

**Consultation Documents Update and Proposed Responses**  
Report by Planning Policy Officer

<p><b>Summary:</b> 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.</p> <p><b>Recommendation:</b> That the report be noted and the nature of proposed response be endorsed.</p>
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**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

## Planning Policy Consultations Received

<b>ORGANISATION:</b>	Wroxham Parish Council
<b>DOCUMENT:</b>	Wroxham Neighbourhood Plan – pre submission draft
<b>LINK</b>	<a href="#">Wroxham Neighbourhood Plan</a> (pre-submission draft) <a href="#">Sustainability Appraisal</a> (supporting document)
<b>DUE DATE:</b>	1 September 2018
<b>STATUS:</b>	Pre submission draft
<b>PROPOSED LEVEL:</b>	Planning Committee endorsed
<b>NOTES:</b>	<ul style="list-style-type: none"> <li>• The Wroxham Neighbourhood Plan is a community-led document for guiding the future development of the parish. It is about the use and development of land over the next 20 years.</li> <li>• This is the first draft version of the Wroxham Neighbourhood Plan, prepared for ‘presubmission consultation’. For the six-week period between 21st July and 1st September 2018, local residents, businesses and statutory agencies will have the opportunity to comment on the draft Plan. During September and October 2018 all comments will be collated and considered. The Plan will then be amended before submission to Broadland District Council and the Broads Authority.</li> </ul>
<b>PROPOSED RESPONSE:</b>	<p><b><u>Neighbourhood Plan</u></b></p> <p>We particularly welcome and support the following aspirations relating to access:</p> <ul style="list-style-type: none"> <li>• Linking existing access routes to provide a more joined up access network</li> <li>• Creation of a Green Loop for Walkers and Cyclists</li> <li>• The ambition to have separated walking and cycling routes in the design for Broadland Way and routes linking to it from Wroxham</li> <li>• Provision of new green space and access to water/views of water.</li> </ul> <p>The one thing that isn’t mentioned though is short stay visitor mooring provision which is the thing we get most requests for in the area from private boat owners, the BHBF and customers.</p> <ul style="list-style-type: none"> <li>• Introduction. <ul style="list-style-type: none"> <li>○ First para: Is the time period an issue? 2019-2039. Local Plans are being produced until 2036.</li> <li>○ First para: As written, implies Wroxham Parish Council will determine planning applications, but they will not. Perhaps amend to say that you will use it for the basis of responses to planning applications?</li> <li>○ Third para: ‘Once adopted, the Plan will become a statutory planning policy document sitting alongside the Local Plan’. Suggest Local Plan is made plural and reference made to the Greater Norwich and Broads Authority Local Plans.</li> </ul> </li> <li>• Page 8, last paragraph, could the shared use of town centre, library, train station</li> </ul>

	<p>and school for example be mentioned here? This is mentioned on page 35.</p> <ul style="list-style-type: none"> <li>• Footnote of page 9 are not readable – they seem to overlay each other.</li> <li>• Page 12 – Local Plan for the Broads likely adopted by end of 2018.</li> <li>• Page 12 – Core Strategy 2007 is not mentioned in the list of Broads Authority documents.</li> <li>• Page 14, Community engagement and consultation. Typo. <i>‘More details of all the consultation are will be outlined in a Consultation Statement...’</i></li> <li>• Page 19 – vision. Regarding the iconic location, is that reference to being on the Broads? Would that be something worthy of a mention in the vision?</li> <li>• Page 20 - Objective 7: ‘To both protect existing and develop appropriate new access to the river and broads for recreation.’ I believe fits it better in to Objective 6 which focuses on walking and cycling. The ‘Environment and Landscape’ chapter context/introduction does not mention new access routes or public enjoyment. It also does not cover the fact that public access can create disturbance which can be harmful for wildlife. It will be worth adding that any new access needs to consider the impact on wildlife and develop opportunities to enhance wildlife itself, interpretation of the natural environment and wildlife viewing.</li> <li>• Page 22, bottom – Appendix x – presume x is wrong?</li> <li>• Page 22/23 – if the JCS suggests 100 to 200 dwellings, would the impact on services and facilities be the same if it was provided through windfall or an urban extension?</li> <li>• Page 23 – what is organic growth of the village? You refer to the historic windfall rate. By organic growth, do you mean growth of around 5 dwellings a year?</li> <li>• Page 23 – there is mention of Wherry Gardens being completed but not adopted. What do you mean by not adopted? Do you mean the roads have not been adopted?</li> <li>• Page 23 – there is mention of Wroxham not being a tourist destination, but earlier on in the Plan there is mention of Wroxham being the capital of the Broads. Page 31 also talks of the importance of tourism to the economy.</li> <li>• HBE1 – you could replace small scale with the wording on the footnote? When you say homes for residents, do you mean market dwellings?</li> <li>• Page 23 – you could reference the Central Norfolk SHMA’s figures that show population projections for Broadland as a whole that show an older population in</li> </ul>
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	<p>future?</p> <ul style="list-style-type: none"> <li>• HBE2: uses the word ‘should’ rather than ‘must’. What is ‘significant’? Last bullet point; so would you expect the Local Planning Authority to remove all Permitted Development rights of new development so applications will be needed for extensions to give the community the opportunity to object?</li> <li>• HBE3: uses the word ‘should’ rather than ‘must’. Looking at Appendix C, this shows what the situation is now so according to HBE3, development needs to be like the rest of the development in that particular area, but deficiencies and issues are identified in Appendix C so is it the intention that new development should mirror those deficiencies or do better? Is there scope of Appendix C to give guiding principles to enable better development that is already there rather than describe what is there already? Perhaps Appendix C could have elements of the area to preserve and elements to enhance? What are the dos and do nots for those areas? Perhaps along the lines of ‘the community would like to see more of xxxx and less of xxxx’? Criterion E is a little short sighted given the current effects and continuing threat of pests and diseases and climate change. Would recommend amending to something like <i>‘Have substantial and diverse tree planting throughout, appropriate to the locality.’</i> Might even consider omitting the term ‘tree’ and try <i>‘Have a substantial and diverse range of planting throughout, appropriate to the locality’</i></li> <li>• HBE4: the statement referred to in this policy; could that also be a way to demonstrate how a scheme meets HBE3? See above regarding Appendix C. Would it be prudent to refer to the Conservation Area Appraisal and the reasons why buildings are listed?</li> <li>• Page 28 – that map shows the current situation. You could add a map of the Growth Triangle area that shows the area that will be developed in future? That may justify this policy to a greater extent.</li> <li>• Page 30 – you can get up to date data here: <a href="https://www.nomisweb.co.uk/reports/lmp/la/1946157233/report.aspx?town=Wroxham">https://www.nomisweb.co.uk/reports/lmp/la/1946157233/report.aspx?town=Wroxham</a></li> <li>• Page 32 – how do takeaways make somewhere less attractive?</li> <li>• BUS2 – there is reference throughout the Plan of not wanting holiday homes. In this policy, it says that holiday homes proposed by businesses will not be encouraged. It is not clear how that wording will influence the determination of applications for such uses. The same with ENV3.</li> <li>• Page 33 – not just the Norfolk Broads, but Norfolk and Suffolk Broads. Or just ‘Broads’.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Page 35, last para and Policy COM1 Point on clarity of the text; reads as though the bridge from Hoveton is south of the village.</li> <li>• BUS3 – what is small scale? Ten or less like for housing? Perhaps explain that. Where it says ‘Do not displace a potential residential or other business use’ how will that be judged? Last bullet point – there is an and/or is that the intention?</li> <li>• COM1; In addition to aesthetics, consideration would be better given to species diversity, wildlife benefit and ease of maintenance.</li> <li>• COM2 – redevelopment into what? What if away from community uses?</li> <li>• COM3 – the second part of COM3 does not fit with the title; it seems to be about design. Welcome that biodiversity will be protected and enhanced. This could be more specific, for example referencing native planting and wildlife friendly management specifications that are put in place (e.g. mowing regimes).</li> <li>• Page 40 – section introduction and statistics – is there a commentary of these statistics to explain the trends?</li> <li>• TRA2 – how does this relate to the parking standards of Broadland Council or Norfolk County Council?</li> <li>• TRA3 - new rights of way and/or circular walks as a form of local recreation/ A to B could be included here to tie into policy COM3 and ENV1/ENV2 to create a network of public routes and spaces, thus enhancing local Green Infrastructure network.</li> <li>• Page 44 – there is reference to the impact on congestion of through traffic, but nothing about car trips originating from Wroxham. Is there scope, perhaps as a project, to look at how residents get around and perhaps promote alternatives to the single occupancy car use?</li> <li>• ENV2 – the policy refers to open space – should that be Local Green Space? If it is meant to say open space, then the title does not fit with this.</li> <li>• ENV3: Bio-diversity could be expanded to include the examples (integrated nesting boxes within buildings, native hedge planting for boundaries, flower-rich meadow areas), and therefore be more similar to ENV6: Climate change.</li> <li>• ENV4 – confused by ‘in addition to those identified in the Wroxham Conservation Area Character Statement’ – are you saying there are other important views? If so, you could add these to the maps as well?</li> <li>• Page 49 - Could ‘Raptors lurk overhead’ be amended to ready ‘Raptors soar</li> </ul>
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overhead', which is more accurate.

- Page 50 please amend the following: 'The Broads Authority has management plans to deal with invasive non- native species. Care should be taken that development does not contribute to the spread of these plants and animals.' To this suggested version: 'The Norfolk Non-Native Species Initiative, which include the Broads Authority, provide advice to landowners. It is the responsibility of landowners to prevent invasive non-native plants on their land from spreading into the wild and causing a nuisance. Care should be taken that development and associated use activities do not contribute to the spread of these plants and animals.'
- Page 54 – suggest it is made clear that there is a CIL in Broadland but not in the Broads Authority.
- Page 58, section 3 bullet point one; use of the word lethal. Is this an appropriate term? Does the accident data in the area indicate this? Do you mean that the road means it is not attractive to cycle along?
- Paragraph numbers help DM Officers reference parts of the Plan.
- Bullet points in policies could be numbered again to help reference.

#### **Sustainability Appraisal**

- 2.2 – table. Suggest header row repeats so header on each page. ENV3 versus 5 and 6 – suggest green as by reducing traffic you will address air quality. SOC1 versus 4 – social exclusion could be addressed by the aim number 4.
- 3.2 table. Suggest header row repeats so header on each page. TRA1 and TRA3 versus ENV6 could be green. COM2 and COM3 versus SCO1 could be green and for SOC5.
- Section 4 table: Suggest header row repeats so header on each page. Also, the indicators, how will they be measured? How readily available is the data? Can it be collected annually? I am not sure how people travelling to work in a more environmentally friendly manner can be measured for example.