

**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

## APPENDIX 1

### Planning Policy Consultations Received

<b>ORGANISATION:</b>	Norwich City, Broadland District, South Norfolk Councils
<b>DOCUMENT:</b>	Greater Norwich Local Plan Sustainability Appraisal Scoping Report Consultation
<b>LINK</b>	<a href="http://www.greaternorwichlocalplan.org.uk/">http://www.greaternorwichlocalplan.org.uk/</a>
<b>RECEIVED:</b>	20 June 2016
<b>DUE DATE:</b>	5pm on Monday 15th August 2016
<b>STATUS:</b>	Consultation
<b>PROPOSED LEVEL:</b>	Planning Committee endorsed
<b>NOTES:</b>	This is one of the first stages in the production of the Local Plan as the Sustainability Appraisal needs to inform the policy approach. Generally, this stage is not a wide ranging consultation, but limited to environmental bodies as required in regulations and other organisations that may have comments to help inform and improve the document.
<b>PROPOSED RESPONSE:</b>	<p>A very thorough Sustainability Appraisal Scoping Report with good reference to the Broads Authority.</p> <p>There are some comments however:</p> <p><u>Air quality and noise</u>          Perhaps the title needs amending as light pollution is referred to as well.          On the issues of light pollution, the Authority has assessed the dark skies of the Broads. The report and maps can be found here. As it can be seen, on areas near to the edge of the Broads and the Greater Norwich area have good or very good quality dark skies. The authority requests that light pollution is a key consideration as the new Local Plan is produced. <a href="http://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/757402/Broads-Authority-Dark-Skies-Study-March-20161.pdf">http://www.broads-authority.gov.uk/_data/assets/pdf_file/0007/757402/Broads-Authority-Dark-Skies-Study-March-20161.pdf</a> There are also CPRE maps which effectively assess dark skies when looking down and give further evidence relating to areas of dark skies. <a href="http://www.cpre.org.uk/resources/countryside/dark-skies/item/4311-night-blight-2016-mapping-england-s-light-pollution-and-dark-skies">http://www.cpre.org.uk/resources/countryside/dark-skies/item/4311-night-blight-2016-mapping-england-s-light-pollution-and-dark-skies</a> and here are interactive maps: <a href="http://nightblight.cpre.org.uk/">http://nightblight.cpre.org.uk/</a></p> <p>Furthermore there is one mention of tranquillity throughout the document which is quoting the NPPF. The Broads and other rural areas offer tranquillity. There are CPRE tranquillity maps which might be of interest: <a href="http://www.cpre.org.uk/resources/countryside/tranquil-places/item/1839-">http://www.cpre.org.uk/resources/countryside/tranquil-places/item/1839-</a></p> <p><u>Climate change.</u>          There does not seem to be a mention of the Broads in this section. The easterly, low-lying and coastal nature of the Broads makes it vulnerable to the impacts of climate</p>

change and sea level rise. There is more information at the webpage:  
<http://www.broads-authority.gov.uk/looking-after/climate-change>

With regards to flood risk, the Broadland Flood Alleviation Project may be of relevance:  
<http://www.bfap.org/>

#### 2.3.11

Wind turbines outside of the Broads can have impacts on the landscape setting of the Broads. The Landscape Sensitivity Study for the Broads assesses the sensitivity to large structures, namely turbines but also solar. <http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-sensitivity-studies>

#### 2.4

You may wish to check this webpage for the climate change allowances that the Government have recently set. <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances>

#### Biodiversity

There is the Broads Biodiversity Action Plan: <http://www.broads-authority.gov.uk/looking-after/managing-land-and-water/biodiversity>

There is the Broads integrated access strategy: <http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/conservation-publications-and-reports/water-conservation-reports/49.-Integrated-Access-Strategy.pdf>

#### 4.3.4

Generally well written although the setting of the Broads is important as well and that is where the districts have the greatest influence.

Here is the Landscape Character Assessment for the Broads: <http://www.broads-authority.gov.uk/news-and-publications/publications-and-reports/planning-publications-and-reports/landscape-character-assessments> this is being reviewed.

#### Water

More information relating to the Broads can be found here: <http://www.broads-authority.gov.uk/looking-after/managing-land-and-water/water-quality>

#### Heritage

The NPPF included landscape in its definition of heritage asset. The Broads is a protected landscape and should be considered at this section.

Should non designated heritage assets be mentioned here? The Local Lists? The Broads Local List is here: <http://www.broads-authority.gov.uk/planning/Other-planning-issues/protected-buildings/broads-local-list-of-heritage-assets>

Historic England class the Broads as an area of exceptional waterlogged heritage potential. That is not just the Broads Authority Executive Area.

Figure 80 – housing need

Should the need of the Broads be summarised somewhere in related documents?

Page 132

Regarding the top row of the table, I would suggest improved wording. It is about protecting the Broads and its setting.

Figure 84

SA1 row – there could be reference to tranquillity here. Why do the three decision making criteria have different wording regarding impact? It seems that saying ‘will it minimise...’ is effectively saying that some impact is ok?

SA2 row – query the use of the word ‘continue’. It is not clear how an allocation can ‘continue’ to reduce carbon emissions etc.

SA4 row – it seems the landscape element of this is an afterthought. With the Broads being part of the three districts, we would like to see an objective that raises the importance of impact on landscape and setting. A decision making criteria which mentions the Broads is also requested.

SA10 row – there is not an education objective but there are decision making questions.

SA13 – heritage assets relate to landscape so there could be scope to mention the Broads in relation to this objective as well

Appendix 1

We request that the documents referred to in this representation are reviewed (if not done so already).