

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:	<ul style="list-style-type: none">• That the report be noted and the nature of the proposed response be endorsed.• In relation to submission of the Neighbourhood Plan, it is recommended that the Chief Executive in consultation with the Chair of the Authority and Chair of the Planning Committee is delegated to submit the Wroxham Neighbourhood Plan to independent examination on assessment of the comments received after the public consultation (publication) end, subject to no new issues being raised.

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 and/or guidance are invited.

2. Financial Implications

- 2.1 There are no financial implications.

Background papers: None

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Appendices: APPENDIX 1 – Schedule of Planning Policy Consultations received

Planning Policy Consultations Received

ORGANISATION:	Wroxham Parish Council
DOCUMENT:	Wroxham Neighbourhood Plan – Submission version
LINK	https://wroxhamplan.wordpress.com/about/
DUE DATE:	7 January 2019
STATUS:	Submission version – next stage is examination.
PROPOSED LEVEL:	Planning Committee endorsed
NOTES:	<p>This is the final stage of consultation before the Plan is examined. At the November Planning Committee, Planning Committee endorsed the Neighbourhood Plan for consultation. The comments below will form the Authority's response to the consultation.</p> <p>In relation to submission of the Neighbourhood Plan, it is recommended that the Chief Executive in consultation with the Chair of the Authority and Chair of the Planning Committee is delegated to submit the Wroxham Neighbourhood Plan to independent examination on assessment of the comments received after the public consultation (publication) end, subject to no new issues being raised.</p>
PROPOSED RESPONSE:	<p>Vision: 'special wildlife' could be added to the Vision for Wroxham 2038 in order to reflect and link to Objective 8. It would read as follows: 'Wroxham parish must remain a unique and beautiful waterside community. It will have a variety of good quality homes, improved community services, effective traffic management, and a range of businesses, developed in a way that are sensitive to its iconic location, <u>special wildlife</u> and the Conservation Area'.</p> <p>Page 8 – second paragraph says that the mean age of North Norfolk residents is comparable but older at 47.5 years... but that is younger than the mean age of Wroxham residents at 52 years. It is recommended that this paragraph is corrected to better reflect the situation.</p> <p>Page 10 – The revised NPPF has now been published and text could be amended to reflect this.</p> <p>Page 23 – where there is reference to flood risk, the Flood Risk SPD of the Broads Authority needs to be referenced: http://www.broads-authority.gov.uk/_data/assets/pdf_file/0006/917844/Broads-Flood-Risk-SPD-Final-March-2017.pdf</p> <p>Page 24, footnote 11. The NPPF 2018 is now in place. To avoid confusion and to future proof the Neighbourhood Plan (and we acknowledge that submission of the Plan is within the transition arrangements of the 2018 NPPF) it is strongly recommended that 'small scale' definition is aligned with the definition of major development in the 2018</p>

	<p>NPPF. The policy would then perhaps be 9 or less as major development is defined as ten or more.</p> <p>Page 25 and Appendix B – there are no instructions to Development Management Officers about what to do with these design standards. There is no mention of them in HBE2. Should the design standards be included in the policy?</p> <p>HBE1:</p> <ul style="list-style-type: none"> • The requirement for residential development to not be holiday homes seems to be in conflict with some of our policies such as DP14, DP15, DP18, DP21 of the Development Management DPD (which are rolled forward and amended slightly in the emerging Local Plan). These policies say that tourism use is preferred and set tests for market residential in these areas. This is of concern to the Broads Authority. <p>HBE2:</p> <ul style="list-style-type: none"> • Our emerging Local Plan policy referred to lifetime homes, but Waveney Council pointed out that this has merged with the optional building regulations standard M4(2) which our emerging policy includes as a requirement. No particular request from the Broads Authority, just sharing that we will not refer to lifetime homes in the Local Plan. • Would ‘smaller retirement properties’ meet the government’s guidance on technical housing standards? Could this policy result in cramped design? Perhaps smaller needs to be better defined. Would the Neighbourhood Plan want to incorporate the guidance below (potentially for all residential development) https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard - to be taken into account this guidance needs to be adopted in plans. Criterion e might be better if worded smaller retirement properties designed <i>specifically</i> for downsizing. – This would make the second sentence more relevant. • How is it proposed to prevent the smaller homes being extended? – removal of PD rights would be required; we have mentioned this before. <p>HBE3:</p> <ul style="list-style-type: none"> • Would recommend amending to something like ‘<i>Have substantial <u>and diverse tree planting throughout, appropriate to the locality.</u></i>’ • (j) May benefit from being worded more positively. • Specify when Design and Access Statements are required as part of applications as this policy states where appropriate, and pre-ambule states that “the Conservation Area Appraisal should be referred to within all planning application regardless of the scale and location within Wroxham parish”. The PPG doesn’t require Design and Access Statements for all applications, and this policy seems to suggest this is required in all planning applications, even outside of the Conservation Area. • This policy does not have any mention of either future occupants’/or neighbours’ amenity being protected. This might seem implicit in dealing with housing,
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however an explicit policy, particularly linked to future occupant amenity, which can often be overlooked due to other considerations of residents etc already living in the area.

- Does the reference to holiday accommodation in first para conflict slightly with aspiration of HBE1?
- Criterion c – will the preferred method of achieving additional development - “infilling” which is identified earlier in the document conflict with this?
- Criterion f – should this read maintain “the” village character instead of “a” village character?
- Criterion g is in part (if not wholly) achieved by the implementation of criteria c and d.

Page 26, last sentence of last paragraph. Not sure this is meant to be in the Neighbourhood Plan as worded as it seems a verbatim request from Norfolk County Council.

HBE 4 - is the statement required in addition to a design and access statement and or Heritage statement?

BUS1: The emerging Local Plan for the Broads will have a generic retail policy. North Norfolk Local Plan is likely to have a retail policy in their Local Plan that reflects evidence on retail. Broadland will probably have a retail policy in the emerging Greater Norwich Local Plan. Strongly recommend that this retail policy (BUS1) acknowledges the NPPF section on retail about town centre first as well as the potential for impact assessments and also potential for any locally set threshold of the impact assessment. How would a small scale hot-food proposal in line with the other criteria of the policy harm the character of the village?

Page 33 – happy for the Neighbourhood Plan to quote our Local Plan in relation to live work units, but perhaps make the text more general. The text is taken from a policy about one specific development of live/work units that have all these things (like off road parking and moorings) – not all live/work units will be like that and by using that wording, it implies that all live/work units need to have all those things. Much of the quote can be used as it talks about the benefits of such uses, but a verbatim quote does not seem to make sense.

Both policies BUS3 and ENV3 say that something will not be ‘encouraged’. This wording does not work in policies. Usually ‘will not be supported’ is used and has meaning in such policies. It is not clear how Development Management Officers can encourage or not encourage something. Using the word ‘support’ is a clearer direction. We have raised this before.

BUS3:

- What is small scale? This needs to be explained so the Development Management Officers know how to apply the policy.

- Where it says ‘Do not displace a potential residential or other business use’ how will that be judged as this test is not set out? It is not clear how Development Management Officers will be able to apply this part of the policy.
- Last bullet point – there is an and/or and this makes the intentions of the policy not clear. There is another policy relating to car parking so it is not clear why that is mentioned in the policy. How will a Development Management Officer apply this part of the policy? We have raised this before.
- Is the policy not slightly contradictory with the clear desire for residential over holiday expressed earlier in the document.

COM1:

- In addition to aesthetics, consideration needs to be better given to species diversity, wildlife benefit and ease of maintenance. We have raised this before.
- Is there scope to address objective 6 Walking and cycling into design of these gateways as well?

COM2: as part of the examination into the Local Plan, we have revised our wording in relation to PUBDM43: Visitor and community facilities and services. The changes we propose may be of relevance to the Wroxham Neighbourhood Plan. These are listed below. Please note that they are yet to be endorsed by the Planning Inspector. Note in particular the first one; our approach was a bit too permissive and we wonder if the Wroxham Neighbourhood Plan’s approach is too? See table at the end of this response.

Page 41 – there is reference to the impact on congestion of through traffic, but nothing about car trips originating from Wroxham. We have raised this before.

Page 42/TRA1 – we note the reference to support for a relief road, but that no firm proposals or alignment are suggested. We are not aware of a budget for this in the Highways Authority’s forward programme or any feasibility work having been recently undertaken, so note that this is likely to be an aspiration. This is likely to be a difficult project to deliver, particularly without having a significant and adverse impact on the character and quality of the area and the level of development required to fund it would be likely to be very substantial.

TRA1 a): Is a proposal for one dwelling to be required to produce a transport assessment? To what size scheme is this requirement relevant to?

TRA1 and TRA3 seem to not address objective 6 in a strong manner. TRA1d is quite weak as it uses ‘encourage’ whereas TRA3 uses the word ‘must’ and is a bit stronger. How do these two policies work together? There could be scope for Objective 6 to be part of Objective 5.

ENV2: We note that one incidence of ‘open space’ has been changed to ‘Local Green Space’ and reflects our initial comment, but the third part of the policy refers to open

space. Note that the Greater Norwich Local Plan will have reference to open space and the Broadland District Development Management DPD has policy on open space. Note that the Broads local Plan will have a policy on open space too. So what does this add to those policies? Also it may be lost and not used by Development Management Officers as it is under a policy called 'Local Green Space'. Is this part better to be in the design policy?

P46 add the suggested final paragraph to provide detail on what these designations mean to the reader: ' Within these areas the Broads National Park has a quarter of the UKs species of conservation priority, with otter, bats, kingfisher and marsh harrier all visible within the neighbourhood'.

P49 there is little evidence, or examples in this plan of how further development in Wroxham provides an opportunity to enhance biodiversity through the creation of ecological networks. Could this be expanded upon?

P49/50 The reference to two County Wildlife Sites makes it sound as if Norfolk Wildlife Trust is responsible for the management of these sites. Amend to say that the landowner is responsible.

ENV3: Bio-diversity policy could be expanded to include the examples (integrated nesting boxes within buildings, native hedge planting for boundaries, flower-rich meadow areas), and therefore be more similar to ENV6: Climate change. The policy does not really say anything as worded. We have raised this before.

ENV4 – confused by 'in addition to those identified in the Wroxham Conservation Area Character Statement' – are you saying there are other important views? For ease of use by Development Management Officers as well as to be clear in the intentions of the policy all important views need to be included rather than a reference to another document. We have raised this before. Defining these views is useful but the photos could do with being bigger to be easily understood.

Page 51 please amend the following so it is a better reflection of the situation. We have already requested this change but it has not been made. 'The Broads Authority has management plans to deal with invasive non- native species. Care should be taken that development does not contribute to the spread of these plants and animals.' To this suggested version: 'The Norfolk Non-Native Species Initiative, which include the Broads Authority, provide advice to landowners. It is the responsibility of landowners to prevent invasive non-native plants on their land from spreading into the wild and causing a nuisance. Care should be taken that development and associated use activities do not contribute to the spread of these plants and animals.'

Appendix B:

- point 4 typo: '5' after research.

Page 60 states in the character area 5 that Beech road terminates with views across privately owned meadows to the Broad - Is this correct?

Page 61 character area 6 second bullet refers to "at the southern end" should "of the Avenue" be added here for clarity?

Appendix C only describes what is there now. It does not state the kind of characteristics that are important to the area that should be protected or enhanced. It is not clear how Development Management Officers will use Appendix C. We have raised this before.

The Authority requests again that the final plan has paragraph numbers and bullet points in policies are numbered. This document will be used by Development Management Officers and such referencing is important when decisions refer to policies. It is a simple formatting change with great benefits.







The term 'should' is used throughout the plan. It is a weak word and the test or requirement to which it relates can be easily ignored as a result. Wording like 'needs to' or 'must' is much stronger. We have raised this before.









We are aware that there are intentions to expand the cemetery but this is not mentioned in the Neighbourhood Plan and there is no policy relating to it such as an allocation. It is not clear why the cemetery extension site is not included in the Neighbourhood Plan.

Page No. (From Broads Local Plan Pre- Submission)	Policy/ Para. No. (From Broads Local Plan Pre- Submission)	Proposed Change to Local Plan	Reason for change
124	PUBDM43	<p>Applications for the change of use or redevelopment of an existing community, visitor or recreational facility or service that meets a local need or contributes to the network of facilities through the Broads will only be permitted where:</p> <p>a) It can be proven that there is no community need for the service/facility; or</p> <p>b) It can be demonstrated through a viability assessment that the current use is economically unviable. and</p> <p>c) Details of consultation with the community regarding the change of use of redevelopment are provided; and</p> <p>d) There is an equivalent facility available or one is made available prior to the commencement of redevelopment, to serve the same need in an equally accessible and convenient location.</p> <p><u>In all instances, details of consultation with the community regarding the change of use or redevelopment need to be provided.</u></p>	<i>Intended to make policy clearer. D removed as deemed too permissive and a and b allow change subject to no need and lack of viability being proven.</i>
125	PUBDM43 supporting text.	Furthermore, many of the employment generating businesses within the Broads serve visitors as well as the resident market, such as shops and pubs (<u>although pubs are not covered in this policy</u> , see policy PUBSSPUBS), and their loss can have a wider than local impact.	<i>To reflect Matter 8 e) by making the policy clearer. Note the propose formulation suggested in the response to Matter 8 e) has been amended in changes 153 & 154.</i>
126	PUBDM43 supporting text.	<p>Examples are:</p> <ul style="list-style-type: none"> Community facility – post offices, cemeteries (see policy PUBACL1 and PUBDM6), pubs (see policy PUBSSPUBS), libraries, village halls, shops, sports facilities (also see policies PUBDIT2 and PUBFLE1). <u>Please note that pubs are addressed in their own policy, PUBSSPUBS.</u> 	<i>To reflect Matter 8 e) by making the policy clearer. Note the propose formulation suggested in the response to Matter 8 e) has been amended in changes 153 & 154.</i>





ORGANISATION:	Greater Norwich Local Plan
DOCUMENT:	Greater Norwich Local Plan – extra sites consultation
LINK	<ul style="list-style-type: none"> • Introduction • Settlement Summaries and Sites • Broadland • Norwich • South Norfolk
DUE DATE:	5pm 14 December
STATUS:	Extra sites consultation – Regulation 18 consultation.
PROPOSED LEVEL:	Planning Committee endorsed
NOTES:	<p>The current consultation covers newly submitted sites, revisions to some of the sites already consulted on in January and small sites. Altogether, this comes to more than 200 sites.</p> <p>The sites in the tables at the end of this response are of particular interest. Click on the globe symbol to see the site on a map. Slick on the pdf symbol to find out more about the site.</p>
PROPOSED RESPONSE:	<p>See table that follows for sites that are near to or hard up to our border, a summary and the proposed comments. The globe symbol can be clicked on and this takes you to a map. More information can be found by clicking on the pdf symbol.</p> <p>A general comment that seeks to ensure that the Broads Authority are involved in producing policies relating to site allocations near to our border will also be submitted.</p>



These sites are close to our border...

Settlement	Links	Ref No.	Details	Assessment	Comments
Acle	 	GNLPO421R	Housing of approx. 150 units with open space	Site is 200m from Broads area with intervening development at Damgate, including residential and commercial, and no public views into site from Broads. Potential for run off from site would need to be managed, as site drains towards Broads. Potential to improve screening. Site has existing habitat corridors within and on its boundaries. The proximity to designated wildlife sites of international importance results in significant potential for biodiversity use and thus the need for protection and enhancement. Unlikely to impact adversely on Broads in terms of heritage.	No objection subject to satisfactory drainage and run off management and protection of existing and enhancement of habitat corridors to link to the nearby Broads habitats. Additionally consideration needs to be given to the provision of walking and cycling routes for residents to get to Acle and facilities/schools etc. there.
Acle	 	GNLPO2139	Residential development (unspecified number) plus school extension	Site over 500m from Broads. Separated by roads and screened by intervening development. Linkage to and extension of Acle Land Trust wooded area to be planned within site layout. This will provide recreation and biodiversity opportunity. Unlikely to impact adversely on Broads in terms of heritage.	Opportunity to mitigate through planting and habitat corridor. Adequate green open space and green infrastructure should be designed into this scheme particularly pedestrian and cycle routes providing access to Acle and the rights of way network leading to Upton with Fishley.
Coltishall	 	GNLPO2072	Residential development of 15 dwellings	Assessment: Site some distance from Broads, across Church Street and Church Close and screened from Broads area by existing development (mainly residential) and tree line to rear of Church Close. Within Conservation area and adjacent to a LB but in BDC's area, unlikely to impact adversely on Broads in	No comments

				terms of heritage.	
Reedham	 	GNLP2151	Residential development for 6 dwellings	Site is 150m from Broads area, but is infill plot within existing line of development. No visibility from public viewpoints Broads and views across locate site within existing building line. Unlikely to impact adversely on Broads in terms of heritage.	No comments
Rockland St Mary	 	GNLP2007	Residential development for 15+ dwellings	Site directly opposite Broads boundary, though separated by highway. Site would be extension to existing line of development and function as village extension. No significant new impacts on Broads, although development would consolidate and reinforce existing impacts. Screening and planting could mitigate this, but habitat corridor should be provided. Thought should be given to the design of the dwellings to achieve a positive extension to the built form of the village. Unlikely to impact adversely in terms of heritage.	No significant impact on Broads, so no objection, however effect of extension should be mitigated through planting and habitat corridor provided. Design – form, mass, scale and density will be an important consideration.
Woodbastwick	 	GNLP2180	Residential development of 5 dwellings	Site is 50m from Broads area, but separated by B1140 and existing development which provides screening. Unlikely to impact adversely on Broads in terms of heritage.	No comments
Wroxham	 	GNLP2135	Residential development of 100 dwellings	Site is extension to existing new development and remote from Broads, with no visibility from Broads area. Unlikely to impact adversely on Broads in terms of heritage. Suggest that pedestrian cycle access from Salhouse Road and along Salhouse Road should be provided	No comments

These sites are right up to our border

Settlement	Links	Ref No.	Details		
Brundall	 	GNLP2177	Residential development of 6 dwellings	Site adjacent to Broads boundary. Proposal would extend development behind existing line of development and up to Broads. Landscape is farmed and semi-rural to railway, beyond which a more typical Broads character develops. Extension and intensification of development up to Broads boundary to be resisted on grounds of encroachment, cumulative erosion of boundary character and impact on biodiversity, water flows and drainage. This development will extend the built form right up to the Broads boundary and into a landscape buffer between Brundall and the Broads. Not appropriate in design terms.	Objection
Norwich Riverside etc	 	GNLP2137	Mixed use development including residential, offices, increased leisure and recreational activities, hotels and retail	Site is adjacent to Broads boundary which is formed by the River Wensum here. The site is a major mixed use development dating from the 1980s, but which has a poor relationship with the river. There are opportunities here to improve the relationship and the public realm. Unlikely to impact in heritage term.	There are opportunities here to improve the relationship between the development, river and and the public realm. Virtually the entire site has turned its back on the river and the public realm has suffered as a consequence. This could be enhanced significantly by working with the developer and the City Council. Opportunity for interpretation exists both of the river frontage and historic uses but also Kings street and the numerous listed Merchants houses and their relationship with the River.

Settlement	Links	Ref No.	Details		
Norwich	 	GNLP0409R	Residential-led mixed use development with some retail	<p>Site is adjacent to Broads boundary which is formed by the River Wensum here. This is a brownfield site which has previously been identified for comprehensive redevelopment, which has commenced in part. There are opportunities here for place making and improvements to the public realm, as well as reinforcing the character of the riverside. Design – form, mass, scale and density will be an important consideration. Unlikely to impact adversely on Broads in terms of heritage.</p>	<p>There are opportunities here for place making and improvements to the public realm, as well as reinforcing the character of the riverside. Again significant opportunities exist at this site to enhance the public realm. Particularly through provision of a riverside walk. Wwould also like to see open space at the riverside rather than having buildings constructed close to the bank. Would also like to see a feature made of the medieval city wall with open space in that area providing a link to Barrack Street.</p>