

Planning Committee

3 July 2026

Agenda item number 13

Recent consultation responses- for information

Report by Planning Policy Officer

Summary

This report informs the Committee of the officer's response to planning policy consultations received and replied to since February 2026. This is for information.

Recommendation

To note the report.

1. Introduction

- 1.1. Appendix 1 shows planning policy consultation documents received by the Authority since February 2026 Planning Committee meeting, together with the officer's response. Many of these had been sent to Committee Members for comment prior to submitting the response.
- 1.2. The report is for information.

Author: Natalie Beal

Date of report: 27 April 2026

[Appendix 1 - Permitted Development Rights for Onshore Wind Turbines in England](#)

[Appendix 2 - Filby Neighbourhood Plan \(review\) Regulation 16 version](#)

[Appendix 3 - Design and Placemaking Planning Practice Guidance Consultation](#)

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Appendix 1 - Permitted Development Rights for Onshore Wind Turbines in England

Department for Energy Security & Net Zero

Document: [Permitted development rights for onshore wind turbines in England: consultation document - GOV.UK](#)

When sent to Members: 7 April 2026

Due date: 10 June 2026

Proposed level: Was endorsed by Members by email.

Notes

This consultation seeks views on proposals to introduce a new permitted development right (PDR) for small-scale, non-domestic onshore wind turbines in England. The aim of the proposed PDR is to support the deployment of low-impact, small-scale renewable energy infrastructure by increasing planning flexibilities for non-domestic contexts, such as businesses, farms, and public sector organisations, while ensuring appropriate safeguards are in place to manage potential impacts. Key elements of the proposal and relevant consultation questions are outlined in Table 1 below (Questions 1-12). In addition to this proposal, this consultation explores the interaction between the proposed PDR and Environmental Impact Assessments [footnote 3] (Question 13).

The government is not proposing changes to the existing PDRs for turbines in homes and gardens due to concerns over their effectiveness in domestic settings and the potential for inappropriate developments. However, we would welcome views on whether improvements could be made (Question 14).

We have also considered whether PDRs could be applied in other settings such as for repowering or community energy projects. We are not proposing to introduce a new PDR in these contexts due to higher potential impacts and limited suitability to these types of developments. However, we welcome views on whether changes to the planning system could further support these projects (Questions 15, 16 and 17).

The final questions provide a space to add any further comments about the proposal or to provide further evidence on small-scale wind turbines and their impacts (Questions 18, 19 and 20).

Response

Eligible contexts

1a. Do you agree that a new PDR should be introduced for a wind turbine in non-domestic settings?

Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Without the planning application route, the impact on the setting of protected landscapes may not be considered.

Number of turbines

2a. Do you agree that this PDR should be limited to a single turbine within the boundary of the curtilage?

Yes. Anything more would benefit from considerations made during assessing planning applications.

2b. Please explain your answer.

More than one turbine will have different impacts than a single turbine and therefore assessment during the planning application process is required.

Additional or larger turbines

4a. Do you think that a PDR should facilitate the installation of larger turbines on a site

No. Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Allowing one turbine outside of the Broads is one thing but allowing more and larger is different. Without the planning application route, the impact on the setting of protected landscapes may not be considered. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

4b. Please explain your answer, including any evidence, examples or case studies that inform your view.

4c. What types of impacts (positive or negative) might arise from allowing larger turbines to be installed under a PDR?

Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Allowing one turbine outside of the Broads is one thing, but allowing more and larger is different. Without the planning application route, the impact on the setting of protected landscapes may not be considered. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

4d. Do you think that a PDR should facilitate the installation of multiple turbines on a site?

No. Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Allowing one turbine outside of the Broads is one thing, but allowing more and larger is different. Without the planning application route, the impact on the setting of protected landscapes may not be considered. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

4e. Please explain your answer, including any evidence, examples or case studies that inform your view.

4f. What types of impacts (positive or negative) might arise from allowing multiple turbines to be installed under a PDR?

Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. Allowing one turbine outside of the Broads is one thing, but allowing more and larger is different. Without the planning application route, the impact on the setting of protected landscapes may not be considered.

4g. If you answered 'yes' to Q4a or Q4d, are there specific criteria the policy could introduce to help determine when more than one turbine or larger turbines may be appropriate?

The impact on the setting of protected landscapes would be difficult to adequately address with PDR. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

4h. If you answered 'yes' to Q4a or Q4d, what criteria, safeguards, additional requirements or approaches should apply to ensure that the impacts of allowing more than one turbine or larger turbines could be effectively managed?

The impact on the setting of protected landscapes would be difficult to adequately address with PDR. We would suggest a further condition that the developer consults the relevant authority if the turbine would be potentially visible from a protected landscape or heritage site.

Excluded sites

5a. Do you agree with the proposed list of areas where the PDR will not apply?

Yes. We are pleased that the Broads is listed as it is a protected landscape and a member of the National Park Family. We also support the condition of exclusion and thus needing prior approval on PL's SSSI and within established SSSI buffer zone. There is no mention of siting carefully, to avoid migration routes and the most sensitive areas for nature, such as those frequently used by rare and threatened species. Will guidance be produced to support decision making?

Additional siting conditions

6a. Do you agree with the proposed additional condition to minimise visual impact on nearby heritage sites and important landscapes?

It is good that you have considered intervisibility, but we are concerned that there is a presumption in favour even where an impact is identified. Whilst article 2(3) land is excluded from the currently proposed PDR, the setting of protected landscapes is also a key consideration. We would suggest a further condition that the developer consults the relevant

authority if the turbine would be potentially visible from a protected landscape or heritage site.

6c. Do you think the proposed conditions are sufficient to prevent impacts from turbines installed on land nearby or adjacent to designated habitat sites?

What about impact on birds and bats outside of habitats sites – perhaps turbines en route to the habitats sites. So perhaps the impact on birds and bats needs to be a consideration on its own. Also, the impact of turbines on peat - there appears to be growing concern relating to locating turbines on peat soils. The concern being, generally, that constructing turbines on peatlands damages the peat and leads to increased drainage, both of which result in decomposition and carbon emissions.

Visual and environmental considerations

10c. Do you agree with the proposed condition on removal of the turbine and associated infrastructure when no longer needed?

If it is a PDR, how would this be enforced? Who would monitor that the site has been returned to its original condition? And what is 'as soon as practicable'?

10d. Please explain your answer.

Existing permitted development rights

14a. Do you think government should make changes to existing PDRs for small-scale turbines in domestic settings?

No, for the reasons set out in the introduction to the consultation document.

14b. Please explain your answer. If you have said yes, please include changes you think government should make.

Repowering and community energy projects

15a. Do you think government should introduce a new PDR for repowering projects?

No, for the reasons set out in the introduction to the consultation document.

16a. Do you think government should introduce a new PDR for community energy projects?

No, for the reasons set out in the consultation document.

Appendix 2 - Filby Neighbourhood Plan (review) Regulation 16 version

Filby Parish Council

Document: [Filby Neighbourhood Plan \(Review\) Regulation 16 Consultation - Great Yarmouth Borough Council](#)

When sent to Members: 24 February 2026

Due date: 20 March 2026

Proposed level: Was endorsed by Members by email.

Response:

- Para 11 – you need to mention the emerging Local Plan for the Broads and that it proposes a development boundary for Filby.
- In the vision, there are some words without spaces between them.
- Figure 2 – if new housing is **built**
- Repeating the title of the policies on different pages, if the policy goes over more than one pages, is a bit confusing. Suggest just one title. You highlight the policy well and that should be enough.
- Policy H1 part 1 – by the first sentence, I think you mean M4(2). I suggest you say that so there is no avoidance of doubt as to what you are referring to.
- Policy H1, part 2, first bullet point – the second part of the sentence is explanatory text.
- Throughout – number or letter bullet points in policies for ease of reference.
- Throughout – you might want to consider how to future proof the Plan against the emerging NPPF, particularly specific paragraph references – perhaps make them generic?
- Para 46 – the Broads Authority Design Guide is a SPD
- Para 58 – needs to reflect the Local Nature Recovery Strategy
- Para 62 – missing word? ‘Other biodiversity improvements **are** encouraged including planting or establishing suitable local habitats that enrich the population of local species’
- Para 63 – the reference in the 2019 Local Plan is SSTRI. The POSSTRI is from the Preferred Options version of the emerging Local Plan. Please amend.
- Policy E1 f – the Norfolk LNRS is completed and has been in place for a little while now.
- **OBJECTION** Policy E1 h – needs to refer to the need for habitats regulation assessment.
- Throughout – lots of words don’t have a space between them.
- Para 78 – this is incorrect. There are Local Green Spaces allocated in the Local Plan for the Broads – see policy SSLGS.
- Policy E3, last paragraph – is that more for supporting text?
- **OBJECTION** Policy E4 – para 81 is stronger in its requirement to fully justify the need for lighting in the first place than the policy. The first couple of sentences of that paragraph need to be included in the policy – the policy does not say anything about justifying the need for lighting in the first place.
- Para 90 – it is not clear what HOU3 of the GYBC Local Plan has to do with soils and BMV land.

- Para 91 – ‘may need to include an up-to-date agricultural land classification survey to determine land quality in accordance with current guidelines’ – is the Neighbourhood Plan saying these are needed or not needed? It is not clear what the purpose of this sentence is.
- Policy E5, third para, second sentence does not really make sense. Should it be: ‘Proposals affecting such land will only be supported where it is clearly demonstrated that the development is necessary, no reasonable alternative **for siting the proposed development on soils** of lower quality exists, and the benefits of the proposal significantly and demonstrably outweigh the harm’.
- **OBJECTION** Policy E5 – given that the plan often boasts of the Broads being in the parish, it is odd there is no mention of protecting the character and setting of the Broads given its status as equivalent to a National Park. Something like ‘protecting the landscape and setting of the Broads’ needs to be included in the policy.
- Throughout – when referring to how people travel to work, use Census 2021 with care due to lockdowns. The County Councils tend not to use that Census, instead using the 2011 Census.

Appendix 3 - Design and Placemaking Planning Practice Guidance Consultation

MHCLG

Document: <https://www.gov.uk/government/consultations/design-and-placemaking-planning-practice-guidance>

When sent to Members: 24 February 2026

Due date: 10 March 2026

Proposed level: Was endorsed by Members by email.

Response

General comments

- The front cover image and Figure 3, 5, 6, 7, 8, 9 are bizarre. The emerging NPPF talks about provisions for wildlife and even talks about supporting hedgehogs (N2 1f). Yet look at the back garden fences and there is nothing natural about them or indeed no access for hedgehogs – as referred to in para 93, second bullet point. I know this is an image, but you would have thought something like that would have been reflected in it. The image is actually sterile for wildlife – a token hedgehog or even a swift would be useful.
- Although the National Design Guide, and two part National Model Design Code are good and useful documents, having so many different documents to refer to is rather cumbersome and not very user-friendly and so the consolidation into one document is a good thing.
- Its good that the document is a visual one.
- General point: There is not sufficient information in relation to development in rural areas. For example, some of the diagrams should reflect how the principles contained in the document can be applied to development in rural areas.
- It is noted in policy CC3 of the draft NPPF that suitable mitigation against wildfires, including measures such as the incorporation of firebreaks, is to be required for sites adjacent to agricultural land, heathland or woodland (I have also noticed some of our Neighbourhood Plans are also now suggesting such measures). Please could this PPG provide some guidance on how these measures can be successfully incorporated into the design of developments and the wider environment?
- Figure 2 and para 17 – what about resilience to climate change? Para 52 mentions it, but it is not included here. Also not included in para 55. But is included in C3 and para 76.
- Para 41 – what is the update regarding M4(2) and M4(3) as per Government consultation in the last couple of years?

- Figure 8 doesn't really describe what is shown. It is presumed this is bin storage. Figure 13 for example says what it is showing.
- Page 5: It is stated that the MHCLG will be producing a series of model design codes and templates for LPAs to use. To date, guidance has (to some extent understandably) focussed on design codes in urban or masterplanning contexts. Could it be ensured that a model design code and template be provided for development in rural areas, where much smaller scale developments are more likely and there can be different considerations?
- Page 7, para 11: It is good to see the re-iteration of the NPPF policy that proposals that are not well-designed should be refused.
- Page 17, para 44 – its good to see some reference to rural areas.
- Page 18, para 46 – agree that front gardens should include planting to enhance the appearance but the document should also highlight the biodiversity benefits planting can bring. I'm not sure how the planting would be controlled? Is it expected that planners would insist on a planting scheme for new development that would be conditioned and enforced? At present, even when landscaping is conditioned it is often not implemented by developers or enforced by LPAs. This is an issue and can mean that the appearance and liveability of new developments is not up to the standards presented in the planning application and expected by new residents.
- Page 28, para 81 refers to green and blue spaces but the rest of the section relates predominantly to green spaces and infrastructure. Should there be more reference to blue infrastructure (where applicable)? Also on this issue, green infrastructure is listed in the glossary ('Appendix 1: Definitions') but blue infrastructure, which is probably less widely known is not. Please could that be added to the Definitions?
- Should green and brown roofs be included in the Definitions? Also 'ecological niches'?
- On various pages, including pages 31 and 33, the retention, protection and enhancement of ancient woodland is mentioned, which is positive. However, shouldn't the guidance be encouraging the retention of all woodland, given the climate and biodiversity crisis?
- Page 36, para 105 and 106: although I agree with the street layouts and hierarchies suggested, design needs to be realistic about car ownership and the number of car movements in reality, rather than what we might like in an ideal world. Numerous developments with cul-de-sacs and narrow streets with shared surfaces have inadequate parking and turning areas and what were envisaged as attractive communal spaces have ended up as informal car parks, that create a dangerous environment where drivers, pedestrians and cyclists are forced to park and manoeuvre dangerously as there are insufficient areas to park. Streets are too narrow for the number of vehicle movements, especially when cars are parked on the streets.
- Page 38, para 117 – parking should also be designed to be sufficient for the likely number of cars in the particular environment – including deliveries and visitors. This can be even

more of an issue if there are facilities such as a care home, school, nursery or shop, where more visitors can reasonably be expected and there is insufficient parking to accommodate them. This is not such an issue in urban areas where better public transport, walking and cycling opportunities exist but can be more of an issue in suburban and potentially rural areas.

- Para 53 is at odds with emerging NPPF PM13 – what is the point in the design guide at para 53 saying ‘By prioritising energy efficiency...’ when PM 13 limits issues to which quantitative standards can be set.
- Page 53, para 64: should the retention of existing features (e.g. historic walls and other built features, plot and field boundaries, conversion of existing buildings where possible) and consideration of existing features off the site (e.g. creating views and focal points to architectural features such as church towers) be included in the bullet points as a way of enhancing or creating identity?
- Figure 12 – title does not read well. Maybe it is ‘rainfall **and/or** greywater’?
- Figure 12 and 14 C – not sure what the image is showing highlighted in relation to minimising climate risks and water... it highlights a portion of roof.
- Para 68 – what about avoiding areas at high risk of flooding as per the NPPF?
- Para 70 needs to refer to incorporating existing trees.
- C4 just really focuses mostly on cooling and keeping cool. Not much really about warm homes.
- Page 72 image doesn’t really show nature. It shows a bit of planting.
- N1 – what about blue infrastructure? Para 81 introduced blue spaces.
- Para 82, bullet point 4 is supported, but no images reflect this. The front cover and the snippets from it through the document show fenced which will interrupt wildlife networks.
- Page 84, the existing and proposed NPPF both contain policies that require that conditions should not be used to diminish the quality of approved scheme (policy DP4c of the proposed NPPF). I would suggest that something is added in this section to reiterate that proposals should be deliverable and variation of condition applications should not be used to water-down the quality of approved schemes (this is something we regularly come across).
- Page 86, para 268 – it is not just major developments that require DASs (e.g listed building consent applications and certain applications in conservation areas). This should be made clear.
- Para 91 – biodiversity enhancements is different to net gain. Biodiversity enhancements could include a swift brick, but that is not BNG; it is provision for a species rather than net gain on a lost habitat. The two are different.

- Figure 21 does not really highlight anything that is included in the chapter - it highlights paths across open spaces – described in Figure 26 as ‘landscaped pedestrian route’.
- M5 only mentions cycle parking briefly. If the movement hierarchy has cycling towards the top, there needs to be more on cycle parking.
- Para 180, second sentence not finished.

Answers to questions:

- Q6: Yes the useability has certainly improved
- Q7: More emphasis on how the principles relate to smaller developments and those in rural areas.
- Q8: I don’t know – do you Nat? I would have thought the high-level principles would apply
- Q10: Yes
- Q11: Resources are the main issue for most LPAs. Additional resources for LPA to adequately resource the development and ongoing implementation, monitoring and updating of design codes. Ideally this would be through funding to provide in-house roles and upskilling, rather than bringing in consultants to produce the document, so that LPAs develop more in-house capabilities.

Appendix 4 - Fleggburgh Neighbourhood Plan Regulation 14.

Fleggburgh Parish Council

Document: <https://www.fleggburghparishcouncil.co.uk/neighbourhood-plan-consultation>

When sent to Members: 24 February 2026

Due date: 08 March 2026

Proposed level: Was endorsed by Members by email.

Response

Neighbourhood Plan

- Para 14 ends with 'The Broads Authority's policies must be read alongside those in the Neighbourhood Plan where relevant'. This applies to the GY Local Plan, so this needs to be included in para 13 as well.
- Para 15 will need updating to reflect the transition arrangements for the emerging NPPF.
- Para 17 – does the preparation of the new Local Plan for the Broads also influence things?
- Page 5, objective B – not just the landscape setting of the Broads, but also the Broads itself?
- Images need alt text
- Page 13, Figure 3 – I would suggest that the 'character areas' map be made larger to make it easier to read and identify the exact boundaries of the character areas.
- Para 31 – include Broads Local Plan equivalent policy.
- Section 5 needs to refer to the Broads Design Code SPD.
- Do the images need to be explained or have a title to explain what they are showing and why they are included?
- Policy 2, intro paragraph: 'All new development within the parish must demonstrate high-quality design that respects local character and contributes positively to the landscape character and the rural setting of the Broads'. Part of the Broads is actually within the NP area. So it is not just the setting of the Broads.
- Policy 2 a – similar to the intro paragraph: 'Be well integrated with its surroundings, maintaining a clear transition between the built-up area and open countryside and protecting the landscape and setting of the Broads'.
- Policy 2h – you might want a footnote referencing our [Broads Authority biodiversity enhancements](#) guide. You do so at para 56, but suggest the footnote at policy 2h.
- Suggest putting the entire policy in blue shading, not just the title. That makes the entire policy stand out and obvious. The policy on page 13 for example includes the title twice which would not be needed if the entire policy was shaded blue.
- Section 6 – minor comment, but the image does not really celebrate Fleggburgh's biodiversity that the policies in that section then seek to protect – the image is of a driveway with trees and hedges.
- Section 6 – you need to refer to the Local Nature Recovery Strategy.
- Para 50 - as this is a planning document, best not to refer to the Broads as National Park.
- Policy 4 para 2 – what are biodiversity credits referred to?

- Policy 4 para 3 – you need to future proof – the emerging NPPF refers to minor, medium and large development. Perhaps you mean medium and major development?
- Policy 5 – how does this fit with the NPPF tests for local green spaces which treats them like green belt? That is not referred to anywhere.
- Policy 5 – should the local green spaces be included in the policy or the map referred to?
- Policy 6 para 2 says ‘Outside the Broads Authority Area, where Policy SP4 of the Broads Local Plan applies...’ – this can be read that SP4 applies outside of the Broads area. What you are saying is that SP4 does not apply outside of the Broads Area.
- Throughout – add para numbering to policies paragraphs and bullet points for ease of reference by people in the future who want to use the policy.

Objection

- Policy 6’s stance on Best and Most versatile agricultural land is contrary to policy SP4 of the Local Plan for the Broads. The supporting text of that policy includes two tests:
 - A: unless it can be demonstrated that the need for the development clearly outweighs the need to protect such land in the long term,
 - B: or in the case of temporary/potentially reversible development that the land would be reinstated to its pre-working quality, and there are no suitable alternative sites on previously developed (brownfield) or lower quality land’.
- The NP policy has two tests.
 - 1 The land is not in active agricultural use and there are no reasonable opportunities for continued productive use; or
 - 2 The proposal would deliver significant community benefits that clearly and demonstrably outweigh the long-term harm resulting from the loss of such land.
- A and 2 kind of match.
- 1 brings in another test, different to the Local Plan for the Broads.
- Policy 6 – paragraph starting ‘For the purposes of this policy...’ – that seems to be supporting text.
- Policy 6 – ‘protect the landscape and setting of the Broads’ – again, to reflect that part of the Broads is within the NP area, so it is not just about the setting.
- Policy 6 – last part – you may want to refer to our guide: [A guide to integrating development into the Broads Landscape](#)

Objection

- Policy 7 does not talk about justifying the need for lighting in the first place. There is something at part 3 of the policy (under the bullet points), but that is not as strong as the supporting text on page 30 at para 72. The strength of wording from para 72 needs to be included as a new para 2 of the policy rather than part 3 of the policy.
- Policy 8 part 1 is about all types of flood risk, not just surface water.
- Policy 8 – does this add anything to national and Local Plan policy?
- Page 41 – care is needed when using the Census 2021 for transport purposes. It was a lock down year. The County Councils seem to ignore it or at the very least quote that and the 2011 Census.
- Policy 10 seems to have three parts and may benefit from being presented as a three part policy rather than one paragraph.

- Para 102 – where is the data from?
- Para 104 – what year is this data from?
- Policy 11 – I understand what you are trying to say, but I don't think 'Development must not harm highway safety' is the best way of saying it. Do you mean cause highway safety issues? Cause safety concerns? Need to consider highway safety?
- Throughout – having policies go onto two columns with a repeated title is a tad confusing.

Evidence base document

- Page 14 – you may want to update the road traffic incident for the next consultation as the data you have is until 2023.
- Page 19 onwards – you may want to include the 2011 travel to work information. I am aware that the County Councils tend to not use 2021 travel to work because of the lockdowns. Perhaps use both Census?
- Images need alt text
- Flood risk data – last year, there was updated flood risk layers releases by the EA – does this reflect them? There is also another release of flood risk data in the next few weeks. You may want to check and ensure the information is correct for the next consultation.
- Did you want to reflect the most recent deprivation data?

Design Guidance and Codes:

- Page 9 – amend name of our design guide / code to Broads Authority Design Guide and Code
- Page 25 – Built Form – Massing and Scale – it states that 'new homes should be designed to align with the height of mature trees'. This seems a slightly strange way to assess the acceptability of the height of new buildings. Firstly many mature trees are taller than an average two storey home – so is this leaving it somewhat open to people arguing for taller buildings than might be acceptable in this area? Secondly trees grow, so even if it is considered the height of the trees in the area might be an acceptable height for a new house now, they might not be in 10-15 years.
- Page 36 – it might be useful if the PROW dotted line was different colour to the hatching for the Broads and Green Network, as it is hard to see PROW in these areas.
- Page 39 – the photo for 'white timber window frames' appears to show UPVC windows.
- Page 46, Fig 53 – I think these are patio slabs rather than a permeable block driveway. The image used for figure 21 could be used again?

Appendix 5 - Hoveton Neighbourhood Plan Regulation 14.

Hoveton Community Council

Document: <https://hoveton-cc.gov.uk/hoveton-neighbourhood-plan/>

When sent to Members: 23 April 2026

Due date: 01 June 2026

Proposed level: Was endorsed by Members by email.

Response

Neighbourhood Plan

- Para 14 – Neighbourhood Plans need to reflect the policies in the NPPF as well.
- Para 15 – The Local Plan for the Broads is at examination.
- Para 18 – I wouldn't say the other document are supplementary documents – sounds a lot like Supplementary Planning Documents and could cause confusion. Maybe call them supporting documents.
- Para 44 – First part – all houses are built for those who live in them. Perhaps in relation to self/custom build you might want to say something like 'built with involvement of those who will live in them'.
- Para 48, p21: says that the proposed housing sites are shown in Figure 3 but I think its figure 4.
- Policy HNP1 part a – suggest the second part is supporting text rather than policy text.
- It is confusing to have the same title repeated for a policy that spills over two pages. The policies are highlighted blue and that shows they are a policy.
- Para 49 – the brownfield land off Station Road is in the adopted Local Plan and is policy HOV3. It is in the emerging Local Plan for the Broads and that reference is PUBHOV3.
- Page 23, Policy HNP4: I would suggest that the 'where practicable' in para 51 and policy HNP4 b and d in relation to the retention of heritage assets on the King's Head site should be removed. The forthcoming Local Plan takes a stronger stance on the re-use of existing buildings, rather than demolition and there are also tests in the existing and forthcoming Local Plan policy DM11 (PUBDM13) Heritage Assets, which would need to be met, as well as requirements in the NPPF. I would suggest that part b of the policy should read: 'Retain and sensitively reuse the existing cottages and stable buildings adjacent to the King's Head pub'. If it is felt necessary, it could go on to state, 'Development resulting in harm to or loss of these buildings would only be acceptable where it meets the tests set out in the Broads Local Plan Policy PUBDM13'.
- Policy HNP4, g – perhaps say that proposals meet national flood risk policy requirements as well as resilience.
- Policy HNP4 – for your information, we intend to reconsider the area to which PUBHOV3 applies. It may be that we accept that the Former Hotel Cottage stays as a car park. There is a planning application in with us now. It seems the car park is well-designed and well-used. This is all to be confirmed and you will of course be consulted on any modifications to the Local Plan. But I just wanted to mention this potential change.

- Policy HNP4 part b – I would suggest that reference to the Local Plan for the Broads is made at the end of this in some way. Our criterion on this is a bit stronger and in the emerging Local Plan, we introduce stronger stance on re-use and on demolition. As written, without some reference to that, this criterion may conflict with the Local Plan for the Broads.
- Page 23, para 51: You should state that the Kings Head cottages and stables are considered Non-designated Heritage Assets in the Neighbourhood Plan and cross-reference to policy HNP24, the objectives of which would also need to be met.
- Policy HNP5 e – did you want to say ‘if required’ after the reference to BNG? I am aware that, for example, the size of schemes to which BNG applies is going to change.
- Policy HN6: Design g) In parts of Hoveton the number of signs leads to visual clutter and reduces the effectiveness of the signs. Would it therefore be worth adding something to state that existing signage should be rationalised and consolidated to reduce visual clutter?
- Policy HNP7 – I am not sure what this means in practice: ‘Where both brownfield and greenfield development options are available and deliverable, preference will be given to proposals that make effective use of brownfield land’. The two allocations are on greenfield land as I understand it. And the general thrust is perhaps along the lines of the more houses the better. I am not sure what this part really means and what a Development Management Officer will do with it.
- Policy HNP8 – you should refer to the retail policies of the NNDC and BA Local Plan and also policy HOV5 and PUBHOV5 and any NNDC equivalent.
- Para 106 says ‘Applicants must calculate a nutrient budget for their development and secure appropriate mitigation, whether through on-site measures such as 41 42 wetlands, tree planting or nutrient-removal SuDS, off-site land-use changes, or through participation in the Broads Authority’s strategic mitigation programme’. The Broads Authority does not have such a programme. What are you referring to here?
- Page 46-48: The Hoveton Hall estate is mentioned several times, but would it also be worth mentioning the Hoveton House estate (which includes Bewilderwood but lots of other land), another large estate in the Hoveton NP area?
- Policy HNP14, third part – ‘and sensitively designed’ part does not read well. Maybe it is a new sentence that requires such infrastructure to be sensitively designed.
- Para 123 says ‘the site’ – is it linked to BeWILDerwood? Should 123 form part of 124 for continuity?
- Did you want to mention that there is a detailed policy relating to BeWILDerwood in the Local Plan for the Broads?
- Natural Environment section – this does not mention the Local Nature Recovery Strategy (LNRS) for Norfolk that has been in place for some time now. This is a key bit of data and a very important strategy that needs to be included in this section. How does Figure 16 relate to the LNRS?
- The Natural Environment Section is almost entirely about the terrestrial habitat but there is almost nothing about the rivers and lakes.
- Para 132 – what does ‘near’ mean?
- Page 52, Figure 17 – appears to show part of the Station Road brownfield site covered by policy HNP4 as Local Green Space (site 1). Perhaps the boundary needs to be more closely drawn to the riverside walk / Riverside Park area?
- HNP16 and 17 need to refer to the LNRS.

- Policy HNP17 – what are Hoveton’s Ecological Networks? Are these mapped? Figure 16 is called green corridors. Or are A and C of the policy the ecological networks?
- Page 56, Policy HNP18: should this include some words to state that proposals to enhance these spaces would be welcomed and supported? There are some spaces that would benefit from enhancement.
- Page 60, Policy HNP19c: add ‘harm the character of Broads landscape **or waterscape**’
- Policy HNP20 – this goes straight into lighting design rather than seeking justification for lighting in the first place.
- Page 59-60, Would views up and down the river from Wroxham Bridge not be considered important viewpoints? Or views from the river?
- Para 148 – the developments don’t have to pay the tariff; they might want to address the mitigation in another way. The issue is that they need to mitigate for their impact and the tariff is likely to be easiest and potentially most cost-effective way of doing it.
- Paras 147 to 152 seem to fit with policy HNP16 part f.
- The 3 rivers way is a prominently signed cycling route, but it doesn’t seem to get mentioned, should it be?
- Policy HNP22 part d and HNP23– need to refer to HRA when promoting access to potentially protected sites. You kind of refer to it in part d of HNP23, but you might want to talk about it in supporting text and in HNP22 and refer to HRA?
- Policy HNP26 f – this is not really related to the other bullets. The other bullets refer to existing upper floors whereas f relates to new – suggest this becomes its own section.
- Is there a community action relating to working with those buildings with upper floors about the potential for better use of the upper floors?
- Policy HNP27 c – this is written as an ‘or’ policy. Isn’t the ideal outcome that the public realm and signage and walking and cycling connections are all improved?
- Policy HNP28 includes flood risk, but there is policy HNP21. Why are both needed? Could they be combined to have one policy on flood risk?
- Page 70 – I would suggest that they check the listed buildings as it is currently incorrect. They have shown the Old Vicarage as being grade II listed but it is not listed at all but they have not shown Leisure Hour or Church Farmhouse which are listed. I would suggest they refer to Historic England’s website ‘Search the List’ and do a map search [here](#).
- Page 70, figure 23 is supposed to shown designated heritage assets, but it does not show Wroxham Bridge which is a scheduled ancient monument and is therefore a designated heritage asset.
- Page 71-72, Non Designated Heritage Assets: It would be useful if more detailed mapping can be provided for buildings such as no. 21 Wet Sheds so we can be certain which sheds you are referring to (it is noted that they are shown in more detail in the NDHA assessment).
- Para 201 – HNP18 is on Local Green Spaces.
- Policy HNP28 is mostly about flood risk. It is only part d that is about other issues.

Evidence

- Introduction, end of para 2 says ‘Although a neighbourhood plan has little role to play in the protection of national landscape designations, it is still worth including such evidence as it is useful context that helps people to gain a greater understanding of their area’. Part of the Neighbourhood Area is a protected landscape, so this sentence is confusing..

- Page 16 – above map 4 – and throughout - the Local Plan for North Norfolk has been adopted now.
- Page 18 has a random snippet 'In the Broads Local Plan'
- Page 19 says 'The draft Local Plan' – which Local Plan is that?
- Page 23 and 24 – you might want to focus more on 2011 Census for travel to work. I know that is what the county councils do.
- There is no reference to the LNRS

SEA and HRA Screening

- Page 32, Figure 17, g – don't forget to mention that the Broads is a protected landscape with the status equivalent to a National Park.
- HRA screening – do you need to mention Nutrient Neutrality and RAMS?
- Policy HNP22 part d and HNP23 – need to refer to HRA when promoting access to potentially protected sites. You kind of refer to it in part d of HNP23, but you might want to talk about it in supporting text and in HNP22 and refer to HRA? Might need mentioning in the HRA screening.

Design Guide

- It is not considered that 3.1 Building line, Setback and Layout adequately covers those properties that are positioned adjacent to the water (quite a number of properties in Hoveton). They should either be amended to cover these sites or the BA Design Guide and Code should be referred to for properties in the BA area.
- Page 37, 3.3 Landscaping: This doesn't adequately cover the riverside landscape.
- Page 43, Figure 39 – I would suggest that this is not the best example of a waterside development. I have attached a photo of a couple of better schemes (not necessarily the best photos) which are more akin to the sort of development we would wish to encourage.

Appendix 6 - Biodiversity net gain: considering a targeted exemption for brownfield residential development

DEFRA

Document: [Biodiversity net gain: considering a targeted exemption for brownfield residential development - GOV.UK](#)

When sent to Members: 1 May 2026

Due date: 10 June 2026

Proposed level: Was endorsed by Members by email.

Response

6. Do you support the proposed regulatory definition of residential brownfield development?

Yes

7. Do you agree that the proportion of the land within the planning application boundary should be $\geq 75\%$ Previously Developed Land (PDL) to qualify?

Yes

8. To what extent do you agree that the proposed regulatory definition aligns with current interpretations of 'Previously Developed Land' under the NPPF glossary for planning decisions?

Unsure

The PDL definition explicitly excludes 'land that has blended into the landscape'; this has been defined in case law so is well understood. If you can't see where the building was in 1948 and when you look across the site and its former position is part of the landscape, then it is likely to have some general biodiversity, and its loss may be significant. The brownfield definition used here should be a subset of the NPPF PDL definition. The omission of the 'blended into the landscape' exclusion means that there will be sites that are classified as brownfield under these regulations that is not classed as PDL under the NPPF. This creates added complexity and has the effect of excluding PDL areas from BNG that are more likely to be rich in biodiversity than the average brownfield site.

9. Overall, do you consider the proposed definition and evidential requirements to be proportionate and workable for applicants and local planning authorities?

Unsure (see question 8 response)

Our answer relates to the definition. You don't talk about evidential requirements in this section of the document.

10. What impact do you think the introduction of a mandatory BNG requirement has had on brownfield residential schemes of less than 2.5 hectares?

I don't know

11. Do you support a targeted area based exemption for residential brownfield development? We are also consulting on a proposed definition of “brownfield development”, including the threshold for the proportion of previously developed land (%PDL). For this question, please answer on the basis that the proposed definition will be taken forward.

No.

The evidence presented in the consultation document points towards this not being a reasonable approach.

One of the conclusions of this and other work is set out at page 27 and says: ‘Although brownfield land is often assumed to support lower ecological value than greenfield sites, the statutory metric assessments and ecological evidence underpinning the calculations indicate that in practice, the biodiversity value of some brownfield sites can be comparable to that of greenfield development²⁸’.

And

Table 3 (and 4 and 5), last column shows a greater loss to nature than cost savings to developer (penultimate column).

These two bits of information seem quite significant, yet there is no detailed consideration of these. Fundamentally, they imply that exempting brownfield land from BNG, above 0.2Ha, will lead to significant biodiversity loss.

With the new threshold for BNG being 0.2Ha and there being the potential for a proxy habitat type to be used rather than open mosaic habitat, there seems to be benefits to brownfield schemes that will still ensure BNG.

I note that you have not done an assessment of using a proxy for open mosaic habitat to understand the costs for developer and the cost to nature. This needs to be done and then it can be compared to the tables 3, 4, 5.

12. If you support a targeted area-based exemption for residential brownfield development, which exemption threshold for a residential brownfield development do you support?

We do not support this exemption for reasons set out in the answer to question 11.

But if there were to be an exemption, perhaps 1.5 hectares.

13. Do you think there is a case for an area-based exemption for residential brownfield development that is greater than 2.5 hectares?

We do not support this exemption for reasons set out in the answer to question 11.

But to answer the question, No

The “sweet spot” seems to be 1.5. From 1 to 1.5 the developer savings are massively increased, with a small cost to nature increase; above that the developer savings do not increase substantially but the cost to nature continues to rise.

14. Do you foresee any unintended consequences arising from a targeted exemption for brownfield residential development?

Yes

The biodiversity on the brownfield land is there. For schemes on brownfield land to not have to do any BNG, there would be a net loss in biodiversity.

One of the conclusions of this and other work is set out at page 27 and says: ‘Although brownfield land is often assumed to support lower ecological value than greenfield sites, the statutory metric assessments and ecological evidence underpinning the calculations indicate that in practice, the biodiversity value of some brownfield sites can be comparable to that of greenfield development²⁸’.

And

Table 3 (and 4 and 5), last column shows a greater loss to nature than cost savings to developer (penultimate column).

These two bits of information seem quite significant, yet there is no detailed consideration of these. Fundamentally, they imply that exempting brownfield land from BNG, above 0.2Ha, will lead to significant biodiversity loss.

What if a developer artificially splits up their brownfield site with numerous applications to ensure that each application is less than the threshold that you introduce? The proposal discourages whole site applications. The redline will be drawn more tightly around building footprints, leaving the remainder, vulnerable to ad hoc sub planning permission ‘development’ (e.g. establishing gardens), future development, or sale to other developers. Could it also reduce garden size as space becomes more limited? If these are important factors, then perhaps 70% would be better than 75%?

15. How easy or difficult do you think it would be for applicants and LPAs to apply this exemption in practice?

We do not support this exemption for reasons set out in the answer to question 11.

But to answer the question, Easy

It could be easy to apply, but tests or a flow chart would need to be provided to ensure a consistent approach to the exemption across the country. Potentially guidance on the type of evidence needing to be submitted by an applicant to prove the site is PDL and a Brownfield Residential Development – not equivalent or even nested definitions.

16. Do you think any additional measures are needed to ensure that the exemption is appropriately targeted in relation to potential ecological impacts?

Yes

The emerging NPPF touches on biodiversity enhancements, such as swift bricks, but if brownfield land is to be exempted from BNG at a set threshold, then there needs to be a strong national requirement for the scheme to provide biodiversity enhancements, perhaps linked to the LNRS for the area. Such enhancements can be effective, but not too pricey.

Also, table 3, 4, 5, last column shows significant impact on nature from the proposed exemption. Would the Government provide the amount of money set out in the last column, related to the threshold that is chosen, to local/regional or indeed national wildlife organisations to spend on seeking net gain?

Should the lost BNG be transferred onto the other non-Brownfield Residential Development sites? So, if there is an 11% loss of units because of the carve out, this is moved onto other sites, so they need an c.11% uplift. That would seem to maintain the purpose, concept and stated outcome of the BNG scheme. Otherwise, it is an unmitigated loss of biodiversity – which feels inappropriate. Would there be another way to mitigate the lost biodiversity gain units?

17. If you have any further evidence about the administrative, viability, biodiversity or nature market impacts for this exemption that you have not provided in previous responses, please provide it in the box below. Any evidence submitted will be reviewed by the department but will not be analysed, summarised, or included in the published government response.

How does this proposed exemption for brownfield schemes above a set threshold fit with OMH proxy idea discussed in the consultation response? If you are introducing a proxy, why does brownfield need an exemption? Also, you are raising the area to which BNG applies to be over 0.2Ha, so some brownfield land schemes would not do BNG anyway.

It seems that a proxy to open mosaic habitat and, no proposed exemption above 0.2Ha will ensure that there is not the loss to nature as set out in table 3 (and tables 4 and 5), last column and also the fact the biodiversity value on brownfield land that is equivalent to greenfield land is not lost.

Both the PDL and the Brownfield Residential Development definitions are clear that these terms only apply to 'land'. What if a site includes or borders on a water course, pond, or lake? Is the red line of the scheme to be drawn to exclude the water? Also, if the line is drawn tightly around the building footprint does that make it more likely that waterbodies will be left out of the development application and be at greater risk from outside the red line impacts from the development or damage due to associated garden development not requiring its own planning permission. If water is included in the definition of Brownfield Residential Development, then this creates another deviation from the definition of PDL – water can be brownfield but not PDL. In which case would the water be exempt from the watercourse metric or other BNG calculations? The water is not PDL. There needs to be clarity about how this will be addressed, and there does not appear to be an obvious satisfactory solution.

What if a brownfield site has a water course bordering it – that is that the red line of the scheme goes up to the water? Would it be exempt from the watercourse metric? The water is not brownfield.

The main reason for this exemption is because it is difficult, if possible, to BNG for open mosaic habitat. But what about other habitats that might be on brownfield land that are not open mosaic habitat? These may be lost with the proposed BNG exemption.

Appendix 7 - Supplementary Planning Document (SPD) on affordable housing in Norwich

Norwich City Council

Document: [Current consultations | Norwich City Council](#)

When sent to Members: 13 May 2026

Due date: 08 June 2026

Proposed level: Was endorsed by Members by email.

Response

Support 1.6 – we will endorse this at Planning Committee and Broads Authority in July.

3.2 – just for information and I don't think it needs to be mentioned in the SPD, but our current Local Plan seeks off-site affordable contributions for schemes of 6-9 dwellings. The emerging Local Plan seeks affordable housing off-site contributions for schemes as follows:

- a) Brownfield schemes located on the waterfront: 3-9 dwellings
- b) Other brownfield schemes: 5-9 dwellings
- c) Greenfield schemes: 3-9 dwellings.

4.3 bullet 1: '...however all sums will be index lined using...' – lined or linked?