

Consultation Documents Update and Proposed Responses
Report by Planning Policy Officer

Summary:	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.
Recommendation:	That the report be noted and the nature of proposed response be endorsed.

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

ORGANISATION:	Broadland District Council
DOCUMENT:	New potential sites put forward by promoters of development.
LINK	http://www.broadland.gov.uk/housing_and_planning/3122.asp
RECEIVED:	14 October 2013
DUE DATE:	25 November 2013
STATUS:	Additional consultation on the principle.
PROPOSED LEVEL:	Endorsed by Planning Committee
NOTES:	The Council has decided to undertake a brief public and stakeholder consultation exercise relating to some new site proposals that have been promoted for future development across the district. These sites have been put forward by promoters of development (e.g. landowners/agents) in reply to their Preferred Options consultation exercise that was undertaken in the summer.
PROPOSED RESPONSE:	<p>General:</p> <ul style="list-style-type: none"> • The sites in Salhouse and Brundall are near to the Ramsar, SPA and SAC sites in the Broads. There could be indirect effects resulting from increased water extraction or effects from more residents visiting these areas. It is important that any impact is assessed (HRA). This is linked to the next comment. • Unlike the previous consultation, there is no detail (in terms of what a policy would say) to comment on. What is the next stage? <p>Brundall – important issues to consider/include when formulating a policy:</p> <ul style="list-style-type: none"> • Retention and enhancement of boundary hedges essential • Site needs to be buffered by provision of green space/buffer within the edges of the development that runs closest to the green river corridor to ensure that the development blends into the natural setting and enhances and protects the natural resources • Both sites are adjacent to the Witton run bring essential supply of water into the SAC/SPA/SSSI • Any development needs high performance on SUDS throughout, a high ratio of green space that is well located to compliment this sub catchment of the Broads, well planned lighting to ensure that this well used corridor for bats is not impacted, water efficiency to ensure that there is no significant impact on the SAC • The Witton run is an existing corridor for wildlife (nesting birds etc) and increased access for people and their dogs should be planned on the upland edge away from the river in the green buffer and require fencing to protect the river corridor wildlife and undisturbed views for users. • It is critical that the development fits into a catchment based approach which needs to be taken for the Witton Run and BDC should lead on seeking a local partnership with the PC, RSPB and other local groups to ensure that

	the essential natural capital is enhanced for residents and wildlife alike. RSPB are drawing up a catchment plan.
ORGANISATION:	Great Yarmouth Borough Council
DOCUMENT:	Core Strategy
LINK	http://www.great-yarmouth.gov.uk/work/strategic-planning/local-plan/core-strategy/index.htm
RECEIVED:	3 October 2013
DUE DATE:	8 November 2013
STATUS:	Pre—submission consultation (regulation 19)
PROPOSED LEVEL:	Endorsed by Planning Committee.
NOTES:	The Core Strategy is a key document in the emerging Local Plan setting out strategic policies for new homes, jobs, retail and leisure facilities, transport and local services as well as the environment. The Core Strategy also allocates two strategic mixed use development sites: one in the heart of Great Yarmouth along the riverside and the Beacon Park extension at land south of Bradwell. The policies in the Core Strategy and future Local Plan Documents will be used when decisions on planning applications are made.
PROPOSED RESPONSE:	<p>In principle the Broads Authority can support the overall strategic approach taken in the production of the document, which is clearly set out and comprehensive. It embraces the Broads, which is welcomed. There are, however, a number of areas where the document is somewhat ambiguous in its ambitions, in that a few of the detailed policies do not seem to reflect the aspirations set out in the justification.</p> <p>Given that the next stage of the document process is submission, any comments that are made must either be accepted by the Borough Council ‘minor modifications’ and sent to the inspector for consideration, or, if they do not accept them or they are too significant for ‘minor modification’, will remain as objections to the soundness of the plan and will be tested through EIP. Accordingly, care must be taken in how these are presented.</p> <p>The proposed comments seek to address the issues of ambiguity set out above, plus other more minor issues as relevant with the objective of improving the document as it relates to the Broads. The comments have been divided into significant and minor comments to assist the Borough Council in their consideration of these.</p> <p><u>More Significant Comments</u></p> <ul style="list-style-type: none"> • CS9 – b. This policy relates to design, but, having flagged this, then appears to play down the importance of design. The use of the words ‘consider’ at the start of the criterion and then ‘where practicable and appropriate’ seem, in combination, to play down the potential importance of this criteria. The bullet points in section 5.2.10 seem to be worthy of inclusion in this policy. Particularly the bullet point at the top of page 118. CS9 seems a very

important policy, particularly in relation to development proposals in areas of GYBC which are in the vicinity of the Broads. The BA would welcome early involvement on any scheme adjacent to its area.

- CS12 – g. The wording in the supporting text at paragraphs 4.12.13/14/15 and the SA page 56 seems to be a convincing argument for doing more than ‘encouraging’ water efficiency especially as the Plan Period is until 2029. Perhaps the Borough Council could consider setting targets for water efficiencies?
- Appendix 4. Public Transport, walking and cycling, biodiversity and open space provision are marked as ‘desirable’ in the table yet many policies and indeed the SA assessment seem to rely on provision of/for these items of infrastructure as important to the delivery of the Plan’s objectives. Is there a need for a third category of infrastructure between ‘critical’ and ‘desirable’?

Minor Comments on the Core Strategy

- Page 11: Suggest that Broads Landscape Character Assessment and Broads Biodiversity Action Plan and Broads Landscape Sensitivity Study for Wind-Turbines, Photo-Voltaic and Associated Infrastructure (<http://www.broads-authority.gov.uk/authority/publications/conservation-publications.html> and <http://www.broads-authority.gov.uk/planning/landscape-character-assessment.html> and <http://www.broads-authority.gov.uk/planning/landscape-character-assessment/landscape-studies/landscape-sensitivity-study-for-renewables-infrastructure.html>) are also local evidence base.
- References to the Norfolk Broads should be replaced by ‘Broads’ or ‘Norfolk and Suffolk Broads’ throughout the document.
- Map on page 18 should show the Broads Executive Area.
- Section 2.1.23 could perhaps usefully refer to the Broads Landscape Character Assessment.
- Section 2. It may be useful in the general description of the area to make mention of the relict estuary. The Great Estuary Story | Enjoy the Broads (<http://www.enjoythebroads.com/discover/videos/great-estuary-story>)
- In Table 4 it is suggested that the Broads Authority is a Relevant Authority for the following issues. Please also see our previous comment (Rep ID CS111) where some of this was raised (and indeed others)) but the agreement to amend text has not followed through.
 - ‘Encouraging improvements to the wider road...’ – the A47 travels through the Broads Authority Executive Area.
 - ‘Implications of sub-regional growth in the off shore...’ – we would like to emphasise the issue of the impacts on landscape (and consequently tourism and biodiversity) of the landing points of undersea cables, transformer stations and underground and over ground cables on the Broads. The Broads is an area renowned for its important landscape, biodiversity as well as for tourism and navigation. Inappropriate siting of supporting infrastructure for off shore and marine industry could harm these special qualities of the Broads. Broads Landscape Sensitivity Study for Wind-Turbines, Photo-Voltaic and Associated Infrastructure is of relevance.
 - ‘Minimising and managing flood risk’ – over 80% of the Broads Executive Area is prone to flood risk.
 - ‘Monitoring and Protecting Water Quality’ - Water quality in the Broads is critical to the area’s value for wildlife, and to its appeal for

	<p style="text-align: center;">recreation and navigation.</p> <p>Further to the above, the BA previously requested an additional entry referring to ‘protection and management of the Broads’ which has not been included (again in Rep ID CS111).</p> <ul style="list-style-type: none"> • 3.1.2 of the vision should include reference to Landscape – suggest in second sentence. • SO6, second bullet point should specifically mention landscape as this is important to the Broads Authority. • Policy CS4. As GYBC may be aware, the Broads Authority, when dealing with the potential for affordable housing requirements, uses the policy of the relevant District/Borough Council. This policy therefore will be relevant to the entire area of the Borough (including that part in the Broads Executive Area). Perhaps a reference to this might be useful. • Policy CS4. For clarity, does the percentage of affordable housing apply at, for example, ‘5 dwellings or more’ or ‘more than 5 dwellings’? • CS5 – have GYBC considered another useful criteria being access to supporting services, for example schools? This could be an important criterion for consideration when investigating areas for Gypsy and Travelers. • CS8 – m. The reference to Winterton-Horsey Dunes SAC is of interest to the Broads. GYBC may be interested in the Broads Sites Specifics Policy (submitted September 2013) XNS3. The Broads Authority would welcome involvement in the development of ‘a series of ‘early warning’ monitoring measures’. • CS11 – d and 4.11.14. Recommend that GYBC consider adding reference to the Broads Landscape Character Assessment here as well. Development proposals may be on or near to the Broads Authority Executive Area boundary. Also the Broads Plan (management plan for the Broads) is of importance to point c. With regards to point e, ‘buffering’ is not strong enough term considering the importance of the adjacent habitat and its designation, ‘buffering’ should be replaced with ‘enhancing and protecting the quality of the habitats, including buffering from adverse impacts’. • Point j, recommend change to ‘Working with developers and landowners to ensure land management practices protect and enhance landscapes and natural capital and to restore landscapes where valued features, habitats and service have been degraded or lost’. Point k, suggest to have reference to eco networks or GI. • 4.11.2 – liaison with the Broads Authority could result in benefit to the protected species. Suggest adding the Broads Authority as a key partner. Also the ‘Norfolk Biodiversity Partnership’ (as lead on the biodiversity action plans for the species listed and the coastal and wetland topic groups) as another partner. • 4.11.4 – last sentence. To clarify, the Broads Executive Area has a status equivalent National Park status. The difference is that the Broads Authority needs to protect the interests of navigation. The following information may clarify: The Norfolk and Suffolk Broads Authority was set up through a special Act of Parliament (The Norfolk and Suffolk Broads Act) in 1988 and began operating as a Special Statutory Authority in 1989. <p>It is the general duty of the Authority to manage the Broads for the purposes of:</p> <ul style="list-style-type: none"> • Conserving and enhancing the natural beauty, wildlife and cultural heritage of the Broads;
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- **Promoting opportunities for the understanding and enjoyment of the special qualities of the Broads by the public; and**
- **Protecting the interests of navigation.**

The Broads Act also sets down the need for the Authority to have **regard to the needs of agriculture and forestry, and the economic and social interests of those who live or work in the Broads.**

- 4.11.6. Reference to the Broads Landscape Character Assessment and Biodiversity Action Plan could be useful in this paragraph
- CS12 – c. Does the threshold include 10 dwellings (i.e. 10 dwellings or more)? Or is it for more than 10 dwellings only?
- CS12 – d. we would like to emphasise the issue of the impacts on landscape (and consequently tourism and biodiversity) of the landing points of undersea cables, transformer stations and underground and over ground cables on the Broads. The Broads is an area renowned for its important landscape, biodiversity as well as for tourism and navigation. Inappropriate siting of supporting infrastructure for off shore and marine industry could harm these special qualities of the Broads. Broads Landscape Sensitivity Study for Wind-Turbines, Photo-Voltaic and Associated Infrastructure is of relevance.
- 4.13.18 – the date of completion of the SWMP has passed.
- Page 94. It is unclear how SUDS can reduce water consumption, as this would depend on the type of SUDS used which is not set in policy. This SA Objective assessment could depend on implementation rather than being positive.
- The dualling of the A47 is mentioned throughout the document. It is recommended that the constraints that result in this scheme likely to be a long term project be explained. These will include the impact on the protected landscape and ecological assets of the Broads.
- CS17. Parts of the waterfront area are next to the Broads Executive Area yet there is no reference to the Broads or the involvement of the Broads Authority. The Broads Authority would welcome involvement as the AAP progresses.

Previous representations.

The following comments were made to the last consultation. In the Consultation Statement, GYBC agree with the comments and state the DPD will be amended accordingly, however the change is not apparent and seems to not have been made. Other comments, however, have been dealt with and this is clear. Propose, therefore to repeat other comments.

- Rep ID CS124 – it seems that the paragraph in the previous version of the Core Strategy has been removed. The thrust of our initial comment (i.e. of protecting the setting of the Broads) is still valid.
- Section 2.1.11 does not mention the tourist economy of the Broads. This would address our previous comment (Rep ID CS105) which sought to emphasise that the environmental quality of the Broads is a positive asset for the economy.
- Rep ID CS111 does not seem to be included.
- Rep ID CS112, whilst agreed, does not seem to have been included in the vision.

	<ul style="list-style-type: none"> • 4.1.6 has not been changed (see Rep ID CS114). • CS8. Reference to seagoing leisure craft accessing the Broads is not included as suggested in Rep ID CS118 (and neither is there a reference in CS16). <p><u>Maps</u></p> <p>GYBC may wish to consider the following suggestions for improving the presentation of the maps:</p> <ul style="list-style-type: none"> • Conservation areas and agricultural land grades are both orange. Perhaps different colours could aid presentation and interpretation. • The Broads Executive Area, sea and area outside of GYBC are all grey. Again, different colours could aid presentation and interpretation. • An inset map of Great Yarmouth could be a useful addition to the suite of maps. <p><u>Sustainability Appraisal</u></p> <ul style="list-style-type: none"> • Table 3.1. The following documents are of relevance: <ul style="list-style-type: none"> ○ Broads Landscape Character Assessment. ○ Broads Biodiversity Action Plan and Framework. ○ Broads Landscape Sensitivity Study for Wind-Turbines, Photo-Voltaic and Associated Infrastructure. • Section 5.3, bullet 24. ‘Potential loss of landscape character as a result of increased greenfield development’. It is not just greenfield development that is the issue. Inappropriate brownfield development and infrastructure could potentially affect the landscape character. We would like to emphasise the issue of the impacts on landscape (and consequently tourism and biodiversity) of the landing points of undersea cables, transformer stations and underground and over ground cables on the Broads. The Broads is an area renowned for its important landscape, biodiversity as well as for tourism and navigation. Inappropriate siting of supporting infrastructure for off shore and marine industry could harm these special qualities of the Broads. • Table 9.1 Suggest all positives are green and all negatives are red as this could enable better interpretation of the table (i.e. – should be red as well as - -). • SA objective 18 is negative against CS18. It is not obvious what the policy response to this negative is to ensure it is not realised. • Table 9.2. Is there a risk to the Broads from various issues such as water extraction and landscape issues that would result from cumulative development?
ORGANISATION:	South Norfolk and Broadland District Council
DOCUMENT:	Food and Agriculture Hub Supplementary Planning Document (SPD)
LINK	http://www.south-norfolk.gov.uk/snc_collateral_includes/404error.asp?404;http://www.south-norfolk.gov.uk/foodhub.asp
RECEIVED:	11 October 2013
DUE DATE:	9 December 2013

STATUS:	Consultation on the Supplementary Planning Document (SPD)
PROPOSED LEVEL:	Endorsed by Planning Committee
NOTES:	<p>This guidance will supplement Policy 5 'The Economy' in the Joint Core Strategy for Broadland, Norwich and South Norfolk. This SPD does not create new planning policy, but it provides further interpretation and guidance on the application of the JCS policy, and so will be a material consideration in the determination of an application for planning permission.</p> <p>Normal Planning Application process will apply with relevant policies applied as appropriate (for example relating to landscape, amenity and transport).</p> <p>A summary of what the SPD says is given below:</p> <p>Location: The site should be located close to Norwich and the related areas of population, with good public transport links and access to the main road network (ie one or more of the A47, A11, A140 South, and proposed Northern Distributor Road).</p> <p>Acceptable primary uses will include:</p> <ul style="list-style-type: none"> • Storage and distribution of agricultural produce • Storage and distribution of agricultural products (i.e. have undergone processing) • Storage and distribution of agricultural equipment, machinery and supplies • Storage and distribution of livestock (e.g. livestock market) • Haulage services related to the above storage and distribution • Veterinary services <p>In addition, subject to the proportion constituting no more than approximately 10% of the area by floorspace, an element of other uses ancillary and subsidiary to the above uses will also be acceptable, including:</p> <ul style="list-style-type: none"> • Offices necessary as part of a primary use • Agritech businesses which make use of the local agriscience base • Processing of agricultural produce • Manufacture of food products • Manufacture of nonfood agricultural products (e.g. timber fencing) • Manufacture of agricultural equipment, machinery and supplies • Education / training related to agriculture and food • Display, wholesaling and retailing of agricultural and food products. <p>Initial proposals will need to present an overall master plan and will not be expected to exceed 10 hectares.</p> <p>To aid clarification, Broadland District Council was contacted.</p> <ul style="list-style-type: none"> • The idea is that it addresses the need of local growers by providing economies of scale. The aim being to make things cheaper for the farmers.

	<p>It will be aimed at local level – not a new manufacturing plant for larger, household name companies.</p> <ul style="list-style-type: none"> • With regards to scales, this is not set because the JCS policy does not mention scale so the SPD cannot. It depends on proposals. • With regards to the potential for apprenticeships: that is more operational but depending on location, the Hub could link up with colleges nearby
<p>PROPOSED RESPONSE:</p>	<p>Whilst the Broads Authority supports this idea in theory as it will support the rural economy, because the actual location is not known, and indeed the details of the design, scale and function of the Hub are not known at this stage, the Broads Authority is unable to make detailed comments. Having said that, the SPD could usefully show where such a Hub could be acceptable on a map.</p> <p>If the location is between Trowse and Great Yarmouth on the A47 or on the Northern Distributor Road (i.e. in the broad vicinity of the Broads Executive Area) we request welcome early involvement in discussions on the scheme.</p>