

Planning Committee

03 February 2023

Agenda item number 11

Consultation Responses

Report by Planning Policy Officer

Summary

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

Recommendation

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

1. Introduction

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

Author: Natalie Beal

Date of report: 20 January 2023

Appendix 1 – Planning Policy consultations received

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Trowse Parish Council

Document: [Neighbourhood Plan - Trowse with Newton Parish Council \(norfolkparishes.gov.uk\)](#)

Due date: 12 February 2023

Status: Regulation 14

Proposed level: Planning Committee Endorsed

Proposed response

Generally, the Neighbourhood Plan is welcomed. There are areas where clarity is needed and some areas where reference to the Broads and its status needs improving. The evidence base should also be updated. In terms of the design guide, this needs better assessment of the Broads for it to apply to development in the Broads.

General

- Please can you check the accessibility of documents? The images need to have alt text for example.
- I suggest numbering each part of a policy so it is easy for reference.

Plan

- Para 10 – there is a specific policy for Whitlingham Country Park in the Local Plan for the Broads which could be referenced.
- Para 21 says ‘The proportion of three-bedrooms homes in Trowse will, reduce as a result of the Norfolk Homes development, to just below one-third.’ – I don’t think the two commas are needed.
- Para 27 – please say that the Broads Authority are producing their design guide and recently consulted on it (end of 2022).
- Figure 4 could do with being a bit bigger so the key can be read easier.
- Policy 2 – Please see comments on the design guide – we feel that as written, the design guide does not adequately reflect the Broads, but if our comments are taken on board, that issue will be addressed. In some other areas where the design guide does not address the Broads well, it does not apply to the Broads.
- Policy 2 – Para 3 – I am a bit confused as to why you have brought out four areas of the design code. The code has guidance for the entire parish, so why only talk about 4 areas?
- Para 39 last sentence just ends and seems to not be finished.
- Para 4- ‘known as May Gurney **site**’?
- Figure 9- could do with being bigger as it is hard to read the key and other writing.

- Para bottom of page 20 – para number missing,
- Para 44 – and the May Gurney site is immediately adjacent to the BA Executive Area.
- Para 52 – Would suggest: ‘This is particularly important for parts of the site adjacent the river as there are key views across the river from Trowse *and it is immediately adjacent to the Broads Authority Executive Area.*’
- Para 53 – the second sentence – is quite long and I am not sure it reads well – for example the wording about County Hall does not link to the rest of the para it seems.
- Policy 3 – ‘May Gurney **site**’?
- Policy 3 is written like a vision by saying things like ‘The development will have high quality design...’ but there is no instruction here. You might want to say ‘will need to’ or ‘must’ or ‘will be required to’.
- Policy 3 and supporting text – you may want to refer to the setting of the Broads as that is protected through the NPPF.
- Policy 3 – when you talk about trees, you might want to say ‘the right tree in the right place’.
- Policy 3, first para under transport links title – says ‘Where adjacent spaces or buildings, the visual impact of this should be mitigated through planting.’ – does this refer to cycle parking still? It is not clear.
- Policy 3 under transport links, second para says ‘this is a condition of planning permission’ – do you mean this must be a condition or already is – as written, it is not clear.
- Policy 3 – general check of the use of should and the use of the word encouraged as well as the use of will as mentioned above.
- Policy 3 - should perhaps contain some reference to the site being immediately adjacent to the BA Executive Area and the protected setting of this.
- Para 62 – BNG is set for November 2023.
- Para 63 – suggest you refer to our Biodiversity Enhancements Guide,
- Policy 4 – suggest you need to set a threshold to which the BNG requirement will apply – all new and replacement buildings perhaps? It could apply to a sign or replacement windows as written.
- Policy 4 – I can guess that you want applicants and DM officers to use the NE metrics (3.1 and small sites), but you do not say this in the text. You say it in the policy, but only in relation to 10 to 25% BNG.
- Policy 4, f – something we are looking into is, given the changing climate such as the hot summers, is it best to have native species? That being said, non-native species may suffer in the cold. No answers yet, but it is an issue we are thinking about.

- Policy 5 – is the sentence starting with ‘new buildings are inappropriate’ meant to be the first bullet point? It is not at the moment.
- Section 6.3 – if you are talking about landscape, you might want to mention the Broads here.
- Policy 14 – should it seek the re-use and retention of the non-designated heritage assets?

Evidence base

- The date on the front is February 2020. I would suggest that the evidence needs checking and updating where possible and the date on the front updated.
- Section 1 does not really explain about the Broads and that part of the area. Would suggest this needs improving.
- Section 3 – I can’t see the source for much of the information in here.
- Figure 8 could be updated.
- Page 11 – is the school open?
- Page 12 – you could update the completions data. Think that is 3 years old now.
- Does section 5 need updating?
- Figure 11 – what is the source and year (and does it need updating)?
- Figure 21 – is the red line the conservation area – don’t think it is on the key

Views document

- Does it matter that the last view discussed does not have a photo?

Design Code

Whilst the Guide has considered the context of the Broads, the omission of reference to the status of the Broads, policy WHI1 and the emerging design guide are worrying and need to be addressed in order for the Design Guide to apply to the Broads.

Here are some detailed comments:

- 1.3 – this section needs to mention the Broads and its status as an equivalent to a National Park.
- Map on page 7 needs to show the Broads Authority Executive Area
- 2.5 – needs to mention the policy WHI1: Whitlingham Country Park
- 2.5 needs to mention our planning guides: [Broads planning guides \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/broads-planning-guides)
- 2.5 needs to mention our emerging Design Guide that was out for consultation in October and November 2022: [Consultations \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/consultations)
- 2.5 needs to refer to our review of the Local Plan: [Consultations \(broads-authority.gov.uk\)](https://broads-authority.gov.uk/consultations)
- 3.1 – also the area is a registered park and garden
- 3.1 – 2 – do the parked cars slow vehicle speeds?

- 3.1 – 5 – this is too simplistic. The Parish has areas of surface water flooding as well. And the main approach to flood risk is to not develop in flood zones in line with the NPPF. This section needs addressing as it is misleading and not in line with national policy.
- Figure 05 – needs to show the area of the registered park and garden
- Figure 05 – a good map, but would benefit from having its own page.
- Fig 05 should also show the BA boundary.
- 3.1 – no mention of the Broads and its status in this section.
- 3.2 – part of the TNCA is in the Broads and that needs to be mentioned.
- Page 18 – bullet above ‘green corridor’ – for consistency, does this need to start with ‘opportunity’?
- Page 18 under 4 – says ‘a network existing the hedgerows and trees’ – does not make sense as written.
- Figure 07 – needs to show the area of the registered park and garden
- Figure 07 – a good map and on its own page, but could be bigger and utilise the blank space on the page.
- Figure 07 – the numbers do not appear on the key – what do they depict?
- Page 20 – the dates have been and gone and so suggest this section needs updating
- 3.3 – this area seems to be in the setting of the Broads which is protected in the NPPF and therefore the setting of the Broads needs to be mentioned here.
- Figure 12 – needs to show the Broads for context
- Figure 12 – a good map, but would benefit from having its own page
- DC1.2 – an ideal place to refer to the fact that part of the parish is in the Broads, yet there is no reference.
- Generally, in reference to trees, should the guidance be ‘the right tree in the right place’?
- Again, in relation to trees, an issue we are talking about – given the changing climate (hotter summers in particular), should trees be native? Will they survive? That being said, will non-native trees cope with the cold? We don’t have an answer yet, but this is something we are looking into and the consultants may have some thoughts?
- DC1.3 – how about the country park? Isn’t that a landmark? Does that relate to views?
- DC1.4 – an ideal place to refer to the fact that part of the parish is in the Broads, yet there is no reference.
- DC1.4 ‘New development should avoid threatening existing ecological assets e.g. Whitlingham Park’ etc’ add the Broads National Park?
- DC2.1 – should there be mention of and reference to Manual for Streets here?
- Page 29, third bullet in first green box – there is an end bracket, but no start bracket
- Figure 18 – a good map and on its own page, but could be bigger and utilise the blank space on the page.
- Figure 19 does not look like a tertiary road – it looks more like a mews
- 2.3 – also the ski slope and the campsite are reasons to visit the area. Does it need to mention the demand from Norwich City supporters when there is a home match?
- Figure 26 – why is this a bad example? Some explanation would help.
- Figure 55 is quite blurry.
- Page 63 and Figure 70 and 71 Character Areas – there is an area shown as ‘The Broads’ character area. However the actual Broads area is larger than this. Could there be a note to clarify this so as not to lead to confusion?
- Page 65 is the first real reference to the Broads and its status.

- Page 65 section on TB-The Broads – this should explain that the TB area shown on the plans is not the actual area of the Broads, which extends almost into the village or alternatively the plans should be amended to show the Broads Executive area.
- DC5.5.2 – should the setting of the Broads be referred to here?
- Section 6 – there is no mention of the Broads anywhere in the general questions section and it seems prudent to do so given the status of the Broads.
- There seems to be nothing about light pollution in the Guide.