paragraph seems to be saying has the same status as the design guide. And which policy sets out that these other documents need to be considered? 7.5.7 seems to continue to imply that the supporting evidence document has weight in decision making. It is not in the Plan however and as stated previously, there is no policy wording to say this is the case.

Policy LAHS4, last paragraph – not all applications need a design and access statement. Or is this policy requiring them all to complete one?

Para 9.2.4 – where is the site identified? In this Plan? In the Waveney Local Plan? In a planning application? LAHS7 does not allocate land for this use. The wording in 9.3.1 talks of a location, but that is not in a policy or on a map.

Factual changes:

The following comments are **factual** changes that are required to be made to the Neighbourhood Plan.

- Throughout – where is the OS licence for the maps used?
- Para 7.2.3 and 7.2.4 are the same. Seems to be repeated.
- 7.3.1 – following 7.2.2 and 7.3.4, this para should state that the design guide does not apply to the Broads (and this stance is supported as the Guide does not adequately assess the Broads and relevant documentation which could have resulted in different outcomes and the Neighbourhood Plan group are unable to change the document as AECOM produced it; it should be noted that if the guide applied to the Broads, we would have had to object in relation to Basic Condition E).
- The map on page 10 has a Neighbourhood Plan allocation shown. What is this? There does not seem to be an allocation in this Neighbourhood Plan. The map will need updating.
- Para 7.3.5 says: (although the Design Guide is related to allocated sites outside the Broads Authority area and **as such this area the Broads** has been excluded from the relevant policies LAHS4, LAHS5 and LAHS7). Recommend the changes in yellow are made to make this part clearer.
- LAHS3 says 'Local Plan polices WLP8.23 (Protection of Open Space) of the East Suffolk (Waveney) Local Plan and DM7 (Open space on land, play space, sports fields and allotments) of the Broad Authority Local plan'. But this is a fragment of a sentence. Perhaps it needs to end with 'are of relevance'?
- Para 8.1 - and the lakeside areas at Lound Waterworks along with the Broads Authority executive area.

Wording that is not in policy, but seems to be setting policy

It is not clear how a Development Management Officer can use these statements as they are not in a policy:

- Section 7.5 – these seem requirements for designing development, but they are not in a policy so it is not clear what weight they have. Is there a need for a design policy that refers to these criteria? Indeed 7.4.6 seems to be an instruction, to include the community when designing schemes, and would form part of a design policy.
- Section 8.1 – this has some criteria but they are not in a policy so it is not clear how the information in this section is intended to be used.
- Section 8.5 – this seems to be policy wording. But it is not in a policy so it is not clear what a DM Officer would do with it. Also, the Waveney and Broads Local Plans have policies on SuDS. How does this go further or say anything different to those policies?

Issues relating to formatting which need to be addressed

- Page 16, wording under title LAHS3 does not have a para number. Suggest that is added. We mentioned this at the Regulation 14 consultation.

Other comments

- Para 7.2.2 seems to imply that schemes of under 10 dwellings is favoured, yet acknowledges that the affordable housing policies will not be triggered. It is clear in the objectives of the Neighbourhood Plan that it is important to meet the needs of the whole community and attract younger people and enable the population to be more balanced. Is the text in the policy, apparently supported by the Design Guide, contradictory to the stated objectives of the Plan?
- Para 8.3.4 – is there a school travel plan? Could that perhaps be an action or project for the group? We mentioned this at the Regulation 14 consultation.
- Section 9.1 and 9.2 and 9.3.2 to 9.3.8 and 9.4 and section 11 seem to be background information with no related policy. It is not clear what the intentions are for the information in these sections.

Basic Conditions Statement

- As set out at the start of this representation, one part of the document does not seem to meet some Basic Conditions, for the reason set out in this representation.
- The NPPF 2021 has been released recently. Not sure how the Examiner would want to address how the NPPF is assessed in the Basic Conditions statement.

Character statement for Somerleyton Village

- 5.2 'Listed Landscape' do they mean Registered Parks and Gardens or Protected Landscapes? If the latter, they could mention that the western end of the Conservation Area (CA) is within the Broads Authority Executive Area.

- 5.4 / 5.5 could some description of the marina and boatyard area, part of which is in the CA be provided in the 'walk-through' description of the CA? It certainly has a distinct character that contributes to this part of the CA and its wider setting.
- They make various references to views across the Waveney Valley – should these be more descriptive and could the document make clear that these contribute positively to the conservation area?

Document: Norfolk County Council. Proposed Transport for Norwich Strategy

<https://norfolk.citizenspace.com/consultation/proposed-transport-for-norwich-strategy/>

Due date: 08 October 2021

Status: Draft

Proposed level: Planning Committee endorsed

Notes

Our proposed Transport for Norwich strategy provides the focus for setting out a shared vision for the future of transport in the wider Norwich area. This consultation will be an opportunity for anyone interested in this strategy to share their views on what Norfolk County Council is putting forward and to suggest other ways in which we could shape the future of transport in the area.

Proposed response

Para under 1.20 needs a number

Para 2.1 – River Wensum Strategy, Broads Integrated Access Strategy, Local Plan for the Broads – those documents need to be reviewed and mentioned here.

Para 9.4 – there is a new NPPF – 2021.

Chapter 13 - Not sure what the 'Broads Authority navigation issues' are. There is no further mention. Please feel free to contact us about this.