

Consultation Documents Update and Proposed Responses
Report by Planning Policy Officer

<p>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.</p> <p>Recommendation: That the report be noted and the nature of proposed response be endorsed.</p>
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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:	Greater Norwich
DOCUMENT:	Greater Norwich Local Plan
LINK	http://www.gnlp.org.uk/have-your-say/
DUE DATE:	15 March
STATUS:	Growth Options and sites – effectively an ‘Issues and Options’.
PROPOSED LEVEL:	Planning Committee endorsed
NOTES:	<p>Details of consultation from Greater Norwich Development Partnership (GNDP):</p> <p>We are seeking your views on a Growth Options document, which sets out:</p> <ul style="list-style-type: none"> • the broad housing numbers required to 2036; • six main distribution options; and • a significant number of questions on various policy areas such as air quality, landscape and affordable housing <p>It is very important to note that this is an early consultation stage – no final decisions have been made on any policy choice.</p> <p>The Site Proposals document is also published for consultation. It lists sites submitted to us for consideration for various uses through the plan, along with a settlement summary for those parishes where sites have been submitted. Again, no final decisions have been made on any site, and you can view the Site Proposals document and interactive maps online via www.gnlp.org.uk, making your comments at the same time. You can comment on whichever sites interest you. The Housing and Economic Land Availability Assessment (HELAA) in the evidence base has more detail on the sites submitted for potential inclusion in the GNLP. Other evidence studies, along with the Interim Sustainability Appraisal are also available online for comment.</p>
PROPOSED RESPONSE:	<p>The Growth Options document is well presented and easy to navigate. The Site Maps also are easy to navigate and the mapping system is easy to use.</p> <p><u>Comments on Growth Options document</u></p> <ul style="list-style-type: none"> • More housing could lead to more pressure on Whitlingham Country Park. The Broads Authority has sought to address this in policy PUBNOR1. That may be of relevance to your Local Plan: ‘A proportionate developer contribution will be required to address any increased demand on services and facilities in Whitlingham Country Park arising from the creation of this link’. • Throughout – the NSF is now the Norfolk Strategic Planning Framework (NSPF) • 1.24 – confused by the use of the word ‘expected’. • Maps showing the Norwich urban area, policy area, suburbs, fringe, core area • 4.19 – lots of figures in there and not clear what the message is. Could this be displayed in a table or bullet points? • 4.24 – question 43 relates to houseboats. Think the reference is wrong here. • 4.18 to 4.25 – recommend a paragraph about the OAN for the Broads is included here – that our OAN is part of the overall OAN for the three districts. • 4.59 – last sentence does not make sense.

	<ul style="list-style-type: none"> • Defining the City Centre area options – there seems to be no mention of empty units and their role in meeting future need. • Question 20 – there are potential links to the Broads here. Perhaps reference to the River Wensum Strategy. The River Wensum Strategy is a Norwich City Council led partnership which includes the Broads Authority, Norfolk County Council, the Environment Agency and the Wensum River Parkway Partnership. The “vision” of the strategy is to enhance the River Wensum and to promote its importance to the continuing growth and vitality of Norwich. The proposed projects within the strategy will stretch from Hellesdon Mill through to Whitlingham Country Park and aim to enhance the river Wensum and the surrounding areas for both users and residents. • 4.114 and 4.155 – does the option for travelling between the villages have influence on the suitability of this approach? Are footways provided between the settlements for example, or is there a bus that runs through the settlements? • Figure 5, page 55, rows numbered 4, 5, 6, third column for each. No mention of ‘local environmental and infrastructure constraints’ like in the other rows. Why is this? One would expect this to be an important consideration for all tiers of the hierarchy. • Figure 6, tier 4 Village Groups – would you allocate the groups: Village A provides a school, village B a shop and C a GP (for example) and these together form a village group...? • 6.72 – perhaps worth noting that whatever you do regarding affordable housing is of relevance to the Broads as our policy will be to defer or have regard to your policy. • Option AH7 – edge of settlements can bring urban area closer to the Broads. This will need to be an important consideration in any policy – dark skies and landscape impacts. • 6.91 housing mix. It is noted that the construction of extensions to smaller properties (ie ‘improve, not move’) results in a reduction of the stock of smaller properties and impacts on availability for smaller dwelling and, indirectly, on affordability. • Page 89 – title should include Gypsies and Travellers and Travelling Showpeople. • Page 92 – houseboats. For your information, the Broads Authority uses the term ‘residential moorings’ as it is mooring space that is provided rather than the boat itself. Please refer to the criteria based policy on residential moorings as that may be of assistance. It might be useful to have a consistent policy as if residential moorings were to come forward in the City for example, it would be a joint application to the Broads Authority and the City Council as we are the LPA for the water and the land respectively. Of course it depends on how much detail your strategic policy will go into, so this might be more for City’s Development Management document as and when it is produced. • 6.119 – could the use of the term ‘dwellings’ here cause confusion? Would ‘caravans’ be better? • Page 96, climate change. The Broads Authority has introduced a checklist that you may wish to look at to help you address adapting to climate change. • Page 98 air quality. This focusses on preventing the air quality getting worse through targeting emissions. Is there anything else that can be done, such as more street tree planting? • Page 108, landscape. The Broads Authority has looked into the settlement fringe issue. Please see our policy and work completed with GYBC and WDC. • 6.179 – wind turbines also need local support.
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- Option EN1 – you may wish to look at the Broads policy that covers the same topic.
- Option W1 – the Broads Authority has a policy that requires 110l/h/d
- Communities section page 116. There is an absence of reference to health needs, education needs, other community facilities or anything that relates to deprivation and cohesion.
- 6.218 – query ‘The Broads Authority has its own local plan and is the planning authority for most planning applications within its area’. Why most? Do you mean except minerals and waste? Please can you clarify?
- 6.221 – perhaps reference the special qualities that are set out in the Broads Local Plan.
- Question 63: Support and happy to help inform or shape the policy.
- Appendix 1: Growth Options – the Broads Authority is content to focus on specific sites, where they are and what they are for, rather than commenting on the strategy.
- The Historic Environment seems to be covered by the “environment objective” This is a broad objective even in a strategic document of this nature. Generally the richness of the area’s historic environment including Archaeology and geodiversity is not clearly identified either as an observation or of more concern brought out in a specific strategic policy. The Culture section mentions the built environment but then the objective seems to be lost in the policy wording. The Historic environment is an incredibly important, fragile and finite resource much valued by people. It cannot be replaced, it can be augmented. The strategic objectives need to acknowledge and reflect this more positively. The term Historic Environment should be specifically used along with a definition of what this includes.
- Secondly in terms of the Broads, the term environment can be confusing in terms of the natural and built environment ; clarity is required between the two which are equally important in the Broads area – this should be clarified. Specific reference should be made to the areas potential for special archaeological interest identified by Historic England.

Comments on the Sites

With regards to the River Yare (Site N E21), reiterate that any development adjacent the river would need to consider the development of a bridge to allow pedestrian and cycling access to Whitlingham and the National Park from the centre of Norwich.

- Wroxham

Aware Wroxham can only grow in one direction due to the river and the Broads. Aware that the Town Centre, secondary school and train station are over the river. Aware of the traffic pressure on the bridge and in Hoveton Town Centre already and in the summer season from tourists. How has or will planning the future development sites for Wroxham be coordinated with Hoveton? As the settlements join up and use each other’s facilities, have NNDC been involved in looking at which sites in Hoveton are available and then joined up thinking to see where allocations for this plan period are best for the two settlements taken as a whole (aware they are two different settlements)? What about joint transport research for Hoveton and Wroxham as a whole to reflect proposals and constraints? It is also worth noting that the bridge is a Schedule Ancient Monument.

GNL0041 – Wroxham Football Club, 20 dwellings.

Where would the current football club go? This might also visually impact on the Broads landscape and the existing Wroxham Conservation Area - early discussion about this would be welcomed. This site is also within the Wroxham Conservation

	<p>Area.</p> <ul style="list-style-type: none"> • Salhouse GNLP0157 – Tourism Use This appears to be partly in the Broads area. Would welcome early discussions on this. Likely to be too late to allocate anything in the Broads Local Plan. Other than Tourism Use, no other details provided. What is this for? This is also partly within the Salhouse Conservation Area. • Acle GNLP1049 - residential development This is right up to the border with the Broads. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Dark skies. Could have significant visual impact. <p>GNLP0007 – 12 dwellings This is near the border with the Broads. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Dark skies.</p> <p>Early discussions welcomed also on GNLP 0384.</p> <ul style="list-style-type: none"> • Postwick GNLP0370 – 75 and 115 dwellings and primary school This is right up to the border with the Broads. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Dark skies. Could have significant visual impact. Could have significant visual impact. • Whittingham area GNLP0360 – Deal Ground site - Residential led mixed use redevelopment to include employment, retail community uses, potential primary education provision and local greenspace and biodiversity areas. This is right up to the border with the Broads and of a large scale. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Redevelopment of site could give rise to new opportunities for pedestrian/cycleway bridge over River Yare. The creation of this new connected access to Whittingham and the Broads National Park from the centre of Norwich would highlight the River Wensum Strategy aspirations along with those of the Broads Local Access Forum. Could have significant visual impact. • Norwich GNLP1011 – protect as sports centre in community use. Support GNLP0409 - Deallocation of Policy CC17b and the area of CC17a. Please can you expand on what this means please? Why is this being de-allocated? GNLP0068 - Residential-led mixed use development for an undetermined number of dwellings (Despite its small size the site could support a high density development and is thus considered suitable for the land availability assessment.) This is right up to the border with the Broads and of a large scale. Would welcome early discussions on this. Would be extending the built up area in a way that could
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affect the Broads.

There may be access issues if development was agreed at this location. The River Wensum Strategy has identified this site as a potential continuation "link" of the Riverside Walk and any development here would need to consider this in their proposals. Could have significant visual impact. Issues around continued canalisation of the river.

GNLP0401 - Residential-led mixed use development for approx. 400 dwellings with retail and/or other appropriate city centre uses at ground floor level.

This is right up to the border with the Broads and of a large scale. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads.

Redevelopment of site could give rise to new opportunities for access to River Wensum for small craft and canoes along with pedestrian access to the waterside. Could have significant visual impact. Issues around continued canalisation of the river.

- Surlingham

GNLP0374 - Residential development

This is near the Broads border. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Dark skies. Potential for visual impact on the Broads landscape

- Rockland St Mary

GNLP0531 – 200 dwellings

This is right up to the border with the Broads and of a large scale. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Potential for significant visual impact on the Broads landscape.

- Cantley

GNLP0281 - Demolition of existing dwellings and residential redevelopment for approx. 20 homes with new entry road from Peregrine close

This is right up to the border with the Broads and of a large scale. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Potential amenity issues associated with Cantley Sugar Beet Factory (business already in existence). Potential for high visual impact over open marsh landscape.

- Haddiscoe

GNLP0455 - Employment, storage and distribution uses.

This is near our border. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Dark skies. Potential for visual impact on the Broads landscape. Also GNLP 0414 More limited potential for visual impact but early discussions on this would also be welcomed.

- Gillingham

GNLP0274 - Residential development of an unspecified number.

This is near the Broads border. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Dark skies. Potential for visual impact on the Broads land scape.

- Geldeston

GNLP1004 – resi 4-5 dwellings

	<p>This is near the Broads border. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Dark skies. Darkest area of the Broads. More limited potential for visual impact. Located within the Geldeston Conservation area.</p> <ul style="list-style-type: none">• Kirby Cane GNLP0303 – 11 dwellings GNLP0304 – 15 dwellings GNLP0305 – 32 dwellings This is near the Broads border. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Dark skies.• Chedgrave GNLP0541 – 5-8 dwellings This is right up to the border with the Broads and of a large scale. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. Potential for visual impact on the Broads landscape.• Loddon GNLP0313 – 68 dwellings This is near the Broads border. Would welcome early discussions on this. Would be extending the built up area in a way that could affect the Broads. More limited potential for visual impact.
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