

# Planning Committee

03 December 2021

Agenda item number 11

## December Issues and Options Bite Size Pieces

Report by Planning Policy Officer

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### Summary

The review of the Local Plan for the Broads is underway. This report introduces some sections of the emerging draft Issues and Options stage of the Local Plan. These sections cover the approach to consultation, existing housing stock and peat.

### Recommendation

Members' thoughts and comments on the draft sections are welcomed.

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## 1. Introduction

- 1.1. The review of the Local Plan for the Broads is underway. The first document produced as part of the review of the Local Plan will be an Issues and Options consultation. As well as advertising that we are reviewing the Local Plan this stage identifies some issues and related options and seeks comments. Responses will inform the subsequent stages of the Local Plan.
- 1.2. This report introduces bite size pieces of the Issues and Options. Members will of course be presented with the final draft version of the Issues and Options to endorse it for consultation at a later Planning Committee.
- 1.3. The bite size piece covers the approach to consultation, existing housing stock and peat and these are attached as appendices to this report. Members' views on these draft sections of the Issues and Options are welcomed.

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Date of report: 22 November 2021

Appendix 1 – Approach to consultation

Appendix 2 – Existing Housing Stock

Appendix 3 – Peat



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**Approach to consultation**

This bitesize piece discusses the proposed approach to consulting on the Issues and Options. It is not the exact wording that will be included in the Issues and Options. Members' views on the proposed approach are welcomed. The following reflects the Statement of Community Involvement that is also at the 3 December 2021 meeting of the Planning Committee for adoption.

Consultation period

We propose an 8 week consultation period.

Advertising the consultation

We will write to those on the consultation database and announce the consultation on Twitter and Facebook. We will ask Parish Councils to advertise the consultation in any way they can. We will also place an advert in the EDP.

Receiving comments

We will accept comments by email and post. We will ask some questions throughout the consultation period on Facebook and Twitter – we will take some questions from the Issues and Options and share them on social media, one a week. Where we ask for sites to be put forward for consideration (such as local green space), we will aim to use Survey Monkey as a way of providing us with the required details.

Discussing the document with Officers

We will advertise the opportunity to talk to officers on the phone or to schedule a video conference. We will assess any COVID19 related restrictions in place at the time, but we hope to have drop in sessions with officers present around the Broads – probably 3 with one in the north, one central and one in the south of the Broads. If we are not able to do that, we will look into an online presentation and Q and A session.

Hard copies

We will reflect any COVID19 related restrictions in place at the time, but we intend to place hard copies in libraries and council offices around the Broads. We hope to have hard copies at Yare House, probably viewable on an appointment basis.

Younger people

We will work with the Education Officer to ascertain what kind of groups he will be teaching during the time of the consultation and assess if there is scope to talk to those groups about the questions asked in the Issues and Options. We will also identify and email schools near to the Broads to understand how they can help with this consultation. We will also liaise

with sports clubs and organisations that involve young people that operate in the Broads to ask if they can help engage young people.

Those that live on boats

We will ask the Residential Boat Owners Association to share the consultation details with any members they have locally. We will also write to boat yards with permission for people to live on boats to also share with their tenants.

Older people and disabled people

If we do hold drop in events, we will ensure the venue is easily accessed. We will also consult representative groups.



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**The Existing Housing Stock**

The following is one of the draft sections of the Issues and Options. It relates to the existing housing stock. Members' thoughts are welcomed as we finalise this section of the Issues and Options.

Introduction

When new buildings are built, they will need to meet the Building Regulations that are in place at the time of the build. In terms of replacement dwellings, they will likely result in an improvement in the energy performance of the building, compared to what was there before. Section x explores energy performance of new build <<Planning Committee Members, this was discussed at [July 2021 Planning Committee](#)>>.

Issue

Local Plans and policies can influence buildings that are yet to be built but many more buildings have already been built. We would like to explore how we can influence existing buildings to use less energy and use energy wiser.

In the past, there have been grants from the Government or local authorities that aid with aspects of building energy performance like insulation and boilers. Recently, there was the Green Homes Grant scheme<sup>1</sup>.

**Question: Do we need to do more about the existing housing stock?**

On occasion, applicants propose extending their existing buildings. The extensions will be built to the Building Regulations in place at the time of construction<sup>2</sup> and so the extension may well use much less energy than the existing main dwelling.

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<sup>1</sup> [Green Homes Grant: make energy improvements to your home - GOV.UK \(www.gov.uk\)](#)

<sup>2</sup> Broadly, the Part L requirements apply to buildings, or extensions of such buildings (except those of Class 7 type (see below)), or the carrying out of any work to or in connection of any such building or extension where the building:

- is a roofed construction having walls; and
- uses energy to condition the indoor climate

Source: [Exemptions from building regulations | Building Regulations | Planning Portal](#)

Class 7: The extension of a building by the addition at ground level of—

(a) a conservatory, porch, covered yard or covered way; or

(b) a carport open on at least two sides;

where the floor area of that extension does not exceed 30m<sup>2</sup>, provided that in the case of a conservatory or porch which is wholly or partly glazed, the glazing satisfies the requirements of Part N of Schedule 1

Source: [The Building Regulations 2010 \(legislation.gov.uk\)](#)

**Question: Is there scope to require an existing building that is to be extended to itself use less energy?**

#### Permitted development

There are some types of extension that do not need planning permission and so any policy approach would not apply to those schemes.

#### Energy Performance Certificates

Energy Performance Certificates (EPCs) tell you how energy efficient a building is and give it a rating from A (very efficient) to G (inefficient). They'll tell you how costly it will be to heat and light your property, and what its carbon dioxide emissions are likely to be. An EPC also includes information on what the energy efficiency rating could be if you made the recommended improvements and highlights cost effective ways to achieve a better rating<sup>3</sup>. Of course, if the EPC already rates the building as efficient, there may not be a requirement to move up the EPC ratings<sup>4</sup>.

**Question: Is there potential to require a building that is to be extended to improve its EPC level – perhaps it is required to move up one level on the EPC ratings?**

#### Buildings that may be difficult to make more energy efficient/use less energy

The age and style of buildings in the Broads is varied. As such, it may be that some buildings are harder to make more energy efficient than others; perhaps they are designed to have the very ventilation that some energy efficiency measures may seek to address for example. This would be an area to explore if a policy approach is taken forward.

#### Benefits to occupier

Improving energy efficiency and reducing operational carbon emissions has the benefit of lowering utility bills for occupants.

#### Options

A: Do not seek to address the energy efficiency of the existing housing stock

B: Require the building to move up the EPC rating.

C: Require that a certain percentage of the budget spent on the extension is spent on improving the energy performance of the existing building.

**Do you have any thoughts on this issue?**

**Do you have any preference on the options listed above?**

**Are there any other options to consider?**

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<sup>3</sup> [Guide to Energy Performance Certificates - Energy Saving Trust](#)

<sup>4</sup> Access to Energy Performance Certificates and Display Energy Certificates data for buildings in England and Wales: [Energy Performance of Buildings Data England and Wales \(opendatacommunities.org\)](#)



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**Peat**

The following is one of the draft sections of the Issues and Options. It relates to peat. Members' thoughts are welcomed as we finalise this section of the Issues and Options.

**1. Introduction**

In the last Local Plan, we introduced a policy relating to peat. The aim of the policy was to reduce the amount of peat excavated and to ensure that any peat that is excavated and/or is disposed is treated in a way that addresses its special qualities. We also have a [guide](#) relating to the excavation of peat.

Peat is an abundant soil in the Broads and an important asset, providing many ecosystem services, including food production:

- **Climate change:** The soils formed by the Broads wetland vegetation store 38.8 million tonnes of carbon<sup>1</sup>. Peat soils release previously stored carbon when they are dry. Peat, if dried out, can emit 174kg of CO<sub>2</sub> per cubic metre of peat.
- **Biodiversity:** Peat soils support internationally important fen, fen meadow, wet woodland and lake habitats. At least 500 species are primarily associated with peat habitats in the Broads (source: Broads Biodiversity Audit). It is critical that development avoids impacts on irreplaceable habitats.
- **Archaeology:** Historic England has identified the Broads as an area of exceptional waterlogged heritage. Because of the soil conditions in the Broads, there is great potential for archaeology to be well preserved, giving an insight into the past.
- **Palaeoenvironments:** The peat has accumulated over time and thus incorporates a record of past climatic and environmental changes that can be reconstructed.
- **Water:** Peat soils help prevent flooding by absorbing and holding water like a sponge (peat holds 20 times its own weight in water) as well as filtering and purifying water.

**2. Issue**

The Sixth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) warns that the world is heading for temperature rises above 1.5°C as we witness widespread extreme weather and other changes likely to be irreversible for centuries to millennia.

Peat is a finite resource, taking thousands of years to develop under the right conditions. Indeed, the Government's Peat Action Plan (May 2021)<sup>2</sup> states how important it is to keep peat wet, refers to how to restore peat as well as protect peatlands.

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<sup>1</sup> NCA Profile 80, Natural England and the Broads Authority's Carbon Reduction Strategy:  
[www.broads-authority.gov.uk/\\_data/assets/pdf\\_file/0011/400052/Carbon-reduction-strategy.pdf](http://www.broads-authority.gov.uk/_data/assets/pdf_file/0011/400052/Carbon-reduction-strategy.pdf)

<sup>2</sup> [England Peat Action Plan \(publishing.service.gov.uk\)](https://www.gov.uk/government/publications/peat-action-plan)

Given the impact of carbon dioxide release and loss of habitat, and as these are related to peat locally as set out above, we wonder if there is reason to take a firmer stance on the excavation of peat, particularly large-scale peat extractions and multiple small-scale excavations (for their cumulative impacts). And then, when peat is excavated, that there is a stronger stance of disposing of the peat so it remains wet and does not release carbon dioxide.

### **3. Options**

- A. Do not the change the approach as set out in policy and in the guide – so roll forward current approach.
- B. Change the emphasis so there is a stronger requirement to dispose of peat in a way that prevents it drying out. The current approach to excavating peat would be continued.
- C. Change the emphasis to reduce significantly the amount of peat excavated in the first place by making the policy stance stronger. This could be through a presumption against the excavation of peat. That being said, there would need to be circumstances where some small-scale development would be considered, perhaps using set criteria and following the mitigation hierarchy. The current approach to disposing of excavated peat would be continued.
- D. Combine options B and C – so that less peat is excavated and for any that is excavated, there is a stronger requirement to dispose of peat in a way that prevents it drying out.

**Do you have any thoughts on protecting peat?**  
**Do you have any thoughts on the options listed above?**