

Planning Committee

08 January 2021

Agenda item number 11

Planning policy- consultation responses

Report by Planning Policy Officer

Summary

This report presents the officer's proposed response to planning policy consultations received recently by the Broad Authority, 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 Broads Authority since the last Planning Committee meeting, together with the officer's proposed response.
- 1.2. Members' comments, guidance and endorsement are invited.

Author: Natalie Beal

Date of report: 14 December 2020

Appendix 1 – Planning Policy consultations received

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Organisation: Beccles Town Council

Document: Beccles Neighbourhood Plan

Due date: 08 February 2021

Status: Regulation 16 – pre-submission version

Proposed level: Planning Committee endorsed

Notes

This document represents the Neighbourhood Plan for the town of Beccles for the period 2019 to 2036. The Plan contains a vision for the future of Beccles and sets out clear planning policies to realise this vision. The principal purpose of the Neighbourhood Plan is to guide development within the town. It also provides guidance to anyone wishing to submit a planning application for development within the town. The process of producing a plan has sought to involve the community as widely as possible. The different topic areas are reflective of matters that are of considerable importance to Beccles, its residents, businesses and community groups

Proposed response

Summary

The Plan seems well written and we are generally supportive of it. There are some policy areas that we feel need improving, in particular where the Plan refers to materials, how it refers to the Broads Authority and related documents and dark skies. The main comments are set out in the following section, with other comments after that.

Main comments

- 4.33 – Depending on the location, character and context, UPVC might not always be acceptable. As such, this needs to say that this depends on the scheme and its location and also design advice of experts at the Local Planning Authorities. Our Heritage and Design Expert has concerns about this. Given that much of the Beccles Conservation Area is covered by an Article 4 direction which controls the replacement of windows (there is an Article 4 direction), this wording might be in opposition to the advice being given by the LPAs in most instances, or certainly where the works relate to a historic building or building in a sensitive location – which most of the CA will be. They need to refer to the Article 4 direction (perhaps include it as an appendix?) and the policy should state that ‘where windows are being replaced on a historic building, timber windows should be replaced on a like-for-like basis or opportunities taken to enhance the appearance of historic buildings by reinstating timber windows of traditional design where they have been lost.’ They could perhaps go on to state that in some instances UPVC windows may be considered appropriate where they are of high

quality and good design and the building is not of historic importance or in a sensitive location.

- Para 4.35 doors: Our Heritage and Design Expert has concerns about this and suggests you replace 'have a major impact on' with 'contribute greatly to'. I would be wary of saying that new development should use 'Georgian or Victorian-style' doors and doorcases, so would remove the phrases 'wherever possible' and 'should' but they could perhaps say 'where appropriate they could be used on new development'.
- P33 red box – Community Actions – mention is made of degradation of the CA through inappropriate advertisements. Should there be a specific policy on shop signage and advertisements as this does have a major impact on the town centre (eg appropriate in scale, materials, type and level of illumination, number of signs, banner signs etc)?
- BECC9 – Considering the emphasis that the Plan makes on walking and cycling and tackling car use, it seems prudent that this policy should mention cycle parking and electric vehicle charging points.
- Policy BECC10C Replace with: 'Proposals should seek to avoid any adverse impact on heritage assets (including archaeological assets) on the development site or in its surroundings.'
- BECC10 E – Any development of any size can impact the considerations in this part of the policy. It is more about the location, context, character and proposed design than the size or scale, although of course size and scale can have an impact. It is not clear why a threshold of 10 or more has been used. This is an area that needs further consideration as it seems prudent that all development considers these aspects.
- BECC11 – With the Plan having such emphasis on promoting cycling, it seems prudent that this policy should include cycle parking.
- BECC11 Part C – please be aware that the Broads has intrinsically dark skies and seeks to address light pollution through its Local Plan. Low energy lighting is one consideration, but the need for lighting in the first place, how it is pointed so as not to add to light pollution are other considerations that need to be put in the policy.
- Policy BECC11G: it should seek – 'not to adversely affect any heritage assets on the development site or in its surroundings'.
- I wonder if somewhere they need to define what they mean by 'heritage assets'. They could then just refer to 'heritage assets' rather than 'historic architectural or archaeological assets' as they have done. Obviously, there is a difference between 'designated heritage assets' and 'heritage assets', which would include locally identified heritage assets as well as all of those that are designated (SAMs, LBs, CAs, RPGs). This wider term would probably be the most appropriate term for them to use.
- P60 Heritage / Conservation Area 'enhance its character and appearance' rather than quality. Partners should be the BA as well as ESDC.

- Page 61, lighting row - please be aware that the Broads has intrinsically dark skies and seeks to address light pollution through its Local Plan. Lighting near the Broads should be thoroughly justified and well designed so as to not add to light pollution. Perhaps the Broads Authority should be a partner as well.
- Better reference to the Broads: The following changes are requested to better refer to the Broads and the Broads Local Plan. They are fairly minor in nature and do not necessarily affect policy direction, but it is important to ensure the context is correct:
 - Do you want to mention what the Local Plan for the Broads says about Beccles – like allocating residential moorings at Hipperson’s Boatyard etc?
 - 1.10 – what about the vision in the Local Plan for the Broads?
 - 4.26 – and Broads Local Plan
 - 4.29 – Broads has undesignated heritage assets too. The Conservation Area is partly in the Broads.
 - Page 60, Conservation area row, add Broads Authority - as part of the CA is in the Broads.

Comments relating to evidence

- Figure 2.1 – In September 2019, the Indices of Multiple Deprivation were updated. Does this section therefore need updating?

Observations

- 2.9 and actions on page 38 and then 5.9 – is there a slight contradiction here. People saying that there is too much traffic in the town, but that parking should be cheaper, but more need to walk and cycle.

Queries/suggestions

- The introduction says that Beccles is the gateway to the Broads, but the challenges, objectives and vision do not mention the Broads. Should they?
- 2.10 – is there any monitoring to show if there is less traffic in the town as a result of the relief road which is now in place?
- The Beccles Today graphic, pages 14-17. It might be that I’m reading it wrong but some of the statements below the diagrams don’t seem to correspond to the information contained within them – eg ‘Large proportion of retirees, smaller number of working people’ – to me the graphic shows a smaller number of retirees (total of 27%) against a higher proportion of working people (total 47% - or potentially 7% more than that if you add 18-24 year olds); ‘lots of small 2 bed houses and fewer larger family houses’ the proportion of 3/4/5+ houses (59%) is actually more than the number of 1 or 2 bed houses (41%).

- 5.19 – do you wish to have a local standard for electric vehicle charging points, until a national standard comes in?
- Should Policy BECC3 make reference to the provision (or at least consideration) of interpretation as part of any proposals?
- Policy BECC4 suggests the re-use of existing buildings for hotel accommodation, which might be fine. However, should there be something to say ‘and for the re-use of existing historic buildings, provided the conversion is not detrimental to the significance of the building or its historic fabric’.
- BECC5 f: ‘Provide clear justification *and a description of mitigation measures...*
- BECC5 C – ‘and mitigation measures’.
- BECC6 – where does the traffic come from? Is it mostly short journeys starting within and ending in Beccles? If so, is there a community project that tackles travel behaviour of people rather than focusing on the impacts of vehicles or focussing on just hard infrastructure?
- BECC6 wording, in relation to cars and movements of motor vehicles uses ‘must’. Whereas the wording in BECC7, to do with walking and cycling, is ‘encouraged’. Does that need thinking about considering the emphasis in the Plan about seeking better walking and cycling facilities?
- BECC12 D – how does that fit with the EA and NPPF and our Local Plan requirements? Is it different? If so, what is the justification? If it is the same, is it needed?
- P50-51 – lots of mention of the importance of public spaces – provision for the ongoing and regular maintenance of these spaces should be considered and included in Policy BECC10F
- Section 7 – anything about the healthy design of new development? Anything about active lives etc?
- 8.11 – is there merit in referring to the Future Homes Standard that is being considered by the Government?

Comments relating to access and recreation

- Consider lowering the quay heading in places to allow specific use for canoeists/kayakers to get in and out of the water. If not possible then consider small floating pontoons to promote paddle sports.
- Consider increasing the number of cycle routes and cycle parking facilities. This could be achieved by upgrading current footpaths or creating cycle lanes on any new paths.
- There has also been a lot of queries from anglers concerning where they can fish from in and around Beccles. Could some areas be dedicated for fishing?

Comments relating to formatting

- BECC11 – bullet point number is a bit odd – maybe make the sub bullet point of A numbers or Roman numerals (minor point)

Organisation: Lound and Ashby, Herringfleet and Somerleyton Parish Councils

Document: Lound with Ashby, Herringfleet & Somerleyton Neighbourhood Development Plan

Due date: 26 February 2021

Status: Regulation 14 draft

Proposed level: Planning Committee endorsed

Notes

This is the draft Neighbourhood Plan and Draft Design Guide.

Proposed response

The Broads Authority welcomes the draft Plan and Guide, but there are some areas that need consideration. For example, better reference to the Broads, clarification as to whether a site is being allocated and amendments to the design guide to reflect that part of the area is in the Broads.

Main comments

Neighbourhood Plan

- Objectives – should landscape and the Broads be mentioned in the objectives? They are mentioned in the vision.
- LAHS1 only includes numbers of bedrooms, but 7.1.7 implies that it endorses design elements – but the policy does not say that. You may wish to clarify 7.1.7 and LAHS1.
- 7.2.2 – what about the fact that with less than 10 dwellings there is likely to be no affordable housing. Does that contradict the objectives and vision? Especially the social objectives.
- 8.1 para 2- what about mitigating climate change – reducing emissions in the first place? This section talks of adapting to a changing climate and not reducing emissions.
- 8.1 we suggest this change ‘New developments will be expected to ~~take into account the impacts on~~ **enhance** biodiversity and climate change’ needs to be updated to keep step with new biodiversity gain requirements.
- Map on page 11 shows a Neighbourhood Plan allocation. I think it is called LAHS4, but it is not clear on the map. LAHS4 however is a design policy. Is the Neighbourhood Plan allocating the land shown as blue on the map on page 11, and if so, where is the policy?

Design Guide

- The design guide does not adequately reflect the Broads. There are many comments made on the design guide below. The issue is that what is in the design guide is effectively made policy by policies in the Neighbourhood Plan. The design guide needs to be amended to reflect the Broads and related documents and our comments.

Neighbourhood Plan

- 1.3 – and the Broads Authority.
- 4.0, vision says ‘natural landscape tranquillity’. Should there be an ‘and’ before tranquillity?
- Objectives – should landscape and the Broads be mentioned in the objectives? They are mentioned in the vision.
- LAHS1 only includes numbers of bedrooms, but 7.1.7 implies that it endorses design elements – but the policy does not say that. You may wish to clarify 7.1.7 and LAHS1.
- LAHS1 Housing Mix. What does ‘preference’ really mean? As a developer do I need to just say ‘I can make more money on one 5 bed house’ and that will be accepted as ok? Do they want a more formal sequential approach? Do you want a more robust approach?
- 7.2.2 – what about the fact that with less than 10 dwellings there is likely to be no affordable housing. Does that contradict the objectives and vision? Especially the social objectives. I note that there may be a temporary increase in the threshold for affordable housing, muted by the Government as 40/50 dwellings, but that is temporary.
- 7.2 and 7.5 and 9.2 part of 9.3 and 9.4 – there is no policy. So, is this section just commentary? How would Development Management Officers at the LPAs be expected to use this section? Can its status be clarified? Is it just background?
- The photo on page 10 – what is that linked to? Is it meant to show the green space, parking or homes?
- Should section 7.3 refer to the allocation for residential moorings at Somerleyton Marina in the Local Plan for the Broads? The design principles may not apply, but reference to that might be prudent to show that the NP acknowledges various types of housing need.
- 7.3.5 – and the Local Plan for the Broads.
- The para after 7.4.3, 7.5.8 may need a number?
- LAHS3 – it would be prudent for the supporting text to refer to the open space policies in the Waveney Local Plan and Local Plan for the Broads. It could be stated that LAHS3 builds on those.
- 8.1 – para numbers have gone after this – the numbering is not the same from now on as before this section.
- 8.1 para 2- what about mitigating climate change – reducing emissions in the first place? This section talks of adapting to a changing climate and not reducing emissions.
- 8.1 does not mention the Broads.

- 8.1 we suggest this change ‘New developments will be expected to ~~take into account the impacts on~~ enhance biodiversity and climate change’ needs to be updated to keep step with new biodiversity gain requirements.
- 8.3.4 – is there scope for a community project to tackle this? Perhaps a school travel plan?
- 8.4 – and the Local Plan for the Broads.
- LAHS6 – have you liaised with Suffolk County Council Highways about this? Also, with East Suffolk?
- Map on page 11 shows a Neighbourhood Plan allocation. I think it is called LAHS4, but it is not clear on the map. LAHS4 however is a design policy. Is the Neighbourhood Plan allocating the land shown as blue on the map on page 11, and if so, where is the policy?
- The Plan is lacking in detail on Objective Env 6 ‘To plan for climate change, biodiversity and landscape conservation’. The mechanism for the creation of the plan and proposals where action could be lacking are missing.
- Could the plan set out where and how enhanced provision of biodiversity is going to be provided. This could be around the school, green, church, parish hall and the mardle (pond).
- Other elements to add that are missing:
 - Reference to the published aspirations of landowners to enhance biodiversity. [WildEast - A Movement of People, For Nature, Forever In East Anglia](#)
 - Any aspirations or proposals for first time rural sewage provision to reduce the nutrient input into the waterways via the groundwater and thus protecting biodiversity

Basic Conditions Statement

Page 9 – assessed Waveney Local Plan but does not assess the Broads Local Plan. Please can you add a similar table for the Broads Local Plan?

Design Guide

- In terms of the special qualities of the Somerleyton village itself, you would say that one of the most distinctive things about it is the cottages presumably built by the estate and giving it almost the appearance of an ‘Estate village’. I can understand why they have therefore focussed on that in terms of their policies / design guide for the main village itself. However, the village is on the edge of the Broads and the western edge is within the BA area so this does need to be considered.
- Page 7 talks of three allocations. See comment previously about the NP map showing one allocation with no policy. Can this situation be clarified please?

- Page 7 – last set of bullet points. Why have no Broads Authority documents been considered/assessed/mentioned?
- Page 7 – reference is made to Homes England’s Urban Design Compendium (2013). Better reference might now be made to the National Design Guide, October 2019.
- Page 7 – should the 4 sites include the one at Herringfleet Marina – albeit a slightly different form of development.
- Page 7 – and BA Local Plan 2019 and Design Guides
- Page 8 – within Waveney DC (now East Suffolk) and BA
- Page 9 – I’m not sure why para 196 of the NPPF re: the designation of CAs is included?
- 3.2.2 – Parts of Somerleyton fall within the BA Executive Area and we therefore perform the role of LPA in this area. Need to include relevant policies from the BA Local Plan and other relevant docs re moorings / waterside buildings and ‘Keeping the Broads Special’ etc. This does not mention the adopted Local Plan for the Broads and it needs to.
- Figure 5, page 10-11 – don’t forget that there is an allocation for residential moorings at Somerleyton Marina – see Local Plan for the Broads.
- Pages 13 can the Marina allocation be shown on the Somerleyton Plan?
- Page 14 – make reference to the ‘wooded ridge’ which runs along the eastern edge of the Herringfleet Marshes and forms quite a local landscape feature? The differentiation in height is clear from the plan.
- Page 14 – for planning purposes, the Broads is not a National Park. The Broads has a status equivalent to a National Park.
- 3.2.5 says: ‘The large grade II* listed was originally Tudor-Jacobean but what you see today is largely Victorian’. Seems that there is a word like ‘building’ missing.
- 3.2.5 – this needs vast improvement. Somerleyton is partly within the Broads. As this section is about culture, there is much to say about the culture of the Broads. The paragraph might be ok, but the reference to the Broads Plan should be removed. Perhaps replace with ‘Broads’ and go on to say the cultural aspects of the Broads.
- Page 15 last para – the Conservation Area is part in the Broads and part in ESC areas. The Broads itself is a landscape designation and this section needs to say that. The Broads is not split – it covers Norfolk and Suffolk, but it is the Broads. Somerleyton falls within the Broads, not Broads Plan. As such, the settlement has strong cultural traditions linked to the wider Broads area.
- Page 15 – grade II* listed Smock Mill at Somerleyton (Herringfleet mill) as well. I’m not sure that I would agree with the statement that the CA designation gives protection to all of the buildings and would suggest this is removed. They could say that ‘buildings

within the CA have some different permitted development rights and development is expected to enhance the conservation area’.

- Section 3.2.7 needs to mention and assess our Landscape Character Assessment.
- Page 18 – mention of Somerleyton (do they mean Herringfleet?) Mill and engine house at the east of the area – do they mean west?
- Page 23 says ‘In Lound the public footpath leads east from Blacksmith’s Loke where it splits and heads east to Hopton-on –Sea or south towards Church of St John the Baptist on Church Lane should be retained and enhanced in future development’; I don’t think this makes sense. It needs a read and re-wording.
- Page 23. What is ‘River Waveney Special Area’? Could they just say should link to public footpaths along the river, if that is what they mean?
- Page 23 ends with an ‘and’.
- 4.1.5 bullet 2 – Broads Plan or Local Plan for the Broads? Probably the latter.
- Page 27 – The Broads Local Plan, not Broads Plan. Proposals within the BA Exec area need to comply with all of the Local Plan policies, in particular those on character and landscape sensitivity are of relevance to the Design Guide.
- Page 31 – bullet point 3 – ‘The existing character must be appreciated.’ – would it be better to remove this sentence which does not really mean anything – (how would a developer show they appreciate the existing character?) and just say ‘Architectural design should reflect the local character and the rural setting but should not stifle innovation’?
- Page 31 bullet 5 ‘Buildings should *be spaced* to allow glimpsed views of the surrounding countryside’?
- Page 31 bullet point 6 – do they really mean 2.5 storeys? They have stated on the two previous pages that maximum heights are two storeys and a lot of the buildings in the villages appear to be 1.5 storeys (eg all three buildings shown in the photo on this page). I would think a maximum height of 2 storeys would be a more appropriate scale for new development.
- Page 31, 7th and 10th bullet - complement rather than compliment?
- Page 31, bullet point 8 – support, but you may want to mention the dark skies in the Broads and the work we did and our policy.
- Page 31, penultimate bullet – locating cycle parking in discrete locations implies there will be a lack of natural surveillance or they could be located with the bins, which often happens. Please re think what you have written.
- Page 33 4.1.9 Design checklist – I wonder if some of this needs to be checked as some of the Design Elements and Descriptions don’t quite seem to go together or reflect

what has been discussed in the Design Guide eg Buildings Heights and Rooflines' description is about historic materials and architectural detailing – should it not be about height, roof form and chimneys? Connectivity talks about the linear pattern of development but should it not be about footpaths and access?

- Page 33 4.2 typo 'influence'
- 4.1.9 – is the checklist for the Local Planning Authority or the developer? If for the developer, did you want a yes or no answer, or did you want some explanation? If explanation, could the wording be 'how do you...?'
- How has the Conservation Area appraisal been used to inform this work?
- 4.3 – is this for the LPA or the applicant? Also, this seems generic rather than area-specific, which might be fine, but is there scope to reference local things, like the Broads?
- Section 6 – do you have any thoughts about design associated with the residential moorings allocation? You may not, but that allocation is not mentioned in this document.
- Building for a healthy life has been released. Should this be reflected in the Design Guide?
- There seems to be no reference to local plan policies on design from the Local Plan for the Broads.
- Page 49 Will there be a 'Concept Masterplan' for the Somerleyton Marina site allocation?
- Page 51 References – I would suggest that the National Design Guide should be a reference, as should the Local Plan for the Broads, 2019.

Supporting Evidence

- Section 5 – Character of Existing Somerleyton Village
- Page 13 plan – I was unsure whether the key is correct? The yellow is shown on the key as being 'Registered landscaped within the Conservation Area' by which I assume they mean parts of the Registered Park and Garden of Somerleyton Hall? But it appears to show quite a large number of houses in yellow which wouldn't come under this designation.
- Page 13e plan – should the BA Executive Area be shown on here too?