

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

<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.
<b>Recommendation:</b>	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

<b>ORGANISATION:</b>	Waveney District Council
<b>DOCUMENT:</b>	Pre-Submission Local Plan
<b>LINK</b>	<a href="http://consult.waveney.gov.uk/consult.ti/waveneyfinaldraftlocalplan2018/consultationHome">http://consult.waveney.gov.uk/consult.ti/waveneyfinaldraftlocalplan2018/consultationHome</a>
<b>DUE DATE:</b>	24 May. Planning Committee is after this date. WDC asked that we send in the comments within the timeframe of the consultation and state that they are then to be ratified at Planning Committee.
<b>STATUS:</b>	Publication version out for pre-submission consultation.
<b>PROPOSED LEVEL:</b>	Planning Committee endorsed.
<b>NOTES:</b>	<ul style="list-style-type: none"> <li>Waveney District Council is preparing a new Local Plan for the District (excluding the Broads Authority area). This document is the final publication draft of the new Local Plan.</li> <li>The Local Plan sets out the level of growth which needs to be planned in the Waveney area and identifies where that growth should be located and how it should be delivered. The Plan sets out the planning policies which the Council will use to determine planning applications in the Waveney area.</li> <li>The new Local Plan for Waveney will cover the period 2014-2036.</li> </ul> <div style="text-align: center;"> <p style="font-size: small;"> <span style="display: inline-block; text-align: center;">535 Homes already completed (2014-2017)</span> <span style="display: inline-block; text-align: center;">+</span> <span style="display: inline-block; text-align: center;">2,498 Homes with planning permission (not allocated in this Local Plan)</span> <span style="display: inline-block; text-align: center;">+</span> <span style="display: inline-block; text-align: center;">6,214 Homes planned for in this Local Plan</span> <span style="display: inline-block; text-align: center;">=</span> <span style="display: inline-block; text-align: center;">9,235 New homes 2014-2036</span> </p> </div> <ul style="list-style-type: none"> <li>As of April 2017, 3,033 homes have been completed or have permission and are expected to complete within the plan period. This gives a residual need of 5,190 new homes that need to be planned for in this Local Plan. Policy WLP1.1 makes clear that housing targets are minimums.</li> <li>Location of growth:</li> </ul>

	<p>© Crown copyright (and database rights) 2018 OS 100042012</p> <ul style="list-style-type: none"> <li>• Employment land development will be focused mainly in Lowestoft and Beccles and distributed approximately as follows: <ul style="list-style-type: none"> <li>○ Lowestoft Area - 60% of employment land development</li> <li>○ Beccles - 25% of employment land development</li> <li>○ Other Market Towns and Rural Areas - 15% of employment land development</li> </ul> </li> <li>• The policies map is interactive and is found here: <a href="http://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=fa885f1dc80d4bbc8ada7bcd13a43471">http://eastsuffolk.maps.arcgis.com/apps/webappviewer/index.html?id=fa885f1dc80d4bbc8ada7bcd13a43471</a></li> </ul>
<p><b>PROPOSED RESPONSE:</b></p>	<p><u>Introduction</u> The Local Plan is well presented and well written. It is set out in a logical manner. The use of interactive policies maps is welcomed. The Broads Authority does have comments on the Local Plan.</p> <p><u>Main comments</u></p> <ul style="list-style-type: none"> <li>• WLP2.1 –The Broads Authority needs to be listed as a stakeholder because part of the OB District Centre is in our area and we have resolved to have similar policies for the Centre in recognition of the fact that Local Planning Authority borders are arbitrary and also to reflect that Mutford Lock which is owned and run by the Broads Authority is the ‘back stop’ to the Lowestoft Flood Risk Management Project that is designed to benefit the area. As written it is not effective as the Broads is a cross boundary strategic priority and this particular issue relies on joint working.</li> <li>• 8.84 says ‘The Framework places strong protection on national designations such as the Area of Outstanding Natural Beauty and the Heritage Coast’. The Broads is not mentioned and considering the Broads is an asset to the area and that development outside of the Broads could impact the Broads, please add the Broads to the list. As written it is not consistent with National Policy and is not effective as the Broads is a cross boundary strategic priority.</li> <li>• WLP8.27 – the supporting text refers to landscape impact and impact on areas outside of Waveney District and mentions the Broads, yet within the policy, there is no criteria that refers to impact on protected landscapes. This needs to be rectified. Suggest a third bullet point that says ‘There are no adverse impacts on</li> </ul>

important landscapes of the Broads and AONB'. The Broads' Landscape Sensitivity Study is of relevance to this policy as it refers to sensitivity from solar farms and wind turbines not just within the Broads, but nearby. As written it is not consistent with National Policy and is not effective as the Broads is a cross boundary strategic priority.

#### Factual inaccuracies

- Page 2: 'For the Waveney area, the objectively assessed need for the Broads Authority area is 57 dwellings between ~~2012-2015~~ and 2036'.

#### Queries/comments

- WLP1.4 – wording varies from strong terms such as 'must' and 'will be expected to' to the weaker term of 'should'. Is that purposeful? Is it intended to mean that, for example, open space and schools *may be* needed? If they are definitely needed, perhaps the wording needs to be stronger like in other areas of the policy. This is of relevance to the Broads as we defer/refer to the open space requirements of our districts – so your policy on open space is also our policy. The comment applies to the use of the term 'should' throughout the document.
- WLP1.4 says 'Development will not be permitted where it would have a significant effect on the capacity of existing infrastructure, and therefore potential risks to the natural environment which cannot be mitigated'. Then goes on to specifically refer to water and waste water recycling. What other types of infrastructure does this sentence refer to?
- Page 40 – do the figures in the table include the permission at Pegasus in our area? It might be worth cross referring to that permission/allocation in the Local Plan? It is for around 76 dwellings and office space.
- Page 47, box number 21. Is it prudent to say that part of the district Centre is within the Broads and there is a related policy in the Broads Local Plan that is consistent with your approach to the area?
- 2.16 refers to 'flood evacuation plans' (and this term is used throughout the document). When producing our Flood Risk SPD, it became apparent that sometimes it is more appropriate to stay in place rather than evacuate and therefore we refer to 'flood response plans'. We note that in WLP8.24 there is reference to 'emergency flood plan'.
- Page 209 – residential annexes. We have a similar policy but have called it 'residential ancillary accommodation'. This title defines that the accommodation is ancillary to the main dwelling. We have done this as the term annexe is not defined in planning.
- WLP8.28 – 'All new residential development in the District should achieve the optional technical standard in terms of water efficiency of 110 litres/person/day unless it can be demonstrated that it is not viable or feasible to do so'. This is quite confusing. It uses the weak term 'should' and then refers to 'optional' and then there are two ways to effectively get out of the requirement. So what is the starting point? That all new residential development must be designed to 110l/h/d unless it can be demonstrated that it is not viable or feasible to do so? If so, this could be clearer. What are the feasibility issues that could come about in relation to this?
- Natural Environment section, page 255. Could include similar wording to the open

space section which says that sites within the Broads are protected in the Local Plan for the Broads.

- 8.202 does not seem to end or conclude with anything. Suggest it needs to say something like '...and these documents may be of relevance to scheme proposals near to the boundary with the Broads and developers/promotes should refer to them'. Note that something like this is stated in 8.206. Can we ask for an indication that applications which have significant potential to impact the Broads may need to be accompanied by a Landscape Visual Impact Assessment?
- 8.202 'Within the District, the area along the Waveney Valley is adjacent the Broads National Park'. This seems a little confusing and could be revised to make it clearer that part of the Broads lies within Waveney District.
- WLP8.35 – whilst the sentiment of protecting dark skies is very much welcomed, the use of the word should be weak – see previous comments on the use of this term. Is there scope to strengthen this sentence?
- 8.205 *The existing public rights of way network is fragmented in many locations and development proposals should consider how they could enhance public footways to benefit the network in the long-term.* This is more about access rather than landscape character and perhaps needs its own separate paragraph/section?
- 8.205 refers to 'strength of place' - 'sense of place' would seem to be more appropriate.
- 8.206 *'The Policy also gives specific protection from significant impacts on those landscapes which provide a setting which are outside of the designated areas the Broads and the Area of Outstanding Natural Beauty but provide a contribution to the setting of those areas'.* We support this, but it seems clunky. Is this what you are trying to say...? *The Policy also gives specific protection from significant impacts on to those landscapes areas which provide a setting to, which but are outside of, the designated areas-landscapes of the Broads and the Area of Outstanding Natural Beauty but as these areas provide a contribution to the setting of those designated areas-landscapes'.*
- 8.210 and Archaeology section – the entire Broads area is an area of exceptional waterlogged.

#### Typographical errors

- 1.14 – missing a full stop
- Section 2.3 – 'A further issue is to manage and limit ~~to~~ coalescence of the town with surrounding villages such as Blundeston, Corton, Gisleham, Hopton (in Norfolk) and Kessingland to ensure each settlement retains its individual identity'.
- Section 2.13 – 'However, it carries forward many of the proposals in order **to** ensure a planned approach to the regeneration of Central Lowestoft is achieved'.
- 8.102 – 'In coming to a view of whether a proposal would result in a concentration of non ~~a1~~ A1 or A3 uses the...'
- WLP8.22 – This does not make sense to me: 'Proposals to change the use or redevelop for a different use existing built community facilities which are not registered as an asset of community value will only be permitted if...'
- 8.156 – 'Renewable and low carbon energy developments can also have an **affect effect** on amenity of residents, visitors and workers nearby through, noise, smell, shadow flicker and glare'.
- WLP8.34 – 'The Council will work with neighbouring authorities and Natural England to develop ~~a~~ this strategy'.

<b>ORGANISATION:</b>	South Norfolk District Council
<b>DOCUMENT:</b>	Draft Open Space Supplementary Planning Document
<b>LINK</b>	<a href="https://www.south-norfolk.gov.uk/residents/have-your-say/consultations/open-space-spd-consultation">https://www.south-norfolk.gov.uk/residents/have-your-say/consultations/open-space-spd-consultation</a>
<b>DUE DATE:</b>	5 June 2018
<b>STATUS:</b>	Draft
<b>PROPOSED LEVEL:</b>	Planning Committee endorsed.
<b>NOTES:</b>	<ul style="list-style-type: none"> <li>• The SPD is intended to provide more detailed guidance to assist with the interpretation and application of South Norfolk Local Plan Policy, specifically Policy DM3.15.</li> <li>• It is of relevance to the Broads Authority as our emerging open space policy in our new Local Plan will have regard to the standards and approach taken by our districts to open space.</li> <li>• The types of open space covered in the SPD are formal play, open space, pitches and courts and informal open space.</li> <li>• It is important to note that South Norfolk will not adopt or maintain new open space going forward; this is something that Parish/Town Councils, Community Associations or Management Companies need to do.</li> </ul>
<b>PROPOSED RESPONSE:</b>	<p>Only minor comments:</p> <ul style="list-style-type: none"> <li>• Page 8, Policy Context – is it prudent to mention the Broads Authority’s emerging policy here? Note that it is mentioned in the footnote on page 7.</li> <li>• Page 14, paragraph 11 – ‘development developers’. Does not read well.</li> <li>• Page 27 – SuDS. Is it prudent to refer to the hierarchy of SuDS and the NPPG and NPPF and other guidance that exists?</li> <li>• Page 28, paragraph 1. ‘..ecology and biodiversity promote green infrastructure connectivity.’ Missing an ‘and’?</li> </ul>