

Planning Committee

18 August 2023

Agenda item number 14

Consultation responses

Report by Planning Policy Officer

Summary

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

Author: Natalie Beal

Date of report: 03 August 2023

Appendix 1 – Planning Policy consultations received

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Thorpe St Andrew Town Council

Document: [Thorpe St Andrew NDP \(southnorfolkandbroadland.gov.uk\)](https://southnorfolkandbroadland.gov.uk)

Due date: 21 August 2023

Status: Regulation 16.

Proposed level: Planning Committee endorsed.

Notes

This Neighbourhood Plan builds on the National Planning Policy Framework (NPPF) and the adopted Development Plan for Thorpe St Andrew, which includes the documents making up the Broadland District Council Local Plan and the Broads Authority Local Plan. It also anticipates the emerging Greater Norwich Local Plan (GNLP) which will replace the Adopted Joint Core Strategy. The Thorpe St Andrew NDP has been developed to ensure that future growth and development throughout the town is guided by the local community and gives an extra level of detail at the local level.

Proposed response

Summary of response

There are two objections – two policies have weaker wording than the strategic policies of the Local Plan for the Broads and the NPPF.

Objections

Objection. Policy 1 says ‘Development should minimise the disruption of habitats and seek to conserve and enhance existing environmentally important...’. The underlined wording seems quite weak and at odds with the stance in the NPPF and Strategic Policy SP6 of the Local Plan for the Broads, which are as follows:

The NPPF states at Paragraph 8c (and in other areas): ‘... to protect and enhance our natural built and historic environment’;

Policy SP6 states: ‘Biodiversity Development will protect the value and integrity of nature conservation interest and objectives of European, international, national and local nature conservation designations and should demonstrate biodiversity gains wherever possible paying attention to habitats and species including ecological networks and habitat corridors, especially linking fragmented habitats of high wildlife value’.

It is clear that the wording underlined in SP6 and the NPPF are stronger. Policy 1 therefore needs to be changed to be consistent with SP6 and the NPPF and the words such as ‘should minimise’ and ‘seek to’ which make the Neighbourhood Plan’s stance weaker than national and local plan policy, need to be removed.

Objection. Policy 8 says ‘New development proposed within the Conservation Area, or within the curtilage of a listed building, scheduled monument, or non-designated asset (full list in **Appendix C**)

should minimise the impact on these assets by...'. The underlined part is weaker in its wording than SP5 of the Local Plan for the Broads which says, amongst other things:

'The historic environment of the Broads will be protected and enhanced. Key buildings, structures and features which contribute to the Broads' character and distinctiveness will be protected from inappropriate development or change'.

This policy, as proposed, is also contrary to the NPPF which states at Paragraph 189:

'These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations'.

Policy 8 therefore needs to be changed to be consistent with SP5 and the NPPF and the words such as 'should minimise' which make the Neighbourhood Plan's stance weaker than national and local plan policy, need to be removed.

Comments

Para 1.4 – says 'the emerging local plan' – which local plan is that? We raised this before and the consultation statement said this would be clarified.

Factual. Policy 1 and map page 17. Thorpe Island (number 4) is not allocated as open space in the Local Plan for the Broads. The open space policies maps are here: [DM7 OPEN SPACES.pdf \(broads-authority.gov.uk\)](#). Thorpe Island has its own policy, yes.

Map page 17 – number 5 is a protected space in the Local Plan for the Broads by virtue of its own policy. Just checking you also want it to be a local green space as well as being protected by policy TSA1 in the Local Plan for the Broads... Local Green Space is treated like Green Belt in the NPPF, whereas TSA1 is its own policy.

Policy 2

- Policy 2 states under e) use contextually appropriate high quality materials **including** sustainable and traditional materials and f) use a range of boundary treatments **including** walling, hedging and new tree planting. Should that go further and state that the preference will be for sustainable materials / walling, hedging etc?
- Also policy 2 – there are a few typos with spaces missed (e.g. second para 'importantlandscape'; point 2 'thesettlement' etc.)

Policy 3

- 'encourages' the various policy things. This is a change in wording from the REG14 version. I raised queries at Regulation 14 stage on the use of encourage in policy 2. Queries are the same for this policy – because the policy as written only encourages, it does not require it and therefore it is not a given that these things will actually happen on a development.
- Wording on policy 3 on cycle and walking access needs to be stronger - a lot of use of "should" – this is a suburb close to an urban centre.

- Policy 3 makes no mention of ensuring adequate storage for bicycles – there should be at least as many spaces for securely storing bicycles as cars.

Policy 5 for residential moorings requiring a boat of 2 berths to have 2 cars – is this excessive?

Policy 7 – just to raise again, like I did at Regulation 14, that the three criteria are different to our policy DM44. Our original DM44 looked like Policy 7, but the Inspector said it was too permissive and told us to amend it. Just something to consider.

Appendix C : ‘Broadland District Council Offices’ are referred to. As they no longer occupy the building just refer to it as Thorpe Lodge?

Appendix C: no. 30 Pound Land instead of Pound Lane

Typographical errors

- Para 3.10 – second part of para does not really make sense... ‘The Business Park is home to a mix of business and commercial uses including some retail and prominent firms located here include Bannatynes Health Club and Spa, Startrite shoes, Yodel, Bertram Book, Premier Inn, Menzies Distribution, Royal Bank of Scotland, Costa Coffee and the Horizon Business centre’. Maybe rather than saying ‘include’, say ‘including’ or ‘such as’?
- 7.7 says ‘The policy seeks to recognising these areas’ – should it be recognise?
- Para 11.2 – typo – last few words: ‘walk to three of more key services’. Should say ‘or’.

Formatting

Para 1.2 – extra full stop

There are lots of words that need a space between them. A few examples are here, but on producing the final version, a check is required.

Para 1.1 – space needed between ‘planningpolicies’

Para 1.5 – space needed between ‘arereferred’

Para 1.8 – last bullet, space needed between ‘theriver’

Para 3.3 – space needed between ‘hasbeen’

Vision – space needed between ‘cultureand’