

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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Appendices: APPENDIX 1 – Schedule of Planning Policy Consultations received from North Norfolk District Council

Planning Policy Consultations Received

ORGANISATION:	North Norfolk District Council
DOCUMENT:	Draft Local Plan Draft Landscape Character Assessment SPD Draft Landscape Sensitivity Study SPD Draft Design Guide
LINK	https://www.north-norfolk.gov.uk/tasks/planning-policy/document-library/
DUE DATE:	19 June. Extension agreed to allow this report to be considered at Planning Committee.
STATUS:	Draft
PROPOSED LEVEL:	Planning Committee endorsed
NOTES:	<p>The Local Plan explains where, how, and how much new development should take place in North Norfolk between now and 2036. It proposes up to 11,000 new homes including 2,300 affordable homes, new employment land, protected areas of green space, and a range of new policies guiding development proposals relating to housing construction standards, design of development, renewable energy, coastal management and much more.</p> <p>As part of this consultation we will publish details of the Alternative Options that have been considered, along with the supporting documents that we have taken into account when preparing the Plan, including: Interim Sustainability Appraisal (SA) and the Interim Habitats Regulations Assessment (HRA).</p> <p>NNDC have updated the North Norfolk Design Guide which is now a comprehensive on-line resource and has been prepared as a first point of call for all design matters. The Guide will be a Supplementary Planning Document (SPD) and is an integral part of the Local Plan. The guidance contained will be used to help determine planning decisions and will be given significant weight during planning application and appeal processes. NNDC have also produced new Landscape Character & Sensitivity Assessments which the Council intends to adopt as Supplementary Planning Documents (SPDs). These documents represent the most up to date and accurate assessment of the landscape characteristics in North Norfolk and have assessed the sensitivity of North Norfolk's landscape to various types of renewable and low carbon development.</p>
PROPOSED RESPONSE:	<p><u>General</u></p> <ul style="list-style-type: none"> • The documents seem generally well thought out and well presented and clear. • Regarding the consultation, we appreciate the extension agreed to enable Planning Committee to ratify the response. • It is disappointing, however, that the consultation period was only 6 weeks. The consultation covered 4 documents, which amount to over 1200 pages, and it is considered that 8 or 9 weeks would have been more appropriate. Also note that one of the weeks of the consultation was school half term and perhaps another week could have been added even just to reflect that. <p><u>Local Plan 1</u></p> <ul style="list-style-type: none"> • Throughout: Would prefer 'Norfolk and Suffolk Broads' or just 'Broads'.

- Section 4: Perhaps this section can mention the Broads. Although, of course, not covered by this Local Plan, the Broads is still an asset to North Norfolk like the AONB mentioned in 4.6. We note the Broads is mentioned in the vision. What happens outside the Broads can impact on the Broads.
- 5.11 to 5.15 – again, whilst acknowledging that the Broads are not part of the area covered by this Local Plan, the Broads is part of North Norfolk and are an asset and the Broads should be referred to in this section especially 5.14. We note the Broads are mentioned in the vision.
- Policy SD2 – does it matter that 4c uses the terms ‘long -term’ and ‘perpetuity’? Are these meant to be the same or different time periods?
- 7.27 – needs to mention the Broads.
- 7.54 – the last sentence does not read well.
- SD6 part1 –We had something in our Publication version [PUB43](#) d that is similar to SD6 1. The Inspector discussed this at the hearings and requested we take it out as it was too permissive. See our adopted [DM44](#).
- 7.58 – needs to mention the Broads.
- SD7 – is para 3 (in the case of...) actually allocating land for wind power?
- SD9, 2 – needs to mention the Broads. It is mentioned in the final paragraph so mentioning it here would be consistent.
- 7.101 and 7.102 and SD13 – parts of NNDC area in the Broads are good or very good dark skies as referred to in [DM22](#) of our Local Plan and shown at Appendix I of our Local Plan and [here](#). Please mention this in these sections of the Local Plan. What happens outside the Broads can affect the Broads as per 8.10.
- I have not seen mention of the Horning Knackers Wood Water Recycling Centre capacity issue or mention of the Joint Position Statement. Our webpage relating to this is [here](#).
- SD16 – could electric charging points be lit? Boat electric points tend to be. If they are lit, this could add to light pollution.
- Section 8: As this is a planning document, suggest you say that the ‘Broads has a status equivalent to a National Park’ or that the ‘Broads is a member of the National Park family’ rather than ‘Broads National Park’.
- ENV1 – our special qualities are listed in 7.4 of our Local Plan if that helps. DM1 is our Major Development policy. Might be helpful to refer to these? https://www.broads-authority.gov.uk/data/assets/pdf_file/0007/1571299/FINAL-Local-Plan-for-the-Broads-May-2019-Appendix-1-ba170519.pdf
- ENV2 – what are the settlement character studies referred to in this report?
- ENV1 and ENV2. Some of the wording in ENV2 is quite strong compared to ENV1 that says impact on special qualities ‘will be carefully assessed’. But there is no instruction to developers to ‘demonstrate that their location, scale, design and materials will protect, conserve and, where possible, enhance....’ as written in ENV2. Assessing something is different to protecting, conserving and enhancing it. So ENV1 seems weaker than ENV2. How do ENV1 and ENV2 work together? Do they repeat each other or complement or contradict each other?
- Figure 5 could helpfully show the Broads.
- 8.23 – is the Landscape Character Assessment date correct? Should it be 2019? Could refer to [Broads Landscape Character Assessment](#), [Broads Landscape Sensitivity Study](#) and [Broads Biodiversity Action Plan](#) too.
- ENV4: is ‘should’ a strong term? Could it say something like ‘are required to’ or ‘shall’? ENV5 for example says ‘will’.

- 8.80, 8.81, 8.82 – also mention the Broads and dark skies – we have intrinsically dark skies and a light pollution policy (DM22).
- 8.89 – might need to refer to shared Conservation Areas with us at Ludham, Horning, Stalham and Neatishead.
- Section 9 – whilst a small amount, do you want to have a paragraph about the housing need in the Broads’ part of NNDC? Our inspector asked us about lapse rates – you may want to consider these.
- Page 64, Affordable Housing – suggest you mention that the Broads Authority defers to/refers to/has regard to policies of NNDC in relation to Affordable Housing.
- Figure 6 – please show the Broads Authority Executive Area on this map as we will apply this policy.
- HOU4 – we have an equivalent policy that has just been found sound that might be of interest: DM38. https://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/1571299/FINAL-Local-Plan-for-the-Broads-May-2019-Appendix-1-ba170519.pdf
- HOU6 – again we have a residential ancillary accommodation policy that has just been found sound and might be of interest: DM39. https://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/1571299/FINAL-Local-Plan-for-the-Broads-May-2019-Appendix-1-ba170519.pdf
- ECN2 – Neatishead airbase is quite close to the Broads. We would appreciate reference to this and something about involving us early on in the process.
- 10.25 – suggest you say ‘Hoveton Town Centre spans Local Authority boundaries and part falls under the Broads Authority Administrative Area’.
- 10.46 – needs to mention the Broads.
- ECN6 – when you say ‘static caravans’ do you mean those used for holiday use or for permanent residential use? You might want to state which.
- Figure 10 – I cannot see the public car park on there – this is mentioned in the key
- Page 22 – think there is an issue with formatting.
- Figure 17 – needs to show the Broads, like Stalham and Hoveton maps do.

Local Plan 2

- Show the Broads on relevant maps (Ludham, Hoveton and Stalham)
- ST17 – we support the reasons for not taking this site forward.

SA Scoping Report

- Page 37 – no mention of Horning Knackers Wood Water Recycling Centre capacity issues and the [Joint Position Statement](#).
- Page 38 – refer to dark skies and the Broads, our assessment and map.
- 6.4.1 – other documents to assess are our [Broads Landscape Character Assessment](#) and [Broads Landscape Sensitivity Study](#)
- Map 4 – add Broads Authority area too?
- Map 23 – would you like to list our local list in your area too? Please get in touch if you do.
- 6.5.1 – should the Norfolk Health Protocol be listed here?
- 6.6 – did you want to mention our housing need in NNDC?
- The hyperlinks probably all work, but some are not displayed well.

Interim SA

- Page 117, table 6:
 - HOU4/SD16 – seems like it should be negative as these houses will be in areas isolated from sustainable modes of transport – that is why they have their own policy. An occupier would probably rely on the private car to get to key services.
 - SA3 is often negative and it says that all new development will have some kind of impact, but this is not consistent. For example, should ECN2 and ECN3 therefore rate negative for the same reasons?

Landscape Character Assessment

- 1.5 says: ‘the eastern end of the District also adjoins The Broads, which has the status of a National Park’. This is not quite right. The eastern end of the District ***is the Broads*** and the Broads has a ***status equivalent to a*** National Park.
- 1.10 – this needs to mention the Broads – the Broads is an asset to North Norfolk
- The maps at the start – you could include the [Broads Landscape Character Assessment](#) by copying over the maps.
- 3.9 and 3.10 – this needs to mention the Broads
- Figure 3.7 – you could include our dark skies map as well and it is [here](#).
- Figure 4.1, 4.2 seems to exclude the Broads. LUC did our [Broads Landscape Character Assessment](#) and the information from that could be incorporated. To have a blank for the Broads is misleading and may have impacts as and when applications need to be considered in landscape terms near to the Broads. You could mention our LCA and refer to that rather than leaving a blank and include a link to the document. You could use a colour symbol and then provide the reference to our LCA in the legend?
- Page 131 – bottom left photo seems to have a formatting error

Landscape Sensitivity Study

- Executive Summary, particularly page 6, does not mention the Broads and needs to. Development outside of the Broads can impact on the Broads.
- 1.3 needs to mention the Broads.
- 2.4 says: ‘the eastern end of the District also adjoins The Broads, which has the status of a National Park’. This is not quite right. The eastern end of the District ***is the Broads*** and the Broads has a ***status equivalent to a*** National Park.
- Figure 2.2, 2.4 seems to exclude the Broads. LUC did our [Broads Landscape Character Assessment](#) and the information from that could be incorporated. To have a blank for the Broads is misleading and may cause issues as and when applications need to be considered in landscape terms near to the Broads. You could mention our LCA and refer to that rather than leaving a blank and include a link to the document. You could use a colour symbol and then provide the reference to our LCA in the legend?
- 2.18 and 2.19 – needs to include the special qualities of the Broads in a similar way to the AONB section does. See b7.4 of our Local Plan.
- Table 5.1 only refers to the AONB. It has an ‘out of AONB’ column. It needs to have an ‘out of Broads’ column.
- Section 5 does not seem to mention the Broads and needs to.
- The report needs to include parts of or cross refer to our landscape sensitivity study and it still needs to consider the setting of the Broads.
- Figures 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7 - seems to exclude the Broads. LUC did our

	<p>Broads Landscape Sensitivity Study and the information from that could be incorporated. To have a blank for the Broads is misleading and may have impacts as and when applications need to be considered in landscape terms near to the Broads. You could mention our LSS and refer to that rather than leaving a blank and include a link to the document. You could use a colour symbol and then provide the reference to our LCSS in the legend?</p> <ul style="list-style-type: none">• Section 5.2 needs to have a row for the Broads.• The Appendix 1 could have the Broads as an area copied over from our LSS or again cross referred. <p><u>Design Guide</u></p> <ul style="list-style-type: none">• Could usefully be a pdf as well.
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