

**Consultation Documents and Proposed Responses**  
**Neighbouring Council Consultation: South Norfolk Council**  
**Part 1: Site Specific Allocations and Policies Document – Amendments to Preferred Options**  
**Part 2: Development Management Policies Document – Preferred Options**  
Report by Planning Policy Officer

<b>Summary:</b>	The report briefly summarises two South Norfolk planning policy documents currently the subject of consultation and proposes a response to both consultations from the Broads Authority. The closing dates for the receipt of comments is 22 May 2013
<b>Recommendation:</b>	That the Officer level proposed responses are endorsed and submitted to South Norfolk Council as the Broads Authority's formal response.

## **1 Introduction**

- 1.1 From time to time, the Broads Authority is consulted on neighbouring Council's planning policy documents. It is important that the Broads Authority takes this opportunity to assess the documents and, as appropriate, provide the relevant Council with a representation detailing the Broads Authority's views on the proposals.
- 1.2 This report is in two parts as it relates to two different planning policy documents:
  - (i) The first is the Development Management Policies Document. This document contains policies that Development Management Officers use to determine planning applications.
  - (ii) The second is the Sites Specifics Allocations and Policies Document. This document allocates sites for certain land uses and includes specific criteria that development proposals must meet.
- 1.3 Consultation ends on 22 May 2013, although South Norfolk Council has agreed to the Broads Authority submitting their comments after the 24 May Planning Committee.

## **2 Part 1: Development Management Policies Document Preferred Options**

- 2.1 The Development Management Policies will determine how South Norfolk Council carries out its development management responsibilities to promote sustainable development and how it will determine all planning applications. This document is the second stage of public consultation about the Development Management Policies. It contains 45 draft policies arranged in four themes. Each policy is supported by a reasoned justification and important background notes. There are also maps showing the extent of sites and areas designated by some of the policies. An interim Sustainability Appraisal of the impact of the draft policies is provided in a separate Document
- 2.2 The policies cover Strategic, Economic, Social and Environmental dimensions.
- 2.3 It is felt that greater prominence should be given to the Broads in this document. Adjacent authorities are required to take into account in decision making the impact on the Broads.
- 2.4 Another comment relates to consistent terminology regarding the protection of biodiversity, natural environment and landscape. In some areas phrases such as 'Serious adverse impact' are used, but in others, stronger wording such as 'should make a positive contribution' with the latter giving greater emphasis than the former.
- 2.5 Detailed comments on the document are as follows:

### **2.5.1 General Comments**

- (i) Important reference to the Broads is made on Page 26 and 128. This could have more prominence in the Reasoned Justification as well as the notes as adjacent authorities are required to take into account in decision making the impact on the Broads. The Broads have previously submitted that 'The Broads is a nationally designated area with status equivalent to a national park, the highest level of landscape protection, and a wetland of international importance. It is both partly within South Norfolk district and immediately adjacent to the Council's planning area. The importance of the Broads and the need to address this in plans for surrounding areas is highlighted in both the East of England Plan and the GNDP Joint Strategy. The Authority would like to see the Broads and its purposes given greater prominence in the final DPD, and included in criteria for development proposals in the vicinity of the Broads, with particular reference to landscape impacts, flood and water quality risks, development in the open countryside, and the interdependence of the Broads and South Norfolk planning areas in terms of community identity, facilities, and recreational and economic value.'

- (ii) The consultation documents do not make it clear that the proposed Development Management Policies will not apply to those parts of South Norfolk district within the designated Broads area.
- (iii) Renewable energy generation, especially wind power, in the South Norfolk planning area has the potential to impact upon the landscape and other important characteristics of the Broads. This should be highlighted in any policy on the matter. The Broads Landscape Character Appraisal; and the 'Broads Landscape Capacity Study for Turbine, PV Arrays and Associated Infrastructure Requirements for Renewable Energy Production' may well be of future use in assessing any such proposals having inter-visibility with the Broads area.

#### 2.5.2 **Consistent Terminology: 'Serious adverse impact', 'adverse impact', 'detrimental effect', 'unacceptable impact', 'impact on', 'should make a positive contribution', 'significant adverse'**

- (i) Throughout the document, in relation to biodiversity, natural environment and landscape, the emphasis and terminology varies. Later on in the document, from page 124 onwards, there is great emphasis on the importance of landscape and biodiversity with phrasing such as 'development should protect and enhance all natural environment assets' and 'protected from any harmful impact arising from new development'. Whereas earlier the terminology does not seem as strong with wording such as 'serious adverse impact'. It seems that the message is not clear and not consistent throughout the document which is a concern – the Broads Authority Executive area is an area of important landscape and biodiversity with equivalent status to a National Park and the text should indicate this clearly and consistently.
- (ii) The wording in DM4.13 Non-Designated Heritage Assets is very positive and strong. Perhaps such wording could be reflected in areas of the document relating to biodiversity, natural environment and landscape.

#### 2.5.3 **Policy DM 1.4 Environmental Quality and Distinctiveness**

- (i) Suggest some reference to the Broads and the local distinctiveness it offers.
- (ii) The Broads Landscape Character Appraisal and the Broads Plan (the management plan for the Broads) could usefully be highlighted.

#### 2.5.4 **Policy DM 2.3 Working from Home**

- (i) Another benefit, not listed, is the reduction in the numbers of cars on the road associated with work and reduction in carbon emissions and localised air pollution.

- (ii) Concern that unless controlled through a condition or legal agreement, the 'new building in the curtilage to allow working from home' could be subject to a change of use application. However, Policy DM 3.6 seems to some extent to allow gardens to be developed. How do the two policies relate to each other?

#### **2.5.5 Policy 2.7 Agricultural and Forestry Development**

- (i) It is not clear that this does not refer to residential. Perhaps a cross reference to Policy 2.11, which refers to rural worker residential accommodation, would be of benefit.

#### **2.5.6 Policy 4.3 Flood Risk**

- (i) Should refer to the Broads. The Broads have previously submitted that 'Flooding is a major issue for the Broads, not just in relation to risk to homes and communities, but also water quality and the environmental and wildlife value of the Broads and nearby areas. Any such policy should include off-site potential impacts including water quality and effects on flood risk up and downstream of the site as criteria, and assessment should include anticipated changes as a result of climate change. While there may well be pressure for development in areas at risk of flooding, a key task of planning is to generally resist such pressures if the development can be accommodated in areas not at risk.'

#### **2.5.7 Page 129 – Protection and enhancement of landscape character**

- (i) The Broads Landscape Character Appraisal and the Broads Plan (the management plan for the Broads) could usefully be highlighted.

#### **2.5.8 Sustainability Appraisal**

- (i) The comment above about the lack of consistent and clear terminology relating to protecting biodiversity, natural environment and landscape could have bearing on the SA assessment. Perhaps where the wording could be interpreted to afford lower protection (such as 'serious adverse effect') the SA assessment might rate that lower when compared to greater emphasis (such as 'unacceptable impact' or 'should make a positive contribution').

### **3 Part 2: Sites Specifics Allocations and Policies Document (Sites Specifics)**

- 3.1 This is a consultation on amendments to the Preferred Options version of the Sites Specifics. South Norfolk Council have taken on board relevant previous comments on the Preferred Options and improved the document. This is a specific consultation on the amendments, not the whole document. These amendments are deemed as more significant and warrant the 8 week consultation.

- 3.2 The changes cover the following places (those Parishes in the Broads Authority Executive Area are in bold): **Aldeby**, **Bramerton**, **Broome**, Colney, Costessey, Diss, **Earsham**, **Ellingham/Kirby Crane**, Framlingham Earl, **Gillingham**, Harleston, **Langley with Hardley**, Little Melton, **Loddon**, Pulham Market, Roydon, Saxlingham Nethergate, Seething, **Thurton/Ashby St Mary**, **Trowse** and Wortwell.
- 3.3 The following table addresses the amendments and includes the proposed Broads Authority response. It is also proposed to refer to a lack of delineation of the Broads Executive Area on the Ellingham and Loddon maps.
- 3.4 The proposed response would include the text in the last column of the following table. Please note that whilst the proposed comments relate to Parishes which are in the Broads, some of the comments refer to the out-of-Broads hinterland as this still functions as the village and will have an effect on the Broads.

#### **4 Links of Relevance:**

- 4.1 The Sites Specifics Consultation is here: <http://www.south-norfolk.gov.uk/planning/4620.asp>
- 4.2 The Development Management Consultation is here: <http://www.south-norfolk.gov.uk/planning/5165.asp>

#### **5 Financial Implications**

- 5.1 No direct financial implication. Officer time in responding to further consultations and subsequent planning applications of relevance.

#### **6 Conclusion**



- 6.1 Regarding the Development Management Policies Document, the main area of concern is reference to the Broads as well as strength of wording when referring to biodiversity, landscape and natural environment.
- 6.2 Regarding the Sites Specifics Document, the main area of concern is the development of a County Wildlife Site, although Norfolk Wildlife Trust cannot prove a negative impact of the scheme. In general, notwithstanding this issue, the proposed amendments seem acceptable from the Broads Authority's point of view.

Background papers: None

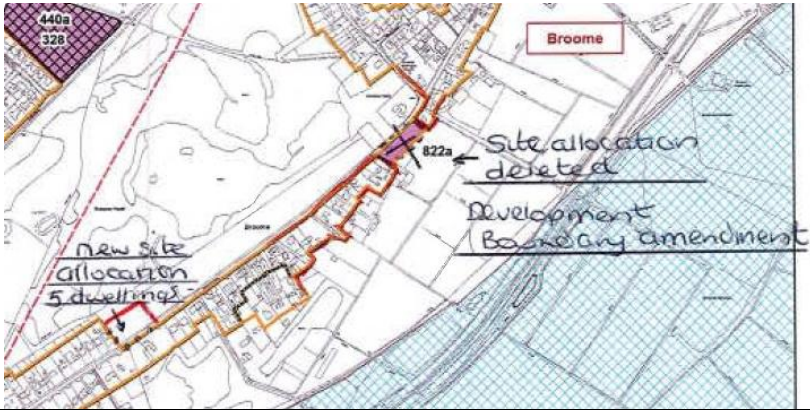
Author: Natalie Beal  
Date of report: 8 May 2013

Appendices: APPENDIX 1 – Location Plans


## APPENDIX 1

Location	Amendment to Preferred Options	Snippet from Map	Proposed Broads Authority Response
Bramerton	Initial proposal was an allocation for residential on Surlingham Lane to the north of Bramerton. Site deleted due to highway concerns.		Supported as original proposal seemed fairly isolated.
Trowse	Initial proposals allocated 250 dwellings. Issues regarding school places has led to removal.		Supported - Settlement Boundary reverts to existing

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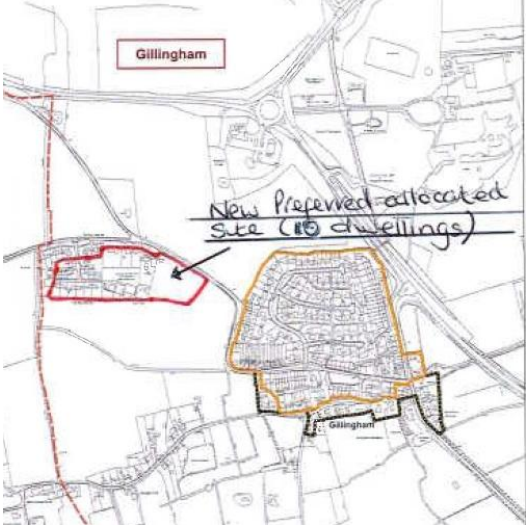

Broome and Ditchingham	A site for residential in between two segments of settlement boundary is deleted. Landowner withdrew site.		Supported - Settlement Boundary reverts to existing
Broome Heath	A new site for 5 dwellings is allocated. It should be noted that the area of the proposal seems to be part of a County Wildlife Site. No NWT objection as no evidence on how 5 dwellings would affect Heath.		The site is designated as a County Wildlife Sites and Local Nature Reserve. The development should be compensated by a Section 106 agreement, with habitat compensation payments going to Norfolk Wildlife Trust. Semi-natural habitat including the mature trees (particularly those to the East of the proposed site) should be retained on site, and therefore access should be carefully considered.

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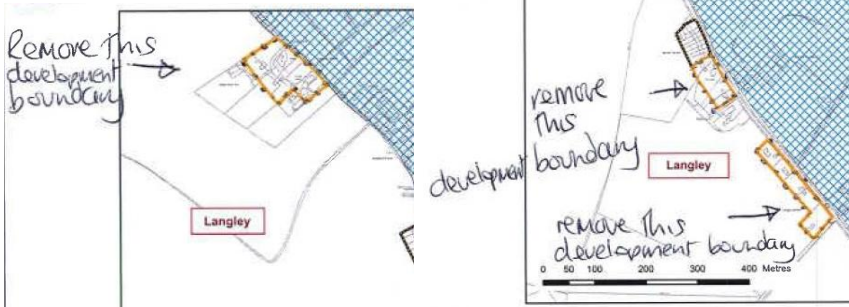
<p>Kirby Crane/Ellingham</p>	<p>The land allocations for residential have been removed and the Settlement Boundary is returned to as it is now. Significant highways objection.</p>		<p>Supported - Settlement Boundary reverts to existing</p>
<p>Ashby St Mary/Thurton</p>	<p>Residential site allocation deleted. No confirmation of viability received from landowner.</p>		<p>Supported - Settlement Boundary reverts to existing</p>

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Gillingham	A new allocation for 10 dwellings away from Gillingham Settlement Boundary. Note that the proposal is outside of the Broads Authority. Originally not considered due to flood risk, but landowner demonstrated 10 dwellings can be acceptably developed.	 <p>The map shows the Gillingham settlement boundary in orange. A new proposed allocation site for 10 dwellings is highlighted in red, located to the west of the main settlement area. Handwritten text on the map reads 'New Proposed allocated Site (10 dwellings)' with an arrow pointing to the red-outlined area. A label 'Gillingham' is present in a red box at the top of the map.</p>	Initial concern is lack of access to services, but near to a Primary School and a footway exists to Gillingham. As such, does not feel that isolated – 0.2 miles from edge of main area of Gillingham. No comment.
Earsham and Loddon	Schools moved into the Settlement Boundary.	 <p>Two maps are shown side-by-side. The left map shows a development boundary amendment for Earsham, with a red-outlined area labeled 'Development Boundary Amendment' and a purple-shaded area labeled '064'. The right map shows a development boundary amendment for Loddon, with a red-outlined area labeled 'Development Boundary Amendment' and a purple-shaded area labeled '530'. A label 'Loddon' is present in a red box at the bottom of the right map.</p>	Initial query why schools now inside Settlement Boundary. Initially concerned regarding plans for the schools once inside Settlement Boundary (from a service provision point of view). Request of NCC – if want to add mobiles, will have to go to Committee. No comment.

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Aldeby	Removing Towbar site. Prior to Preferred Options, did not have a Settlement Boundary.		No comment.
Langley	South Norfolk was to propose Settlement Boundary, but not allocation of development. Now not going to have a boundary (does not have a proposals/policies map currently). Removed due to proximity to Broads and flooding risk.		Supported – reverting to existing i.e with no Settlement Boundary.

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